Massachusetts Point Project

Final EIR

Prepared For
City of Riverside

November 2025

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1. Introduction

This Final Environmental Impact Report (Final EIR) has been prepared in conformance with the environmental policy guidelines for the implementation of the California Environmental Quality Act (CEQA) to evaluate the environmental effects that may result from construction and operation of the proposed Massachusetts Point Project (proposed Project).

According to CEQA Guidelines Section 15132, the Final EIR shall consist of:

(a) The Draft Environmental Impact Report (Draft EIR) or a revision of the Draft EIR;

(b) Comments and recommendations received on the Draft EIR, either verbatim or in summary;

(c) A list of persons, organizations, and public agencies commenting on the Draft EIR;

(d) The responses of the lead agency to significant environmental points raised in the review and consultation process;

(e) Any other information added by the lead agency.

This document contains responses to comments received on the Draft EIR during the public review period, which began June 26, 2025, and ended on August 11, 2025. A Notice of Availability of the Draft EIR was published concurrently with distribution of the Draft EIR. This document has been prepared in accordance with CEQA, the State CEQA Guidelines, and represents the independent judgment of the lead agency, which is the City of Riverside. This document and the circulated Draft EIR comprise the Final EIR in accordance with CEQA Guidelines, Section 15132.

1.1 FORMAT OF THE FINAL EIR

The following chapters are contained within this document:

Section 1.0, Introduction. This section describes CEQA requirements and the content of the Final EIR.

Section 2.0, Revisions to the Draft EIR. This section contains revisions made to the Draft EIR as a result of the comments received by agencies and organizations as described in Section 2.0, and/or errors and omissions discovered since release of the Draft EIR for public review.

The City of Riverside has determined that none of this material constitutes significant new information that requires recirculation of the Draft EIR for further public comment under CEQA Guidelines Section 15088.5. The additional material clarifies existing information prepared in the Draft EIR and does not present any new substantive information. None of this new material indicates that the Project would result in a significant new environmental impact not previously disclosed in the Draft EIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that would not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

Section 3.0, Response to Comments. This section provides a list of agencies and organizations who commented on the Draft EIR, as well as copies of their comment letters received during and following the public review period, and individual responses to their comments.

Section 4.0, Mitigation, Monitoring, and Reporting Program. This chapter includes the Mitigation Monitoring and Reporting Program (MMRP). CEQA requires lead agencies to "adopt a reporting and mitigation monitoring program for the changes to the project which it has adopted or made a condition of

project approval in order to mitigate or avoid significant effects on the environment" (CEQA Section 21081.6, CEQA Guidelines Section 15097). The MMRP was prepared based on the mitigation measures included in the Draft EIR and finalized in this Final EIR.

1.2 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review and comment of Draft EIRs should be "*on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible … CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.*"

CEQA Guidelines Section 15204(c) further advises, "*Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.*" Section 15204(d) also states, "*Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility.*" Section 15204(e) states, "*This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.*"

In accordance with Public Resources Code (PRC) Section 21092.5, copies of the written responses to public agencies are being forwarded to those agencies at least 10 days prior to certification of the Final EIR, with copies of this Final EIR document, which conforms to the legal standards established for response to comments on the Draft EIR pursuant to CEQA.

2. Errata

2.1 INTRODUCTION

As provided in Section 15088(c) of the CEQA Guidelines, responses to comments may take the form of a revision to a Draft EIR or may be a separate section in the Final EIR. This section complies with the latter option and provides changes to the Draft EIR shown as strikethrough text (i.e., ~~strikethrough~~) signifying deletions and red bold text (i.e., **bold**) signifying additions. These changes are meant to provide clarification, corrections, or minor revisions made to the Draft EIR initiated by the Lead Agency, City of Riverside, reviewing agencies, the public, and/or consultants based on their review. Text changes are presented in the section and page order in which they appear in the Draft EIR. None of the corrections or additions constitute significant new information or substantial project changes that, in accordance with CEQA Guidelines Section 15088.5, would trigger the need to recirculate portions of or all of the Draft EIR.

2.2 CHANGES TO THE DRAFT ENVIRONMENTAL IMPACT REPORT

2.2.1 Section 1.0 Executive Summary

Location: Page 1-22, Section 1.5, *Summary of Impacts*, is revised as follows:

Explanation for Change and Discussion: Revised table for consistency with threshold analysis.

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.3 Air Quality				
Threshold B: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard?	**PPP AQ-1: Rule 403.** The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403, which includes the following: • All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions. • The contractor shall ensure that all disturbed unpaved roads	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	and disturbed areas within the project are watered, with complete coverage of disturbed areas, at least 3 times daily during dry weather; preferably in the mid-morning, afternoon, and after work is done for the day. • The contractor shall ensure that traffic speeds on unpaved roads and project site areas are reduced to 15 miles per hour or less. PPP AQ-2: Rule 1113. The Project is required to comply with the provisions of SCAQMD Rule 1113. Only "Low-Volatile Organic Compounds" paints (no more than 50 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications shall be used.			
Threshold C: Would the Project expose sensitive receptors to substantial pollutant concentrations?	**PPP AQ-3: Rule 1470.** The Project is required to obtain permits from SCAQMD for the proposed diesel fire pumps and emergency generators and would be required to comply with Rule 1470, regulating the use of diesel-fueled internal combustion engines. **PDF AQ-3: The Project would be designed to include the installation of signs at**	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	every truck exit providing directional information to the trucks' routes. This design feature would prevent nearby sensitive receptors from further exposure to criteria pollutants during the operation of the Project. No quantitative credit was taken in the air quality analysis for this design feature. **PDF AQ-4: The Project would have a truck check-in point inside of the Project site, consistent with best practices for siting and designing warehouse facilities. This design feature would help manage truck circulation on-site and reduce idling on surrounding roadways, thereby minimizing operational exposure of nearby sensitive receptors to criteria pollutants. No quantitative credit was taken in the air quality analysis for this design feature.** **PDF AQ-5: The Project would be designed to provide overnight truck parking inside of the Project site. This design feature would encourage trucks to not park overnight near sensitive receptors and prevent further exposure to criteria pollutants during the operation of the Project. No quantitative credit**			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	was taken in the air quality analysis for this design feature.			
Threshold D: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	**PPP AQ-4: Rule 402.** The Project is required to comply with the provisions of SCAQMD Rule 402. The Project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. **PDF AQ-1: The Project would use light-colored paving and roofing materials. This design feature would reduce heat absorption, thereby lowering cooling demands and associated energy use, which in turn would reduce operational air quality impacts. No quantitative credit was taken in the air quality analysis for this design feature.** **PDF AQ-2: The Project would use Energy Star heating, cooling, and lighting devices and appliances. This design feature would increase energy**	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	efficiency and reduce electricity demand, which in turn would reduce operational air quality impacts. No quantitative credit was taken in the air quality analysis for this design feature.			
Cumulative	**PPP AQ-1:** As listed previously **PPP AQ-2:** As listed previously **PPP AQ-3:** As listed previously **PPP AQ-4:** As listed previously **PDF AQ-1: As listed previously** **PDF AQ-2: As listed previously** **PDF AQ-3: As listed previously** **PDF AQ-4: As listed previously** **PDF AQ-5: As listed previously**	Less than significant	None required	Less than significant
5.5 Cultural Resources				
Threshold C: Would the Project disturb any human remains, including those interred outside of formal cemeteries?	**PPP CUL-1:** ~~**Human Remains.** If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5. Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the San Bernardino County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code~~	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	~~Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. If the San Bernardino County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted by the Coroner within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant." The Most Likely Descendant shall then make recommendations and engage in consultation with the property owner concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.~~ **Discovery of Human Remains: In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then**			

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	inform the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts. **The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The County Coroner will notify the Native American Heritage Commission in accordance with California Public Resources Code 5097.98.** **According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052) determined in consultation between the Project proponent and the MLD. In the event that the Project proponent and the MLD are in disagreement regarding the disposition of the remains, State law will apply and the median and decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)).**			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.9 Hazards and Hazardous Materials				
Threshold A: Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	**PPP HYD-1: NPDES/SWPPP.** Prior to issuance of any grading permits, the applicant shall provide the City Public Works Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site. **PPP HAZ-1: SCAQMD Rule 1166.** Prior to issuance of grading or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that it has applied for and obtained a SCAQMD Rule 1166 Contaminated Soil Mitigation Plan that includes but is not limited to the following, as required by SCAQMD: Monitor for VOC contamination at least once every 15 minutes commencing at the beginning of	Potentially significant.	~~**Mitigation Measure HAZ-1: SARWQCB Concurrence.** Prior to the issuance of a grading permit or the commencement of any ground-disturbing activities, the City of Riverside shall obtain SARWQCB concurrence with proposed mitigation measures and project design features directly related to environmental conditions regulated by this agency to ensure compliance with applicable regulatory requirements. No grading or construction activities shall begin until written confirmation of regulatory concurrence has been received and verified by the City.~~ ~~**Mitigation Measure HAZ-2:** Prior to issuance of a grading or excavation permit a SMP shall be approved by the Santa Ana Regional Water Quality Control Board. The SMP will describe general methods for the identification and management of soils potentially impacted by VOCs Site-wide. In areas where VOCs are suspected to potentially be present in soil (i.e., in the vicinity of areas previously identified on the North Parcel and any other areas in which potential VOC impacted soils are otherwise identified), earth working activities will be conducted by a contractor with a current SCAQMD Rule 1166 Various Locations~~	Less than significant.

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	excavation or grading and record all VOC concentration readings. Handling VOC-contaminated soil at or from an excavation or grading site shall segregate VOC-contaminated stockpiles from non-VOC contaminated stockpiles such that mixing of the stockpiles does not take place. VOC-contaminated soil stockpiles shall be sprayed with water and/or approved vapor suppressant and covered with plastic sheeting for all periods of inactivity lasting more than one hour. A daily visual inspection shall be conducted of all covered VOC contaminated soil stockpiles to ensure the integrity of the plastic covered surfaces. Contaminated soil shall be treated or removed from an excavation or grading site within 30 days from the time of excavation.		~~Plan, and the SMP will describe the methods to identify, manage, and dispose of "VOC Contaminated Soil" as defined in Rule 1166 (i.e., soils emitting VOCs at concentrations greater than 50 parts per million [ppm] as hexane). The SMP will also describe more conservative monitoring criteria and thresholds for targeted excavation of soils in suspected historical VOC release areas on the North Parcel (and potentially other locations in the event that a previously unidentified VOC or petroleum hydrocarbon release area is discovered during earth working activities).~~ ~~Per SCAQMD Rule 1166, the SMP shall include protocols for minimizing VOC emissions into the atmosphere during construction, including excavation, grading, handling, and treatment of VOC-impacted soils, and shall describe associated notification requirements, monitoring requirements, soil handling protocols, and recordkeeping requirements. In the event that "VOC-contaminated soil" is identified as defined within Rule 1166, the soil shall be handled in accordance with the Rule and the associated Various Locations Plan. A project-specific Health and Safety Plan (HASP) shall also be prepared in accordance with California Occupational Safety and Health Administration (OSHA) standards and~~	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			~~other applicable rules and regulations, which will incorporate appropriate health and safety precautions to be implemented to protect workers and the public from exposure to potentially hazardous substances that may be encountered during these earth-working activities.~~ ~~**Mitigation Measure HAZ-3: Health and Safety Plan (HSP).** Prior to ground-disturbing activities, including grading, trenching, excavation, or structure demolition, a HSP shall be approved by the City of Riverside Fire Department as the Certified Unified Program Agency (CUPA), with responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management. The Project Applicant and/or the construction contractor(s) shall retain a qualified professional to prepare a site-specific HSP in accordance with federal Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1910.120) and California OSHA regulations (8 CCR Section 5192). HSPs shall be a condition of the well abandonment, grading, construction, and/or demolition permit(s). The HSP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-~~	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			~~disturbing activities from exposure to hazardous materials, including vapor and soil contamination.~~ **Mitigation Measure HAZ-1: Soil Management Plan (SMP) and Health and Safety Plan (HSP). Prior to issuance of a grading or excavation permit a SMP shall be approved by the Santa Ana Regional Water Quality Control Board.** **The SMP will describe general methods for the identification and management of soils potentially impacted by VOCs Site-wide. In areas where VOCs are suspected to potentially be present in soil (i.e., in the vicinity of areas previously identified on the North Parcel and any other areas in which potential VOC impacted soils are otherwise identified), earth working activities will be conducted by a contractor with a current SCAQMD Rule 1166 Various Locations Plan, and the SMP will describe the methods to identify, manage, and dispose of "VOC Contaminated Soil" as defined in Rule 1166 (i.e., soils emitting VOCs at concentrations greater than 50 parts per million [ppm] as hexane). The SMP will also describe more conservative monitoring criteria and thresholds for targeted excavation of soils in suspected historical VOC release areas on the North Parcel (and potentially other locations in the event that a**	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			previously unidentified VOC or petroleum hydrocarbon release area is discovered during earth working activities). **Per SCAQMD Rule 1166, the SMP shall include protocols for minimizing VOC emissions into the atmosphere during construction, including excavation, grading, handling, and treatment of VOC-impacted soils, and shall describe associated notification requirements, monitoring requirements, soil handling protocols, and recordkeeping requirements. In the event that "VOC-contaminated soil" is identified as defined within Rule 1166, the soil shall be handled in accordance with the Rule and the associated Various Locations Plan. A project-specific Health and Safety Plan (HASP) shall also be prepared in accordance with California Occupational Safety and Health Administration (OSHA) standards and other applicable rules and regulations, which will incorporate appropriate health and safety precautions to be implemented to protect workers and the public from exposure to potentially hazardous substances that may be encountered during these earth working activities.** **As part of the SMP, the Project Applicant and/or the construction contractor(s) shall retain a qualified professional to**	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			prepare a site-specific HSP in accordance with federal Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1910.120) and California OSHA regulations (8 CCR Section 5192). The HSP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-disturbing activities from exposure to hazardous materials, including vapor and soil contamination.	
Threshold B: Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	**PPP HAZ-1:** As listed previously. **PDF HAZ-1: Vapor Intrusion Mitigation System (VIMS).** A Vapor Intrusion Mitigation System (VIMS) shall be incorporated into the Project design to prevent potential vapor intrusion risks.	~~Less than significant~~ **Potentially significant**	~~None required~~ **Mitigation Measure HAZ-1: Soil Management Plan (SMP) and Health and Safety Plan (HSP). As listed previously.**	Less than significant
Threshold C: Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?		No impact	None required	No impact
Threshold D: Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5		Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
and, as a result, create a significant hazard to the public or the environment?				
Threshold E: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?		Potentially significant	**Mitigation Measure ~~HAZ-4~~ HAZ-2: Outdoor lighting.** Any new outdoor lighting that is installed shall be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing. **Mitigation Measure ~~HAZ-5~~ HAZ-3: Prohibited Uses/Activities.** The following uses/activities are not included in the proposed project and shall be prohibited at this site: 1. Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator. 2. Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			towards a landing at an airport. 3. Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. (Such uses include landscaping utilizing water features, aquaculture, outdoor production of cereal grains, sunflower, and row crops, composting operations, wastewater management facilities, artificial marshes, trash transfer stations that are open on one or more sides, recycling centers containing putrescible wastes, construction and demolition debris facilities, fly ash disposal, and incinerators. 4. Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation. ~~5. Highly noise-sensitive outdoor nonresidential uses.~~ ~~6.~~5. Any use which results in a hazard to flight.~~, including physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations~~ **Mitigation Measure ~~HAZ-6~~ HAZ-4: Notice of**	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			Airport in Vicinity. The "Notice of Airport in Vicinity" shall be provided to all prospective purchasers and occupants of the property. ~~**Mitigation Measure HAZ-7:** Stormwater Basin Design and Airport Compatibility. Any proposed stormwater basins or facilities shall be designed and maintained to provide for a maximum 48-hour detention period following the design storm, and remain totally dry between rainfalls. Vegetation in and around the stormwater basins that would provide food or cover for birds is incompatible with airport operations and shall not be utilized in project landscaping. Trees shall be spaced so as to prevent large expanses of contiguous canopy, when mature. Landscaping in and around the stormwater basin(s) shall not include trees or shrubs that produce seeds, fruits, or berries.~~ ~~Landscaping in the stormwater basin, if not rip-rap, shall be in accordance with the guidance provided in ALUC "LANDSCAPING NEAR AIRPORTS" brochure, and the "AIRPORTS, WILDLIFE AND STORMWATER MANAGEMENT" brochure available at RCALUC.ORG which list acceptable plants from Riverside County Landscaping Guide or other alternative landscaping as may be recommended by a~~	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			~~qualified wildlife hazard biologist.~~ ~~A notice sign shall be permanently affixed to the stormwater basin with the following language: "There is an airport nearby. This stormwater basin is designed to hold stormwater for only 48 hours and not attract birds. Proper maintenance is necessary to avoid bird strikes". The sign shall also include the name, telephone number or other contact information of the person or entity responsible to monitor the stormwater basin.~~ **Mitigation Measure HAZ-5: Electromagnetic Component Notification. March Air Reserve Base shall be notified of any land use having electromagnetic radiation. Sources of electromagnetic radiation include radio wave transmission in conjunction with remote equipment inclusive of irrigation controllers, access gates, etc.**	
Threshold F: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?		No impact	None required	~~Less than significant~~ **No impact**
Threshold G: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death		No impact	None required	No impact

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
involving wildland fires?				
Cumulative	**PPP HAZ-2:** As listed previously **PPP HYD-1:** As listed previously	Potentially significant	**Mitigation Measure HAZ-1:** As listed previously. **Mitigation Measure HAZ-2:** As listed previously. **Mitigation Measure HAZ-3:** As listed previously. **Mitigation Measure HAZ-4:** As listed previously. **Mitigation Measure HAZ-5:** As listed previously. ~~**Mitigation Measure HAZ-6:** As listed previously.~~	Less than significant
5.12 Mineral Resources				
Threshold A: Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?		~~No impact~~ **Less than significant**	None required	~~No impact~~ **Less than significant**

2.2.2 Section 3.0, Project Description

Location: Page 3-45, Section 3.3.8, *Construction*, is revised as follows:

Explanation for Change and Discussion: Revised export values for consistency with updated Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Project development is estimated to take approximately 14 months, beginning April 2026 and concluding June 2027. Construction activities for the Project would occur over one phase and include demolition and removal of existing structures, foundations, asphalt/pavement, utilities, and other subsurface improvements; site preparation, which includes clearing any remaining infrastructure, utilities, and trenching for the new utilities and services; grading and excavation; building construction; and landscape installation, paving, and application of architectural coatings. Grading work of soils is expected to result in cut of 15,065 cubic yards (CY) and fill of 24,108 CY of soils for a net import of 9,043 CY. **Additionally, the site preparation phase is assumed to result in a maximum export of 500 CY of potentially contaminated soil and the demolition phase is anticipated to result in an export of 24,092 tons of debris.**

Location: Page 3-46, Section 3.5, *Discretionary Approvals and Permits*, is revised as follows:

Explanation for Change and Discussion: Added applicable responsible agencies for reference.

The City of Riverside is expected to use the information contained in this EIR for consideration of approvals related to and involved in the implementation of this Project. These include, but may not be limited to, the permits and approvals described below.

- Zoning Code (Map/Text) Amendment
- Development Agreement
- Tentative Parcel Map
- Design Review
- Certification of the Environmental Impact Report
- Approvals and permits necessary to execute the proposed Project, including but not limited to grading permit, building permit, etc.
- ~~In addition, the Project is subject to review and approval by the Riverside Airport Land Use Commission (ALUC) for the Zoning Code Map and text amendments.~~

The Following approvals are anticipated from responsible agencies:

- **Riverside Airport Land Use Commission (ALUC) approval of Project's proposed Zoning Code Map and text amendments.**
- **SCAQMD approval and issuance of permits for installation and operation of backup generators and fire pumps as well as compliance with all applicable regulatory requirements related to air quality and toxic air contaminates.**

2.2.3 Section 5.3, Air Quality

Location: Page 5.3-8, Section 5.3.2.3, *Regional Regulations*, is revised as follows:

Explanation for Change and Discussion: Revised to include additional SCAQMD Rules and Regulations included per response to comment letter A1.

SCAQMD Rules and Regulations

All projects are subject to SCAQMD rules and regulations. Specific rules applicable to the Project include the following:

Rule 201- Permit to Construct. A person shall not construct, alter, or operate equipment that may cause the issuance of air contaminants without first obtaining a permit from SCAQMD. This permitting requirement ensures review of potential air quality impacts prior to equipment installation or operation.

Rule 203 – Permit to Operate. A person shall not operate or use any equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants, or the use of which may reduce or control the issuance of air contaminants, without first obtaining a written permit to operate from the Executive Officer or except as provided in Rule 202. The equipment or agricultural permit unit shall not be operated contrary to the conditions specified in the permit to operate.

Rule 401 – Visible Emissions. A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines.

Rule 402 – Nuisance. A person shall not discharge from any source whatsoever such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any such

persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

Rule 403 – Fugitive Dust. SCAQMD Rule 403 governs emissions of fugitive dust during and after construction. Compliance with this rule is achieved through application of standard Best Management Practices (BMP), such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.

Rule 403 requires project applicants to control fugitive dust using the best available control measures such that dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating an off-site nuisance. Applicable Rule 403 dust suppression (and PM10 generation) techniques to reduce impacts on nearby sensitive receptors may include, but are not limited to, the following:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Water active sites at least three times daily. Locations where grading is to occur shall be thoroughly watered prior to earthmoving.
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour (mph) or less.
- Suspend all grading activities when wind speeds (including instantaneous wind gusts) exceed 25 mph.
- Provide bumper strips or similar best management practices where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Replant disturbed areas as soon as practical.
- Sweep on-site streets (and off-site streets if silt is carried to adjacent public thoroughfares) to reduce the amount of particulate matter on public streets. All sweepers shall be compliant with SCAQMD Rule 1186.1, Less Polluting Sweepers.

Rule 445 – Wood Burning Devices. This rule prohibits the installation of wood-burning devices in any new development and is intended to reduce particulate matter emissions from such devices. Therefore, all new development must comply with SCAQMD Rule 445.

Rule 461 – Gasoline Transfer. This rule governs the transfer of gasoline into and out of stationary storage tanks and vehicle fuel tanks within the SCAQMD. The rule requires the use of CARB certified enhanced vapor recovery systems to control VOCs emissions during gasoline transfer operations. The rule establishes equipment, operation, maintenance, testing, and recordkeeping requirements for both storage tanks and dispensing systems to ensure they are vapor- and liquid-tight.

Rule 481 – Spray Coating. This rule applies to all spray painting and spray coating operations and equipment and states that a person shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:

- The spray coating equipment is operated inside a control enclosure, which is approved by the Executive Officer. Any control enclosure for which an application for permit for new construction, alteration, or change of ownership or location is submitted after the date of adoption of this rule shall be exhausted only through filters at a design face velocity not less than 100 feet per minute nor greater than 300

feet per minute, or through a water wash system designed to be equally effective for the purpose of air pollution control.

- Coatings are applied with high-volume low-pressure, electrostatic and/or airless spray equipment.
- An alternative method of coating application or control is used which has effectiveness equal to or greater than the equipment specified in the rule.

Rule 1108 - Volatile Organic Compounds. This rule governs the sale, use, and manufacturing of asphalt and limits the volatile organic compound (VOC) content in asphalt used in the Basin. This rule also regulates the VOC content of asphalt used during construction. Therefore, all asphalt used during construction of the Project must comply with SCAQMD Rule 1108.

Rule 1110.1 – Stationary Combustion Emissions. This rule governs emissions from stationary internal combustion engines and establishes emission limits for NOx, VOCs, and CO. This rule requires monitoring and testing to demonstrate compliance.

Rule 1113 – Architectural Coatings. No person shall apply or solicit the application of any architectural coating within the SCAQMD with VOC content in excess of the values specified in a table incorporated in the Rule.

Rule 1143 – Paint Thinners and Solvents. This rule governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content. This rule regulates the VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule.

Rule 1166 – VOC Emissions from Soil Excavation and Handling. This rule sets requirements to control the emission of VOCs from excavating, grading, handling, and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition. Pursuant to SCAQMD Rule 1166, excavating or grading soil containing VOC materials shall:

- **Apply for, obtain, and operate pursuant to a mitigation plan pursuant to the requirements of SCAQMD Rule 1166. Monitor for VOC contamination at least once every 15 minutes commencing at the beginning of excavation or grading and record all VOC concentration readings. Handling VOC-contaminated soil at or from an excavation or grading site shall segregate VOC-contaminated stockpiles from non-VOC contaminated stockpiles such that mixing of the stockpiles does not take place. VOC contaminated soil stockpiles shall be sprayed with water and/or approved vapor suppressant and adequately cover them with plastic sheeting for all periods of inactivity lasting more than one hour. A daily visual inspection shall be conducted of all covered VOC contaminated soil stockpiles to ensure the integrity of the plastic covered surfaces. Contaminated soil shall be treated or removed from an excavation or grading site within 30 days from the time of excavation.**

Rule 1470 – Requirements for Stationary Diesel-fueled Internal Combustion and Other Compression Ignition Engines. This rule applies to any person who owns or operates a stationary compression ignition engine in the SCAQMD with a rated brake horsepower greater than 50. This rule sets operational hour requirement stating that new stationary emergency diesel engines shall not operate more than 50 hours a year for maintenance and testing. Additionally, under this rule, emergency generators shall operate for a maximum of 200 hours a year.

Rule 2305 – Warehouse Associated Mobile Sources. This rule outlines the reduction of local and regional emissions of nitrogen oxides and particulate matter, and to facilitate local and regional emission reductions with warehouses and associated mobiles sources. As the Project proposes one 99,850-SF building and one 99,950-SF building, it would thus be exempt from this rule as it applies to warehouses with greater than or equal to 100,000 SF of indoor floor space in any single building.

Regulation XIII – New Source Review. This regulation governs New Source Review (NSR) for new, relocated, or modified facilities that emit air contaminants. This regulation requires the application of Best Available Control Technology (BACT), analysis of potential emission increases, and the use of emission reduction credits to offset increases in nonattainment pollutants.

Location: Page 5.3-23, Section 5.3.6, *Environmental Impacts*, is revised as follows:

Explanation for Change and Discussion: Revised export values for consistency with updated Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Construction of the Project would occur over an approximately 14-month period. Construction activities associated with the Project would result in emissions of CO, ROG, NOx, SOx, PM10, and PM2.5. Pollutant emissions associated with construction would be generated from the following construction activities: (1) demolition, (2) site preparation, (3) grading, (4) building construction, (5) paving, and (6) architectural coatings. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants. In addition, emissions would result from the import of 9,043 CY of soil during the grading phase ~~and from export of 24,092 tons of debris during the demolition of the existing building~~, **a maximum export of 500 CY of potentially contaminated soil during the site preparation phase, and export of 24,092 tons of debris during the demolition phase.**

Location: Page 5.3-24, Section 5.3.6, *Environmental Impacts*, is revised as follows:

Explanation for Change and Discussion: Revised emissions values for consistency with updated Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Table 5.3-1: Regional Project Construction Emissions

Construction Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
2026						
Demolition	2.7	44.9	25.6	0.2	24.1	5.4
Site Preparation	3.9	~~34.7~~ **35.9**	~~32.0~~ **32.2**	0.1	~~7.7~~ **8.0**	~~4.4~~ **4.5**
Grading	3.5	33.0	30.5	0.1	5.0	2.6
Building Construction	1.5	12.1	20.4	<0.1	1.8	0.7
Maximum Daily Emissions 2026	3.9	44.9	~~32.0~~ **32.2**	0.2	24.1	5.4
2027						
Building Construction	1.4	11.6	18.6	<0.1	1.8	0.7
Paving	1.4	7.0	10.7	<0.1	0.5	0.3
Architectural Coating	54.7	1.2	2.3	<0.1	0.2	0.1
Maximum Daily Emissions 2027	54.7	11.6	18.6	<0.1	1.8	0.7
Maximum Daily Emission 2026-2027	**54.7**	**44.9**	~~**32.0**~~ **32.2**	**0.2**	**24.1**	**5.4**
SCAQMD Significance Thresholds	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: ROGs = reactive organic gases, CO = carbon monoxide, SO_2 = sulfur dioxide, NOx = nitrogen oxides, PM_{10} = particulate matter (10 microns), $PM_{2.5}$ = particulate matter (2.5 microns)
Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

Location: Page 5.3-25, Section 5.3.6, *Environmental Impacts*, is revised as follows:

Explanation for Change and Discussion: Revised emissions values for consistency with updated Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Table 5.3-2: Regional Project Operational Emissions

Operational Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Mobile	3.3	28.1	42.1	0.3	16.8	4.7
Area	6.2	0.1	8.7	<0.1	~~<0.1~~ **0.0**	~~<0.1~~ **0.0**
Energy	0.1	2.1	1.8	<0.1	0.2	0.2
Off-Road	<0.1	17.7	176.2	<0.1	<0.1	<0.1
Stationary	1.6	4.4	4.0	<0.1	0.2	0.2
Total Project Operational Emissions	**11.3**	**52.4**	**232.7**	**0.3**	**17.2**	**5.1**
Existing Use Operational Emissions	1.9	31.6	~~61.0~~ **65.3**	0.4	23.1	6.3
Net New Emissions	**9.3**	**20.8**	~~**171.8**~~ **167.4**	**<0.1**	**-6.0**	**-1.3**
SCAQMD Significance Thresholds	*55*	*55*	*550*	150	150	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: ROGs = reactive organic gases, CO = carbon monoxide, SO_2 = sulfur dioxide, NOx = nitrogen oxides, PM_{10} = particulate matter (10 microns), $PM_{2.5}$ = particulate matter (2.5 microns)
Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Table 5.3-3: Localized Project Construction Emissions

Construction Activity	Maximum Daily Localized Emissions (pounds/day)			
	NOx	CO	PM_{10}	$PM_{2.5}$
2026				
Demolition	20.7	19.0	17.9	3.4
Site Preparation	34.6	31.0	7.4	4.3
Grading	30.0	28.7	4.1	2.3
Building Construction	10.7	28.1	0.8	0.8
Maximum Daily Emissions 2026	34.6	31.0	17.9	4.3
2027				
Building Construction	10.2	14.0	0.4	0.3
Paving	6.9	10.0	0.3	0.3
Architectural Coating	1.1	1.5	<0.1	<0.1
Maximum Daily Emissions 2027	10.2	14.0	0.4	0.3
Maximum Daily Emission 2026-2027	**34.6**	**31.0**	**17.9**	**4.3**
SCAQMD Localized Significance Thresholds	~~45.17~~ **268**	~~6,285.3~~ **1,827.7**	~~89~~ **33.3**	~~28.3~~ **8.7**

Construction Activity	Maximum Daily Localized Emissions (pounds/day)			
	NOx	CO	PM_{10}	$PM_{2.5}$
Threshold Exceeded?	**No**	**No**	**No**	**No**

Notes: NOx = nitrogen oxides, CO = carbon monoxide, PM_{10} = particulate matter (10 microns), $PM_{2.5}$ = particulate matter (2.5 microns).
Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

Location: Page 5.3-32, Section 5.3.9, *Project Design Features*, is revised as follows:

Explanation for Change and Discussion: Revised to include Project Design Features the Project Applicant is voluntarily including to further reduce potential Air Quality impacts.

5.3.9 Project Design Features

~~None.~~

PDF AQ-1: The Project would use light-colored paving and roofing materials. This design feature would reduce heat absorption, thereby lowering cooling demands and associated energy use, which in turn would reduce operational air quality impacts. No quantitative credit was taken in the air quality analysis for this design feature.

PDF AQ-2: The Project would use Energy Star heating, cooling, and lighting devices and appliances. This design feature would increase energy efficiency and reduce electricity demand, which in turn would reduce operational air quality impacts. No quantitative credit was taken in the air quality analysis for this design feature.

PDF AQ-3: The Project would be designed to include the installation of signs at every truck exit providing directional information to the trucks' routes. This design feature would prevent nearby sensitive receptors from further exposure to criteria pollutants during the operation of the Project. No quantitative credit was taken in the air quality analysis for this design feature.

PDF AQ-4: The Project would have a truck check-in point inside of the Project site, consistent with best practices for siting and designing warehouse facilities. This design feature would help manage truck circulation on-site and reduce idling on surrounding roadways, thereby minimizing operational exposure of nearby sensitive receptors to criteria pollutants. No quantitative credit was taken in the air quality analysis for this design feature.

PDF AQ-5: The Project would be designed to provide overnight truck parking inside of the Project site. This design feature would encourage trucks to not park overnight near sensitive receptors and prevent further exposure to criteria pollutants during the operation of the Project. No quantitative credit was taken in the air quality analysis for this design feature.

2.2.4 Section 5.5, Cultural Resources

Location: Page 5.5-13, Section 5.5.8, Existing Regulations and Plans, Programs, or Policies, is revised as follows:

Explanation of Change and Discussion: Revised PPP CUL-1 per City's standard language.

5.5.8 Existing Regulations and Plans, Programs, or Policies

Existing Regulations

- California Health and Safety Code Section 7050.5
- Public Resources Code Section 5097.98

Plans, Programs, or Policies

The following Plans, Programs, and Policies (PPPs) that are listed below would reduce impacts related to cultural resources. These actions will be included in the Project's Mitigation Monitoring and Reporting Program:

PPP CUL-1: ~~**Human Remains.** If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5. Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the San Bernardino County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. If the San Bernardino County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted by the Coroner within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant." The Most Likely Descendant shall then make recommendations and engage in consultation with the property owner concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.~~ **Discovery of Human Remains: In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts.**

The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The County Coroner will notify the Native American Heritage Commission in accordance with California Public Resources Code 5097.98.

According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052) determined in consultation between the Project proponent and the MLD. In the event that the Project proponent and the MLD are in disagreement regarding the disposition of the remains, State law will apply and the median and decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)).

2.2.5 Section 5.6, Energy

Location: Page 5.6-6, Section 5.6.6, *Environmental Impacts*, is revised as follows:

Explanation for Change and Discussion: Revised fuel construction values for consistency with updated Air Quality, Energy, and GHG Impact Analysis (Appendix B).

The energy analysis modeling for the proposed Project (included as Appendix B) shows that construction-related use of construction vehicles and off-road equipment would utilize approximately ~~59,818~~ **75,047** gallons of diesel fuel and ~~15,304~~ **22,470** gallons of gasoline, as detailed in Table 5.6-1 below.

Table 5.6-4: Construction Fuel Consumption

Construction Source	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
Construction Vehicles	~~21,839~~ **37,068**	~~15,304~~ **22,470**
Off-Road Construction Equipment	37,979	0
Total	~~**59,818**~~ **75,047**	~~**15,304**~~ **22,470**

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

2.2.6 Section 5.8, Greenhouse Gas Emissions

Location: Page 5.8-11 to 5.8-12, Section 5.8.6, *Environmental Impacts*, is revised as follows:

Explanation for Change and Discussion: Revised emissions values for consistency with updated Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Construction

Implementation of the proposed Project would generate GHG emissions from demolition, construction activities, haul trips, vendor trips, and construction worker vehicle trips. For construction emissions, the SCAQMD recommends amortizing emissions over 30 years by calculating the total GHG emissions for the construction activities, dividing it by a 30-year project life, then adding that number to the annual operational phase GHG emissions, which is done within this analysis. Table 5.8-1 provides the estimated construction emissions from the Project. As shown, the Project would emit a total of ~~844~~ **850** Annual MTCO2e over the duration of construction, with 2026 having the highest emission level (~~821~~ **826** MTCO2e). Amortized over 30 years, the Project's construction emissions would be approximately 28 MTCO2e per year.

Table 5.8-5: Project Construction Greenhouse Emissions

Activity	Annual GHG Emissions ($MTCO_2e$)
2026	~~821~~ **826**
2027	23
Total Emissions	~~**844**~~ **850**
Total Emissions Amortized Over 30 Years	**28**

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

Operation

The proposed Project would construct two warehouse buildings with a combined total building square footage of 199,850 square feet (SF) that would accommodate approximately 194 employees. Operation of the proposed Project would generate GHG emissions from vehicle trips, electricity and natural gas consumption, water and wastewater transport (the energy used to pump water), and solid waste generation. GHG emissions from electricity consumed by the proposed Project would be generated off site by fuel combustion at the electricity provider. GHG emissions from water transport are also indirect emissions resulting from the energy required to transport water from its source. GHG emissions from solid waste disposal are associated with the anaerobic breakdown of material.

The Air Quality, Energy, and GHG Impact Analysis prepared for the proposed Project (Appendix B) describes that the GHG emissions generated from the proposed Project at buildout are primarily associated with non-construction related mobile sources, such as vehicle and truck trips. The annual GHG emissions associated with the proposed Project are summarized in Table 5.8-2. As shown, operation of the Project, including amortized construction emissions, would generate a net total of approximately ~~7,272~~ **7,269** MTCO2e per year, which would not exceed the screening threshold of 10,000 MTCO2e per year. The existing operational GHG emissions from the existing buildings were estimated to be 1,785 MTCO2e. As such, the net new emissions (proposed Project minus existing) from the proposed Project are ~~5,457~~ **5,484** MTCO2e per year. The proposed Project's net and total GHG emission results are both below the SCAQMD significance threshold of 10,000 MTCO2e per year. Therefore, impacts would be **less than significant**.

Table 5.8-6: Project Greenhouse Gas Emissions

Activity	Annual GHG Emissions ($MTCO_2e$)
Project Operational Emissions	
Mobile	5,426
Area	4
Energy	921
Water	127
Waste	74
Refrigeration	183
Off-Road	461
Stationary	~~18~~ **45**
Total Project Gross Operational Emissions	**7,214**
Amortized Construction Emissions	**28**
Total Project Emissions	~~**7,242**~~ **7,269**
Existing Emissions	1,785
Net New Emissions (Gross - Existing)	~~**5,457**~~ **5,484**
Significance Threshold	10,000
Threshold Exceeded?	**No**

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

Location: Page 5.8-13 to 5.8-16, Section 5.8.6, *Environmental Impacts*, is revised as follows:

Explanation for Change and Discussion: Revised typo for consistency with updated Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Table 5.8-7: Project Consistency with the CARB 2022 Scoping Plan

Action	Consistency
GHG Emissions Reductions Relative to the SB 32 Target	
40% Below 1990 levels by 2030.	**Consistent.** The Project would comply with the 2022 Title 24, Part 6 energy requirements, as well as Title 24, Part 11 building standards, along with other local and State initiatives that aim to achieve the 40% below 1990 levels by 2030 goal.
Smart Growth/Vehicle Miles Traveled (VMT)	
VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.	**Consistent.** The proposed Project would provide bicycle racks and bicycle parking spaces to encourage alternative modes of transportation. The Project is consistent with the growth and land use assumptions in the Southern California Association of Government's 2022 Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy (which was utilized for growth estimates in the CARB Scoping Plan) including reductions in VMT per capita. The plan aims to reduce VMT per capita by 25% below 2019 levels by 2030 and 30% by 2045, which aligns with targets set in the CARB Scoping Plan. Thus, the Project would not interfere with VMT reduction targets and measures.
Light-Duty Vehicle (LDV) Zero-Emission Vehicles (ZEVs)	
100% of LDV sales are ZEV by 2035.	**Consistent.** The proposed Project is a speculative industrial building that could potentially involve the manufacturing and storage of LDV ZEVs. The future tenant would be required to comply with the CARB's Advanced Clean Truck Regulation that requires truck manufacturers to transition from diesel trucks to zero emission trucks, and would be designed and constructed in accordance with the 2022 Title 24 Part 6 and Part 11 requirements, which include constructing infrastructure to allow for electric vehicle charging.
Truck ZEVs	
100% of medium- and heavy-duty vehicle (MHDV) sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report).	**Consistent.** The proposed Project is a speculative industrial building that could potentially involve the manufacturing and storage of MHDV ZEVs. The future tenant would be required to comply with the CARB's Advanced Clean Truck Regulation that would require truck manufacturers to transition from diesel trucks to zero emission trucks, and would be designed and constructed in accordance with the 2022 Title 24 Part 6 and Part 11 requirements, which include constructing infrastructure to allow for electric vehicle charging.
Aviation	
20% of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	**Not Applicable.** The proposed Project would not utilize aviation fuel.

Action	Consistency
Ocean-going Vessels (OGV)	
2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25% of OGVs utilize hydrogen fuel cell electric technology by 2045.	**Not Applicable.** The proposed Project would not utilize any OGVs.
Port Operations	
100% of cargo handling equipment is zero-emission by 2037. 100% of drayage trucks are zero emission by 2035.	**Not Applicable.** The proposed Project would not impact any operations at any ports.
Freight and Passenger Rail	
100% of passenger and other locomotive sales are ZEV by 2030. 100% of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	**Not Applicable.** The proposed Project would not involve any rail operations.
Oil and Gas Extraction	
~~**Not Applicable.** The proposed Project would not involve oil and gas extraction operations.~~ **Reduce oil and gas extraction operations in line with petroleum demand by 2045.**	**Not Applicable.** The proposed Project would not involve oil and gas extraction operations.
Petroleum Refining	
Carbon capture and sequestration (CCS) on majority of operations by 2030, beginning in 2028. Production reduced in line with petroleum demand.	**Not Applicable.** The proposed Project would not involve any petroleum refining.
Electricity Generation	
Sector GHG target of 38 million metric tons of carbon dioxide equivalent ($MTCO_2e$) in 2030 and 30 $MTCO_2e$ in 2035. Retail sales load coverage134 20 gigawatts (GW) of offshore wind by 2045. Meet increased demand for electrification without new fossil gas-fired resources.	**Consistent.** The Project would not generate electricity. The Project would comply with the 2022 Title 24, Part 6 building energy including efficiency and renewable energy requirements.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	**Consistent.** The Project would comply with the 2022 Title 24, Part 6 building energy requirements, including installing electrical wiring for all built in appliances.
Existing Residential Buildings	
80% of appliance sales are electric by 2030 and 100% of appliance sales are electric by 2035. Appliances are replaced at end of life such that by 2030 there are 3 million all-electric and electric-ready homes—and by 2035, 7 million homes—as well as contributing to 6 million heat pumps installed statewide by 2030.	**Not Applicable.** The proposed Project would not involve the operation any existing residential buildings.
Existing Commercial Buildings	
80% of appliance sales are electric by 2030, and 100% of appliance sales are electric by 2045. Appliances are replaced at end of life, contributing to 6 million heat pumps installed statewide by 2030.	**Consistent.** The Project would be consistent and comply with Title 24 Section 6 requirements for commercial buildings, including complying with 100% electric appliances beginning in 2029, replacing an existing building that was not constructed to be consistent with the current 2022 Title 24 Building Code requirements.

Action	Consistency
Food Products	
7.5% of energy demand electrified directly and/or indirectly by 2030; 75% by 2045.	**Consistent.** The Project would include up to 20% of the total building area for cold storage, which has the potential to store food products. The proposed Project would comply with the 2022 Title 24 Building Codes in Section 6 and would be required to meet increasing standards set by the State. Therefore, the Project would be consistent with meeting current and future policies concerning the storage of food products as speculative cold storage warehouses.
Construction Equipment	
25% of energy demand electrified by 2030 and 75% electrified by 2045.	**Consistent.** The proposed Project would be required to use construction equipment that is registered by CARB and meet CARB's standards. CARB sets its standards to be in line with the goal of reducing energy demand by 25% in 2030 and 75% in 2045.
Chemicals and Allied Products; Pulp and Paper	
Electrify 0% of boilers by 2030 and 100% of boilers by 2045. Hydrogen for 25% of process heat by 2035 and 100% by 2045. Electrify 100% of other energy demand by 2045.	**Consistent.** As the Project proposes speculative industrial buildings, there is a potential for the Project to involve the production and/or storage of chemicals and allied products like pulp and paper. The Project would comply with the energy demands of the 2022 Title 24 Section 6 Building Codes and would comply with the electricity and hydrogen requirement by 2045 for the production of chemicals and allied products.
Stone, Clay, Glass, and Cement	
CCS on 40% of operations by 2035 and on all facilities by 2045. Process emissions reduced through alternative materials and CCS.	**Consistent.** As the Project proposes speculative industrial buildings, there is a potential for the Project to involve the production and/or storage of stone, clay, glass and/or cement. The Project would comply with the energy demands of the 2022 Title 24 Section 6 Building Codes and would promote the implementation and use of CCS for operations by 2035 and on all operations and facilities by 2045.
Other Industrial Manufacturing	
0% energy demand electrified by 2030 and 50% by 2045.	**Consistent.** The proposed Project is a speculative industrial building that could allow for manufacturing. A future manufacturing tenant would be required to meet the energy demand goals of 50% by 2045, and the proposed Project would be constructed to comply with Title 24, Part 6 Building energy requirements, including increases in onsite energy generation requirements and improved insulation reducing energy consumption in industrial manufacturing operations.
Combined Heat and Power	
Facilities retire by 2040.	**Not Applicable.** The proposed Project would not involve any existing combined heat and power facilities.
Agriculture Energy Use	
25% energy demand electrified by 2030 and 75% by 2045.	**Not Applicable.** The proposed Project would not involve any agricultural uses.
Low Carbon Fuels for Transportation	
Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	**Not Applicable.** The proposed Project would not involve any production of biofuels.

Action	Consistency
Low Carbon Fuels for Buildings and Industry	
In 2030s, biomethane135 blended in pipeline. Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040. In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters.	**Not Applicable.** The proposed Project would not involve any production of fuels for buildings and industry.
Non-Combustion Methane Emissions	
Increase landfill and dairy digester methane capture. Some alternative manure management deployed for smaller dairies. Moderate adoption of enteric strategies by 2030. Divert 75% of organic waste from landfills by 2025. Oil and gas fugitive methane emissions reduced 50% by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand.	**Not Applicable.** The proposed Project would not involve any production of non-combustion methane emissions or organic waste.
High Global Warming Potential (GWP) Emissions	
Low GWP refrigerants introduced as building electrification increases, mitigating hydrofluorocarbon (HFC) emissions.	**Consistent.** The proposed Project includes refrigeration and would be consistent with the 2022 Title 24 Section 6 Building Codes for 2022 and would be required to meet increasing standards set by the State. Therefore, the Project would be consistent with meeting current and future policies concerning the use of low GWP refrigerants.

Location: Page 5.8-17, Section 5.8.6, *Environmental Impacts*, is revised as follows:

Explanation for Change and Discussion: Revised to include an additional Policy for consistency with updated Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Table 5.8-8: Project Consistency with the City General Plan Policies Related to GHGs

General Plan Goal or Policy	Consistency
Policy AQ-1.10: Encourage job creation in job-poor areas as a means of reducing vehicle miles traveled.	**Consistent.** As discussed in Section 5.14, *Population and Housing*, the City of Riverside is housing-rich, meaning that more housing is provided than employment opportunities in the area. Implementation of the proposed Project would create up to an additional 194 jobs. Therefore, the proposed Project would create jobs in a job-poor area, consistent with this policy.
Policy AQ-1.15: Establish land use patterns that reduce the number and length of motor vehicle trips and promote alternative modes of travel.	**Consistent.** As discussed in Section 5.17, *Transportation*, existing bus services near the Project site would allow Project site residents convenient access to transit.
Policy AQ-5.3: Continue and expand use of renewable energy resources such as wind, solar, water, landfill gas, and geothermal sources.	**Consistent.** The Project would comply with the 2022 Title 24, Part 6 building energy including efficiency and renewable energy requirements.
Policy AQ-5.6: Support the use of automated equipment for conditioned facilities to control heating and air conditioning.	**Consistent.** The Project will comply with the latest Title 24 and CALGreen code that support efficient heating and air conditioning systems.

General Plan Goal or Policy	Consistency
Policy AQ-5.7: Require residential building construction to meet or exceed energy use guidelines in Title 24 of the California Administrative Code.	**Not Applicable. The proposed Project does not propose residential buildings.**
Policy AQ-8.17: Develop measures to encourage that a minimum of 40% of the waste from all construction sites throughout Riverside be recycled by the end of 2008.	**Consistent.** The proposed Project would comply with the latest CALGreen code, which requires a minimum of 65 percent of construction waste be recycled.

2.2.7 Section 5.9, Hazards and Hazardous Materials

Location: Page 5.9-22, Section 5.9.6, *Environmental Impacts*, is revised as follows:

Explanation for Change and Discussion: Revised nearest runway based on more detailed information provided in the May 5, 2025, RCALUC director's determination letter for accuracy and consistency.

The Project site is located approximately 2.9 miles east of the Flabob Airport, a small public-use airport in the City of Jurupa Valley. The **nearest runway at** Flabob Airport**, Runway 6-24,** has an ~~easterly runway~~ elevation of ~~768~~ **approximately 750** feet above mean sea level (AMSL). In June 11, 2024, an Application for Major Land Use Action Review was submitted to the Riverside County Airport Land Use Commission (ALUC) for the proposed Project pursuant to ALUC Review Procedures. On May 5, 2025, ALUC determined that FAA review is required for structures exceeding 1,039 feet AMSL at the project's distance from the Flabob Airport runway, however, the proposed building's top elevation is 935 feet AMSL, so FAA Obstruction Evaluation Service review is not warranted.

Location: Page 5.9-24, Section 5.9.7, Cumulative Impacts, is revised as follows:

Explanation for Change and Discussion: Revised reference to closest cumulative projects for accuracy and consistency.

The severity of potential hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. As shown in Figure 5-1, Cumulative Projects, in Section 5.0, Environmental Impact Analysis, of this Draft EIR, the**re are two** closest cumulative project**s, both** ~~is~~ located at 2610 Durahart Street, approximately 0.25 miles east of the Project site.

The commencement of construction of the adjacent cumulative project is unknown; however, it is possible that construction activities involving hazardous materials from both the proposed Project and the adjacent cumulative project or other nearby cumulative projects would occur simultaneously that could have the potential to cumulatively contribute to an impact. However, all hazardous materials users and transporters, as well as hazardous waste generators and disposers are subject to regulations that require proper transport, handling, use, storage, and disposal of such materials to ensure public safety, which are verified by the City during the construction and development permitting process.

Thus, if hazardous materials are found to be present on any of the cumulative or future project sites, appropriate remediation activities would be required pursuant to standard federal, State, and regional regulations that would reduce potential impacts, such as the activities which would be done by the proposed Project. In addition, regulatory compliance **and implementation of Mitigation Measure HAZ-1**, the SMP and HSP would be implemented for the proposed Project to ensure that hazardous soil from the site would be handled and disposed of in a manner which would reduce the potential of the proposed Project to result in a hazard to the public or environment that could cumulatively combine. As such, the potential impacts from the proposed Project would be **less than significant** and **not cumulatively considerable**.

In regard to potential cumulative impacts associated with the Project's proximity to Flabob Airport and March Air Reserve Base/Inland Port Airport, future development projects in the area, like the proposed Project, would be subject to consistency review by ALUC. As part of this process, ALUC would provide conditions to ensure that future projects are designed and operated in a manner that avoids significant impacts related to airport safety and land use compatibility. With implementation of Mitigation Measures HAZ-2 through HAZ-5, the proposed Project would not result in significant impacts, and its contribution to cumulative impacts related to airport proximity would not be cumulatively considerable.

2.2.8 Section 5.17, Transportation

Location: Page 5.17-7, Section 5.17.6, *Environmental Impacts*, is revised as follows:

Explanation for Change and Discussion: Revised to include consistency with transportation related General Plan policies.

City of Riverside General Plan

The proposed Project is also consistent with the General Plan designations of the site. The Project site has a General Plan land use designation Industrial (I). The City of Riverside General Plan states that the primary intent of the Industrial land use designation is to allow for manufacturing and wholesaling; support commercial uses; and warehouse and distribution facilities only at specific locations. Once approved by the Development Agreement, the Project site would be within one of these specific locations. The Project proposes to construct two new industrial buildings on a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue) that would support warehouse and office uses. No development is proposed on 1989 Massachusetts Avenue. As described in Section 3.0, *Project Description*, a warehouse is used for the storage, receiving, shipping or wholesaling of goods and merchandise, and any incidental or accessory activities. The proposed light industrial warehouses are consistent with the intended uses of the Industrial land use designation. **In addition, the Project would be consistent with the following applicable City of Riverside 2025 General Plan Circulation and Community Mobility Element Policies: CCM-2.2, CCM-2.3, CCM-2.4, CCM-2.7, CCM-5.2, CCM-6.2, CCM-9.10, CCM-10.12, CCM-12.1, CCM-12.2, CCM-13.1, CCM-13.3.** As such, the proposed Project would not conflict with the City of Riverside General Plan, and **no impact** would occur.

2.2.9 Section 5.19, Utilities

Location: Page 5.19-13, Section 5.19.4.5, *Stormwater Drainage Environmental Impacts*, is revised as follows:

Explanation for Change and Discussion: Revised the number and location description of the Project's proposed on-site underground detention/infiltration systems to correct discrepancies and ensure document consistency.

As stated above, the northern portion of the Project site is developed with two buildings and asphalt concrete while the southern portion of the site is undeveloped and pervious. In the existing condition, stormwater on the northern portion of the site is directed to existing on-site v-gutters and is conveyed to Roberta Street and Kansas Avenue. Stormwater flow for the southern portion of the site is overland flow that is generally conveyed in the southeast-to-northwest direction to Kansas Avenue. Off-site flows are directed to an existing gutters that runs along Kansas Avenue. The proposed Project would collect drainage via proposed grate inlets and catch basins, which would convey storm water to an on-site underground storm drain system. The storm drain system would discharge to ~~one~~ **two** proposed on-site underground detention/infiltration system**s**. ~~This d~~**Detention**/infiltration ~~s~~**S**ystem **A** would be located under the passenger drive aisle in the ~~south~~**north**west portion of the site ~~adjacent to Building 2~~ and would direct overflow to ~~Kansas Avenue~~

Roberta Steet. Detention/Infiltration System B would be located beneath the truck court of Building 1 and would direct overflow to Kansas Avenue. In the current condition, the existing 100-year, 3-hour flow is 4.56 cubic square feet (cfs) on Roberta Street and 12.41 cfs on Kansas Avenue. Upon completion of the proposed Project, the 100-year, 3-hour flow would be 2.78 cfs on Roberta Street and 7.67 cfs on Kansas Avenue, lower than the existing on-site flows (Appendix I, Page 5). Therefore, the proposed stormwater system would provide improved infiltration compared to existing conditions.

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3. Response to Comments

This section of the Final Environmental Impact Report (FEIR; Final EIR) for the Massachusetts Point Project (Project) includes a copy of all comment letters that were submitted during the public review period for the Draft Environmental Impact Report (DEIR), along with responses to comments in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088. The 45-day review period for the DEIR began on June 26, 2025, and ended on August 11, 2025. A total of three comment letters were received in response to the DEIR during the 45-day public review period. Responses to all three comment letters are provided below.

The responses amplify or clarify information provided in the DEIR and/or refer the reader to the appropriate place in the document where the requested information can be found. Comments that are not directly related to environmental issues (e.g., opinions on the merits of the Project unrelated to its environmental impacts) are noted for the record. Where text changes in the DEIR are warranted based on comments received, updated Project information, or other information provided by City staff, those changes are noted in the response to comment and the reader is directed to Section 2.0, *Errata*, of this FEIR.

These changes to the analysis contained in the DEIR represent only minor clarifications/amplifications and do not constitute significant new information. In accordance with CEQA Guidelines Section 15088.5, recirculation of the DEIR is not required.

All written comments received on the DEIR are listed in Table 3-1. All comment letters received on the DEIR have been coded with a number to facilitate identification and tracking. The comment letters were reviewed and divided into individual comments, with each comment containing a single theme, issue, or concern. Individual comments and the responses to them were assigned corresponding numbers. To aid readers and commenters, electronically bracketed comment letters have been reproduced in this document with the corresponding responses provided immediately following each comment letter.

Table 3-1: Comments Received on the DEIR

Comment Letter	Agency/Organization/Commenter	Date
Agencies		
A1	South Coast Air Quality Management District (SCAQMD)	August 7, 2025
A2	Riverside County Airport Land Use Commission (ALUC)	July 21, 2025
Organizations		
O1	Sierra Club and R-NOW	August 11, 2025

To finalize the EIR for the Project, the following responses were prepared to address these comments.

Comment Letter A1: South Coast Air Quality Management District, Dated August 7, 2025

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL: August 07, 2025
cassadzadeh@riversideca.gov
Candice Assadzadeh, Senior Planner
City of Riverside
Community & Economic Development Department Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522

Draft Environmental Impact Report (EIR) for the Proposed Massachusetts Point Project (Proposed Project) (SCH No.: 2024120391)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Riverside is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments, organized by topic of concern.

Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project site encompasses approximately 14.42 acres[1] and consists of demolishing the existing structures and constructing two light industrial buildings for a total of 199,850 square feet (sf) of warehouse and office uses on approximately 10.21 acres.[2] Building 1 would consist of 99,900 sf with 17 dock doors along the southern side of the building, and Building 2 would consist of 99,950 sf with 22 dock doors along the northern side of the building.[3] The Proposed Project assumes 20 percent (%) of the warehouses for cold storage.[4] The Proposed Project site is located at 2626 Kansas Avenue, 2069 Massachusetts Avenue, and 1989 Massachusetts Avenue.[5] Based on the review of the aerial photograph, the nearest sensitive receptor (e.g., residence) is approximately 680 feet northeast of the Proposed Project site. Construction of the Proposed Project is anticipated to take approximately 14 months, with operations beginning in 2027.[6] A1.1

South Coast AQMD Comments

Incorrect Land Use Type Used in CalEEMod

According to the CalEEMod detailed report provided in Appendix B – Air Quality, Energy, and GHG Report, the land use type selected for the unrefrigerated portion of the warehouses is A1.2

[1] Draft EIR. p. 3-1.
[2] *Ibid.* p. 3-25.
[3] *Ibid.* p. 3-25 and 3-27.
[4] *Ibid.* p. 3-45.
[5] *Ibid.* p. 3-1.
[6] *Ibid.*

-1-

categorized as General Heavy Industry.[7] However, based on the CalEEMod User Guide, the General Heavy Industry land use type is defined as: "Heavy industrial facilities usually have a high number of employees per industrial plant and are generally limited to the manufacturing of large items."[8]

This classification does not accurately reflect the Proposed Project, which involves the development of two warehouse buildings with 20% of cold storage. The appropriate land use category for this project in CalEEMod should therefore be Unrefrigerated Warehouse and Refrigerated Warehouse, which more accurately represent the expected operational characteristics and associated emission factors. A1.2 cont.

Use of the incorrect land use category may lead to underestimation of construction and operational emissions in the environmental impact analysis. To ensure a more accurate assessment of air quality impacts, the Lead Agency is recommended to revise the CalEEMod inputs accordingly, rerun the model using the appropriate land use classification, and incorporate the updated results into the Final EIR.

Potentially Underestimated Construction Emissions

According to Section 5.9: Hazards and Hazardous Materials of the Draft EIR, its Phase I Environmental Site Assessment found that the Proposed Project site contains volatile organic compounds (VOCs) at concentrations that exceed their applicable regulatory screening thresholds[9], specifically:

- At 2626 Kansas Avenue, elevated concentrations of trichloroethene (TCE) have been identified in shallow soil vapor in the northwest portion of the site; tetrachloroethene (PCE) and TCE have been detected in the south-central and southeastern exterior areas; and 1,1-dichloroethene (1,1-DCE) has been detected in groundwater monitoring wells on the northwest portion of the site.
- At 2069 and 1989 Massachusetts Avenue, PCE and TCE have also been detected.

The Lead Agency has proposed Mitigation Measure HAZ-1, which requires preparation of a Soil Management Plan (SMP) and a Health and Safety Plan (HSP), both of which must be reviewed and approved by the Santa Ana Regional Water Quality Control Board prior to issuance of any grading or excavation permits.[10] However, the Draft EIR does not evaluate the potential air quality impacts associated with site cleanup and remediation activities during construction. A1.3

Cleanup activities will likely involve the use of heavy-duty, diesel-fueled trucks for soil export and result in emissions from truck hauling activities and vehicle trips by workers that will be required to conduct cleanup activities. Additionally, cleanup activities will likely require the use of additional equipment that may be different from typical equipment for grading and site preparation for construction. Based on the emission calculations from the California Emissions Estimator Model (CalEEMod) detailed report, the Lead Agency used the default one-way truck trip length of 20 miles to quantify the Proposed Project's construction emissions from hauling

[7] Appendix B – Air Quality, Energy, and GHG Report. CalEEMod Detailed Report.
[8] CalEEMod User Guide. P. 23.
[9] *Ibid.* p. 5.9-18.
[10] *Ibid.* p. 5.9-26.

construction materials and importing soil. According to Section 5.19: Utilities and Service Systems of the Draft EIR, it is identified that Badlands Landfill, Lamb Canyon Landfill, the El Sobrante Landfill, and Mid-Valley Sanitary Landfill are the municipal waste landfills that could serve the Proposed Project.[11] If cleanup activities include the removal and disposal of contaminated soil, depending on the type of contamination, these landfills may not accept the contaminated soil. In that case, contaminated soil may need to be transported to a permitted hazardous waste disposal facility located outside Riverside County, which could require a one-way trip significantly longer than 20 miles.

A1.3 cont.

To ensure an accurate quantification of construction-related emissions, including the cleanup activities, particularly for regional criteria pollutants and greenhouse gases, the Lead Agency is recommended to revise the CalEEMod[12] model inputs to reflect the actual distance to a known and permitted hazardous waste disposal facility expected to be used by the project. The selected trip length should be clearly disclosed and justified in the Final EIR. Should the Lead Agency elect not to revise the default 20-mile haul distance, a detailed rationale supported by substantial evidence in the administrative record must be provided to demonstrate the appropriateness of the default assumption in the context of the project-specific conditions.

Unsupported Truck Trip Distance Assumption Used in Emissions Modeling

Accurately estimating truck trip lengths is a key parameter when quantifying emissions from mobile sources, especially diesel particulate matter (DPM), oxides of nitrogen (NOx), and greenhouse gas (GHG). The mischaracterization of average trip length, for example, can lead to a significant underestimation of the project's air quality impacts. According to the Draft EIR, the truck emissions are calculated with the truck trip length as the weighted average of 15.3 miles for 2-axle, 14.2 miles for 3-axle, and 40 miles for 4-axle trucks.[13] However, the analysis lacks critical information regarding the supporting basis for determining the trip origins and destinations and whether the assumed distances are reflective of actual or anticipated routing patterns of the facility's current or future truck fleet.

As such, the Final EIR should include a clear and defensible rationale for the use of the truck trip length assumption. The rationale should be supported by documentation such as empirical data from fleet operations, transportation logistics studies, regional freight movement data, or other sources that demonstrate the applicability and appropriateness of the selected distances. Additionally, if any truck trips associated with the Proposed Project will include port-related activities, the Final EIR should explain this detail, and the modeled trip lengths should accurately reflect the mileage between the project site and the relevant port(s), such as the Ports of Los Angeles or Long Beach, located approximately 65-70 miles one-way from the Proposed Project site. A1.4

Therefore, it is recommended that the Lead Agency either revise the trip distance assumptions to more accurately reflect realistic operational conditions or provide additional evidence substantiating that the selected distances are representative of actual or reasonably foreseeable truck travel patterns associated with the Proposed Project. Failure to provide supporting evidence

[11] *Ibid.* p. 5.19-16.
[12] CalEEMod free of charge available at https://www.caleemod.com/
[13] *Ibid.* p. 5.3-22.

to validate these assumptions may compromise the accuracy of the emission estimates, conclusion, and the overall integrity of the air quality analysis presented in the Final EIR. A1.4 cont.

Truck Idling Duration and Emissions Modeling

Appendix C – Health Risk Assessment indicates that a default assumption of 15 minutes of idling per truck per day, including Transport Refrigeration Unit (TRU) trucks, was used to estimate DPM emissions for the operational health risk assessment.[14] While this assumption may be consistent with regulatory idling limits, it may not accurately reflect actual operating conditions for a facility of the Proposed Project's scale. The Proposed Project is anticipated to generate approximately 342 truck trips per day, with 20% of all heavy-duty diesel trucks assumed to be equipped with a TRU,[15] representing a substantial volume of heavy-duty vehicle activity. For a high-throughput logistics or distribution facility, it is reasonable to expect that individual trucks may experience extended periods of idling due to on-site queuing, security checks, staging, loading, and unloading operations, particularly during peak hours or in constrained circulation areas. As such, a 15-minute idling duration may underestimate actual on-site idling behavior and, consequently, DPM emissions, which are a key contributor to localized health risks.

Although the California Air Resources Board (CARB) limits diesel truck idling to five minutes as set forth in the Airborne Toxic Control Measure (ATCM), this regulation provides exemptions for trucks equipped with engines that meet the optional low-NOx idle emission standard, typically applicable to model year 2008 and newer trucks. These vehicles, often referred to as "clean idle" certified, are permitted to idle longer than five minutes when situated more than 100 feet from sensitive land uses such as homes and schools.[16] Furthermore, CARB's EMFAC2021 Volume III Technical Document (Table 4.4.2-5) indicates that heavy-duty trucks may idle for up to five hours at a single location under certain conditions.[17] A1.5

Accurate characterization of idling activity is essential to fully assess a project's potential health risk impacts, particularly for nearby sensitive receptors. Therefore, to ensure the HRA provides a conservative and health-protective estimate of potential exposure, the Lead Agency is recommended to either: 1) revise the operational emissions modeling in the Final EIR to assume a minimum of 30 minutes of idling per truck per day, unless site-specific data or operational constraints justify a shorter duration; or 2) provide empirical evidence, such as facility-specific queuing and processing time studies, vehicle circulation modeling, or comparable industry data, to substantiate the 15-minute assumption as representative of expected operations of the Proposed Project.

Inconsistency in Cancer Risk Results Presented in Draft EIR and Its Appendices

The health risk assessment for the Proposed Project includes evaluation of both short-term and long-term DPM emissions associated with construction and operational activities. The estimated cancer risk results are presented in the Draft EIR and its technical appendices. However, upon staff A1.6

[14] Appendix C – Health Risk Assessment. p. 23.
[15] Appendix C – Health Risk Assessment. p. 22.
[16] CARB. Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling available at https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling
[17] CARB. EMFAC2021 Volume III Technical Document. Page 161. Table 4.4.2-5 available at EMFAC2021 Volume III Technical Document

review, inconsistencies were identified between the Draft EIR, Appendix C - Health Risk Assessment, and Appendix B - Air Quality, Energy, and Greenhouse Gas Report. Specifically, the Draft EIR and Appendix C both show cancer risks of 0.63 in one million for construction and 5.59 in one million for operation.[18,19] In contrast, Appendix B shows 0.54 in one million for construction and 3.55 in one million for operation.[20]

A1.6 cont.

To ensure transparency, accuracy, and consistency across all CEQA documents, the Lead Agency is recommended to reconcile these discrepancies and include the updates in the Final EIR to reflect the correct and consistent cancer risk values throughout the CEQA document and all supporting appendices.

Additional Recommended Air Quality and Greenhouse Gas Mitigation Measures and Project Design Features for Consideration

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Final EIR. A1.7

Mitigation Measures to Reduce Operational Air Quality Impacts from Mobile Sources

1. Require zero-emission (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. A1.8

   Note: Given CARB'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 Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available for use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

   Note: South Coast AQMD staff are available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency. A1.9

3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level. A1.10

[18] *Ibid.* p. 5.3-28.
[19] Appendix C – Health Risk Assessment. p. 31 and 32.
[20] Appendix B – Air Quality, Energy, and GHG Report. p. 27.

4. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment. A1.11

Mitigation Measures to Reduce Operational Air Quality Impacts from Other Area Sources A1.12

1. Maximize the use of solar energy by installing solar energy arrays.
2. Use light-colored paving and roofing materials. A1.13
3. Utilize only Energy Star heating, cooling, and lighting devices and appliances. A1.14

Design Considerations for Reducing Air Quality and Health Risk Impacts

1. 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.). A1.15
2. 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. A1.16
3. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside. A1.17
4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors. A1.18
5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site. A1.19

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporate additional mitigation measures as applicable to the Proposed Project in the Final EIR: A1.20

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act[21]
2. South Coast AQMD 2022 Air Quality Management Plan,[22] specifically:

   a) Appendix IV-A – South Coast AQMD's Stationary and Mobile Source Control Measures

   b) Appendix IV-B – CARB's Strategy for South Coast

[21] State of California – Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act available at https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf
[22] South Coast AQMD, 2022 Air Quality Management Plan (AQMP) available at http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan

c) Appendix IV-C – SCAG's Regional Transportation Strategy and Control Measure

3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation.[23] A1.20 cont.

Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program

Since the Proposed Project consists of developing a total of 199,850 sf warehouses, once the warehouses are occupied, the Proposed Project's warehouse owners and operators will be required to comply with South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – WAIRE Program[24] and Rule 316 – Fees for Rule 2305.[25] Rule 2305 and Rule 316 aim to reduce regional and local emissions of NOx and particulate matter (PM), including DPM, so as to reduce adverse public health impacts on communities located near warehouses. 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 to earn WAIRE 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. Therefore, the Lead Agency is recommended to review Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements, design features/enhancements, and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation. For questions concerning Rule 2305 implementation and compliance, please call (909) 396-3140 or email waire-program@aqmd.gov. For implementation of guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage. A1.21

South Coast AQMD Air Permits and Role as a Responsible Agency

According to the Draft EIR, the Proposed Project would utilize two diesel fire pumps and two emergency generators,[26] for which air permits from the South Coast AQMD will be required. The Final EIR should include a discussion about the South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,[27] A1.22

[23] United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation available at https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation
[24] South Coast AQMD. Rule 2305 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf
[25] South Coast AQMD. Rule 316 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-iii/r316.pdf
[26] Ibid. p. 5.3-22.
[27] South Coast AQMD. Rule 201 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf

Candice Assadzadeh, Senior Planner August 07, 2025

Rule 203 – Permit to Operate,[28] Rule 401 – Visible Emissions,[29] Rule 402 – Nuisance,[30] Rule 403 – Fugitive Dust,[31] Rule 461 – Gasoline Transfer and Dispensing,[32] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[33] Rule 1113 – Architectural Coatings,[34] Rule 1166 – Volatile Organic Compound Emissions From Decontamination of Soil,[35] Regulation XIII – New Source Review,[36] Rule 1401 – New Source Review of Toxic Air Contaminants,[37] Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[38] etc. A1.22 cont.

In addition, it is important to note that since air permits from South Coast AQMD are required, South Coast AQMD's role under CEQA is as a Responsible Agency. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Also, as set forth in CEQA Guidelines Section 15096(h), the Responsible Agency is required to make Findings in accordance with CEQA Guidelines Section 15091 for each significant effect of the project and issue a Statement of Overriding Considerations in accordance with CEQA Guidelines Section 15093, if necessary. Lastly, as set forth CEQA Guidelines Section 15096(i), the Responsible Agency may file a Notice of Determination.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. A1.23

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types

[28] South Coast AQMD. Rule 203 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[29] South Coast AQMD. Rule 401 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[30] South Coast AQMD. Rule 402 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[31] South Coast AQMD. Rule 403 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[32] South Coast AQMD. Rule 461 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-461.pdf
[33] South Coast AQMD. Rule 1110.2 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[34] South Coast AQMD. Rule 1113 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[35] South Coast AQMD. Rule 1166 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf
[36] South Coast AQMD. Regulation XIII available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[37] South Coast AQMD. Rule 1401 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[38] South Coast AQMD. Rule 1470 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

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of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at https://www.aqmd.gov/home/permits. A1.23 cont.

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. A1.24

Thank you for the opportunity to provide comments. South Coast AQMD staff are available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW:DN
RVC250625-03
Control Number

3.1 Response to Comment Letter A1: South Coast Air Quality Management District, Dated August 7, 2025

Comment A1.1: This comment provides an introduction to the comment letter and states that the South Coast Air Quality Management District (SCAQMD) is appreciative of their opportunity to comment.

Response A1.1: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the EIR, no further response is required or provided.

Comment A1.2: This comment states that the Draft EIR used the "General Heavy Industry" land use type in CalEEMod for the unrefrigerated warehouse portion of the Project. The comment states that this category represents large-scale manufacturing facilities and does not reflect the Project's characteristics. The comment states that the appropriate land use types are "Unrefrigerated Warehouse" and "Refrigerated Warehouse," consistent with the Project's inclusion of 20 percent cold storage. The comment states that use of the incorrect land use type may underestimate emissions and recommends revising the CalEEMod inputs, rerunning the model, and updating the Final EIR.

Response A1.2: The proposed Project is currently planned as a speculative industrial development, meaning no specific tenant or end user has been identified at this time. For the Air Quality, Energy, and Greenhouse Gas Analysis (Appendix B), the California Emissions Model (CalEEMod) Land Use Subtype inputs used correspond to the Institute of Transportation Engineers (ITE) Trip Generation Hand Book (11th Edition) trip rate for the Land Use Codes used in the Project's Traffic Analysis (Appendix K), in addition to the Project's characteristics. This approach ensures consistency between the modeling assumptions of the traffic trips generated and the emission generated from those trips.

Additionally, the CalEEMod (Version 2022.1) User Guide identifies which ITE Land Use Codes correspond to the CalEEMod Land Use Subtypes. The CalEEMod Land Use Subtype "Unrefrigerated Warehouse-No Rail" corresponds with ITE Land Use Code 150 – Warehouse. However, to provide a conservative analysis, the Project's Traffic Analysis utilized the ITE trip rate for Land Use Code 110 – General Light Industrial (GLI), which is 4.87 trips per 1,000 square feet (tsf), as it is higher than the trip rate for Land Use Code 150 Warehouse (1.71 trips/tsf). As a result, applying the GLI land use rate generates more trips (and higher mobile-source emissions) than would reasonably be expected for the Project's proposed warehouse use.

Accordingly, the CalEEMod Land Use Subtype that correspondence with ITE Land Use Code 110 – GLI used in the Traffic Analysis would be "General Light Industry." However, per the CalEEMod User Guide, for a project with a lot size greater than 50,000 square feet, the user must select a different land use type such as general heavy industry, industrial park, or manufacturing.[1] As such, the Air Quality, Energy, and Greenhouse Gas Analysis utilized the CalEEMod Land Use Subtype of "General Heavy Industry," as opposed to "Unrefrigerated Warehouse-No Rail," in addition to "Refrigerated Warehouse-No Rail," in accordance with the CalEEMod User Guide to ensure a conservative analysis and maintain consistency with the corresponding ITE trip rate used in the Project's Traffic Analysis.

Therefore, the CalEEMod Land Use Subtype of "General Heavy Industry" is appropriate for the Project, and no changes to the land use types executed in the modeling of the Project are warranted. Therefore, no changes to the EIR are warranted.

Comment A1.3: This comment states that the Draft EIR does not evaluate potential air quality impacts associated with site cleanup and remediation activities during construction, despite the presence of VOCs

[1] California Air Pollution Control Officers Association (CAPCOA). (2022, April). *CalEEMod User Guide (Version 2022.1)*. ICF & partners. https://www.caleemod.com/documents/user-guide/CalEEMod_User_Guide_v2022.1.pdf

identified in the Phase I Environmental Site Assessment. The comment states that cleanup activities would likely require additional equipment and truck hauling beyond typical construction activities, potentially resulting in underestimated construction emissions. The comment states that use of the default 20-mile haul distance in CalEEMod may not reflect the longer trip lengths required if contaminated soil must be transported to a permitted hazardous waste disposal facility outside Riverside County. The comment recommends revising the CalEEMod inputs to reflect the actual disposal distance or providing substantial evidence to justify the use of the 20-mile assumption in the Final EIR.

Response A1.3: This comment has been addressed through revisions to the CalEEMod construction trip length assumptions. Specifically, the proposed Project will result in export of approximately 500 cubic yards (CY) of contaminated soil. As such, the CalEEMod default 20-mile hauling distance has been updated to 56-mile hauling distance during the site preparation phase to account for the distance to the Soil Safe Landfill in Adelanto, identified by the Riverside County Department of Waste Resources as the appropriate disposal facility for potentially contaminated soil.

These revisions ensure that construction-related emissions associated with site cleanup and remediation activities are analyzed in the EIR analysis and technical studies. The Project's Health Risk Assessment (HRA) (Appendix C) has been updated to reflect the correct site preparation volumes and trip lengths. The updated HRA analysis resulted in a nominal increase of particulate matter 10 exhaust (PM10E). As no significant changes were found in the updated analysis, the update did not result in a change from the previously disclosed health risk results nor a change in the HRA conclusion.

The Projects' Air Quality, Energy, and Greenhouse Gas (GHG) Report (Appendix B) has also been updated to reflect the correct site preparation volumes and trip lengths. As shown in the updated Appendix B, the conclusions from the original Air Quality, Energy, and GHG Report remain less than significant. Therefore, recirculation of the Draft EIR is not warranted.

Draft EIR Sections 5.3, *Air Quality*, 5.6, *Energy*, and 5.8 *Greenhouse Gas Emissions*, have been revised to reflect the updated Appendix C and Appendix B in Section 2.0, *Errata*, of this Final EIR and as shown below. This correction does not change the conclusions of the EIR, and the findings remain the same.

Page 5.3-24, Section 5.3.6, *Environmental Impacts*, is revised as follows:

5.3.6 Environmental Impacts

Table 5.3-2: Regional Project Construction Emissions

Construction Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
2026						
Demolition	2.7	44.9	25.6	0.2	24.1	5.4
Site Preparation	3.9	~~34.7~~ **35.9**	~~32.0~~ **32.2**	0.1	~~7.7~~ **8.0**	~~4.4~~ **4.5**
Grading	3.5	33.0	30.5	0.1	5.0	2.6
Building Construction	1.5	12.1	20.4	<0.1	1.8	0.7
Maximum Daily Emissions 2026	3.9	44.9	~~32.0~~ **32.2**	0.2	24.1	5.4
2027						
Building Construction	1.4	11.6	18.6	<0.1	1.8	0.7

Construction Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Paving	1.4	7.0	10.7	<0.1	0.5	0.3
Architectural Coating	54.7	1.2	2.3	<0.1	0.2	0.1
Maximum Daily Emissions 2027	54.7	11.6	18.6	<0.1	1.8	0.7
Maximum Daily Emission 2026-2027	**54.7**	**44.9**	**~~32.0~~ 32.2**	**0.2**	**24.1**	**5.4**
SCAQMD Significance Thresholds	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: ROGs = reactive organic gases, CO = carbon monoxide, SO_2 = sulfur dioxide, NOx = nitrogen oxides, PM_{10} = particulate matter (10 microns), $PM_{2.5}$ = particulate matter (2.5 microns)
Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

Page 5.3-25, Section 5.3.6, *Environmental Impacts*, is revised as follows:

5.3.6 Environmental Impacts

Table 5.3-3: Regional Project Operational Emissions

Operational Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Mobile	3.3	28.1	42.1	0.3	16.8	4.7
Area	6.2	0.1	8.7	<0.1	~~<0.1~~ **0.0**	~~<0.1~~ **0.0**
Energy	0.1	2.1	1.8	<0.1	0.2	0.2
Off-Road	<0.1	17.7	176.2	<0.1	<0.1	<0.1
Stationary	1.6	4.4	4.0	<0.1	0.2	0.2
Total Project Operational Emissions	**11.3**	**52.4**	**232.7**	**0.3**	**17.2**	**5.1**
Existing Use Operational Emissions	1.9	31.6	~~61.0~~ **65.3**	0.4	23.1	6.3
Net New Emissions	**9.3**	**20.8**	**~~171.8~~ 167.4**	**<0.1**	**-6.0**	**-1.3**
SCAQMD Significance Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: ROGs = reactive organic gases, CO = carbon monoxide, SO_2 = sulfur dioxide, NOx = nitrogen oxides, PM_{10} = particulate matter (10 microns), $PM_{2.5}$ = particulate matter (2.5 microns)
Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Table 5.3-4: Localized Project Construction Emissions

Construction Activity	Maximum Daily Localized Emissions (pounds/day)			
	NOx	CO	PM_{10}	$PM_{2.5}$
2026				
Demolition	20.7	19.0	17.9	3.4

Construction Activity	Maximum Daily Localized Emissions (pounds/day)			
	NOx	CO	PM_{10}	$PM_{2.5}$
Site Preparation	34.6	31.0	7.4	4.3
Grading	30.0	28.7	4.1	2.3
Building Construction	10.7	28.1	0.8	0.8
Maximum Daily Emissions 2026	34.6	31.0	17.9	4.3
2027				
Building Construction	10.2	14.0	0.4	0.3
Paving	6.9	10.0	0.3	0.3
Architectural Coating	1.1	1.5	<0.1	<0.1
Maximum Daily Emissions 2027	10.2	14.0	0.4	0.3
Maximum Daily Emission 2026-2027	**34.6**	**31.0**	**17.9**	**4.3**
SCAQMD Localized Significance Thresholds	~~45.17~~ **268**	~~6,285.3~~ **1,827.7**	~~89~~ **33.3**	~~28.3~~ **8.7**
Threshold Exceeded?	**No**	**No**	**No**	**No**

Notes: NOx = nitrogen oxides, CO = carbon monoxide, PM_{10} = particulate matter (10 microns), $PM_{2.5}$ = particulate matter (2.5 microns).
Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

Page 5.6-6, Section 5.6.6, *Environmental Impacts*, is revised as follows:

5.6.6 Environmental Impacts

The energy analysis modeling for the proposed Project (included as Appendix B) shows that construction-related use of construction vehicles and off-road equipment would utilize approximately ~~59,818~~ 75,047 gallons of diesel fuel and ~~15,304~~ 22,470 gallons of gasoline, as detailed in Table 5.6-1 below.

Table 5.6-5: Construction Fuel Consumption

Construction Source	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
Construction Vehicles	~~21,839~~ **37,068**	~~15,304~~ **22,470**
Off-Road Construction Equipment	37,979	0
Total	~~**59,818**~~ **75,047**	~~**15,304**~~ **22,470**

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Page 5.8-11, Section 5.8.6, *Environmental Impacts*, is revised as follows:

5.8.6 Environmental Impacts

Construction

Implementation of the proposed Project would generate GHG emissions from demolition, construction activities, haul trips, vendor trips, and construction worker vehicle trips. For construction emissions, the SCAQMD recommends amortizing emissions over 30 years by calculating the total GHG emissions for the construction activities, dividing it by a 30-year project life, then adding that number to the annual operational phase GHG emissions, which is done within this analysis. Table 5.8-1 provides the estimated construction

emissions from the Project. As shown, the Project would emit a total of ~~844~~ **850** Annual MTCO2e over the duration of construction, with 2026 having the highest emission level (~~821~~ **826** MTCO2e). Amortized over 30 years, the Project's construction emissions would be approximately 28 MTCO2e per year.

Table 5.8-6: Project Construction Greenhouse Emissions

Activity	Annual GHG Emissions ($MTCO_2e$)
2026	~~821~~ **826**
2027	23
Total Emissions	~~**844**~~ **850**
Total Emissions Amortized Over 30 Years	**28**

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

Page 5.8-11 to 5.8-12, Section 5.8.6, *Environmental Impacts*, is revised as follows:

5.8.6 Environmental Impacts

Operation

The proposed Project would construct two warehouse buildings with a combined total building square footage of 199,850 square feet (SF) that would accommodate approximately 194 employees. Operation of the proposed Project would generate GHG emissions from vehicle trips, electricity and natural gas consumption, water and wastewater transport (the energy used to pump water), and solid waste generation. GHG emissions from electricity consumed by the proposed Project would be generated off site by fuel combustion at the electricity provider. GHG emissions from water transport are also indirect emissions resulting from the energy required to transport water from its source. GHG emissions from solid waste disposal are associated with the anaerobic breakdown of material.

The Air Quality, Energy, and GHG Impact Analysis prepared for the proposed Project (Appendix B) describes that the GHG emissions generated from the proposed Project at buildout are primarily associated with non-construction related mobile sources, such as vehicle and truck trips. The annual GHG emissions associated with the proposed Project are summarized in Table 5.8-2. As shown, operation of the Project, including amortized construction emissions, would generate a net total of approximately ~~7,272~~ **7,269** MTCO2e per year, which would not exceed the screening threshold of 10,000 MTCO2e per year. The existing operational GHG emissions from the existing buildings were estimated to be 1,785 MTCO2e. As such, the net new emissions (proposed Project minus existing) from the proposed Project are ~~5,457~~ **5,484** MTCO2e per year. The proposed Project's net and total GHG emission results are both below the SCAQMD significance threshold of 10,000 MTCO2e per year. Therefore, impacts would be **less than significant**.

Table 5.8-7: Project Greenhouse Gas Emissions

Activity	Annual GHG Emissions ($MTCO_2e$)
Project Operational Emissions	
Mobile	5,426
Area	4
Energy	921
Water	127
Waste	74
Refrigeration	183

Activity	Annual GHG Emissions ($MTCO_2e$)
Off-Road	461
Stationary	~~18~~ 45
Total Project Gross Operational Emissions	**7,214**
Amortized Construction Emissions	**28**
Total Project Emissions	~~7,242~~ 7,269
Existing Emissions	1,785
Net New Emissions (Gross - Existing)	~~5,457~~ 5,484
Significance Threshold	10,000
Threshold Exceeded?	**No**

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

Comment A1.4: This comment states that the Draft EIR relies on average truck trip lengths of 15.3 miles for 2-axle, 14.2 miles for 3-axle, and 40 miles for 4-axle trucks, but states that the Draft EIR does not provide supporting evidence for these assumptions. The comment states that inaccurate trip length assumptions can result in underestimated emissions of Diesel Particulate Matter (DPM), NOx, and GHGs. The comment recommends that the Final EIR include documentation to support the trip length assumptions, such as fleet data or regional freight studies, or revise the assumptions to reflect realistic operational conditions. The comment further states that if the Project includes port-related truck trips, the analysis should account for distances of approximately 65–70 miles to the Ports of Los Angeles or Long Beach.

Response A1.4: As discussed in Section 3.0, *Project Description*, of the Draft EIR, no tenants have been identified for the proposed warehouses. Therefore, the specific type of businesses that would occupy the proposed general light industrial and refrigerated warehouse uses and their associated fleet operations are unknown.

The types of warehousing that could occur within the Project range from high-cube warehouses to light manufacturing, and goods could enter the region through multiple gateways, including the Ports of Los Angeles and Long Beach or by air through Ontario International Airport or March Inland Port. Due to the uncertainty in actual trip distances, applying SCAQMD's recommended trip length provides an acceptable and regionally representative basis for analysis.

As acknowledged by the commenter, the trip distance of 39.9 miles per truck trip utilized for the Project is from SCAQMD Rule 2305 WAIRE Implementation Guidelines, which is the SCAQMD's indirect source review program used to help control and minimize air quality impacts from mobile source emissions associated with trucks from warehouses. The 39.9-mile trip length is based on SCAQMD's own studies that concluded that the average heavy duty truck trip length in the entire South Coast Air Basin was 39.9 miles. Therefore, 39.9 miles represent reasonably foreseeable average truck travel patterns associated with projects within the South Coast Air Basin, and thus are applicable and reasonably estimate the truck trip length for heavy-duty vehicles for the proposed Project.

Therefore, the Project's truck trip length assumptions more accurately reflect the anticipated average trip lengths than the commenter's suggested 65–70 miles, which is not based on SCAQMD's methodology. As such, no updates to the Draft EIR are warranted.

Comment A1.5: This comment states that the Health Risk Assessment assumes 15 minutes of truck idling per day, including for trucks, but that this may underestimate actual idling behavior at a high-throughput logistics facility. The comment states that trucks may experience extended idling during queuing, security checks, staging, loading, and unloading, leading to higher DPM emissions than modeled. The comment notes that CARB regulations allow exemptions for "clean idle" trucks and that heavy-duty trucks can idle for significantly longer periods under certain conditions. The comment recommends that the Final EIR either revise the emissions modeling to assume at least 30 minutes of idling per truck per day or provide empirical evidence to substantiate that the 15-minute assumption is representative of expected operations.

Response A1.5: This comment does not provide substantial evidence that the 15-minute idling assumption used in the Health Risk Assessment results in a substantial underestimation of DPM emissions or health risk impacts within the Draft EIR. As acknowledged by the commenter, statewide idling restrictions established by CARB's Airborne Toxic Control Measure limit diesel truck idling to five minutes, with exemptions for certain "clean idle" engines. The HRA appropriately applied a conservative 15-minute per truck per day idling assumption, which complies with the applicable regulatory standard and reflects a conservative approach to estimating potential emissions from truck operations.

In addition, truck idling on the Project site would be managed through site design and operational management, including designated on-site loading areas, to ensure compliance with the City's zoning code and CARB idling restrictions minimizing potentially extended idling times. Although the City Planning Division and Engineering Department have evaluated the proposed queue length and further analysis would be prepared prior to building permit issuance, the Project Applicant is voluntarily incorporating a check-in point inside the Project Site, included as PDF AQ-4, to further reduce idling on surrounding roadways. Ultimately, all trucks accessing the Project site would be required to comply with the City's and CARB's 5-minute idling limit pursuant to Riverside Municipal Code Section 19.435.030. For these reasons, the assumption used in the HRA remains conservative and consistent with regulatory requirements, and no revisions are warranted.

Comment A1.6: This comment states that the cancer risk results presented in the Draft EIR are inconsistent with those reported in its technical appendices. The comment states that while the Draft EIR and Appendix C show risks of 0.63 in one million for construction and 5.59 in one million for operation, Appendix B reports 0.54 in one million for construction and 3.55 in one million for operation. The comment recommends reconciliation of these discrepancies in order to ensure the Final EIR and all appendices present consistent cancer risk values.

Response A1.6: This comment has been addressed through revisions to Appendix B to ensure consistency across the EIR and all applicable technical studies. The Final EIR now reflects uniform cancer risk values of 0.63 in one million for construction and 5.59 in one million for operation throughout the Draft EIR, HRA (Appendix C), and the Air Quality, Energy and GHG Report (Appendix B). These revisions reconcile the discrepancies noted by the commenter and ensure that the health risk assessment results are presented accurately and consistently across the document and supporting appendices. Appendix B has been revised to be consistent with the cancer risk values listed in the Draft EIR and Appendix C. This correction does not change the conclusions of the EIR, and the findings remain the same.

Comment A1.7: This comment states CEQA requires that all feasible mitigation measures be utilized to reduce or minimize any significant air quality impacts and that the SCAQMD recommends certain mitigation measures and project design features be incorporated into the Final EIR.

Response A1.7: While CEQA requires that all feasible mitigation measures be utilized to minimize or eliminate any significant adverse impacts, as discussed in Section 5.3, *Air Quality*, of the Draft EIR, the Project would result in less than significant air quality impacts. As such, mitigation measures to mitigate air quality impacts are not required. However, the Project Applicant has agreed to incorporate some of the

recommendations as Project Design Features (PDFs), as discussed in responses to comments A1.5, A1.13, A1.14, A1.15, A1.16, A1.17, A1.19, A1.20.

Comment A1.8: This comment suggests that the Project require zero emission or near zero emission heavy duty trucks if and when feasible. The comment further states that CARB's clean truck rules and regulations will lead to zero emission and near zero emission trucks becoming more available for use.

Response A1.8: As discussed in Sections 5.3, 5.6, and 5.8 of the Draft EIR, the Project would not result in significant impacts to air quality, energy, or GHG. Therefore, CEQA does not require that the Project implements mitigation measures for air quality, energy, or GHG impacts. Additionally, as of 2025, the use of zero-emission heavy-duty trucks in support of uses such as those proposed by the Project remains infeasible given the extremely limited commercial availability of zero-emission trucks, as well as infrastructure limitations, including limited truck-accessible charging/refueling stations and electrical grid capacity.

While heavy-duty truck manufacturers have released zero-emission battery electric and hydrogen-powered trucks, these vehicles have yet to reach large scale production, and their use remains extremely limited. Further, the availability of truck accessible vehicle charging stations and hydrogen refueling stations in California and the United States as a whole severely limits the feasibility of zero-emission trucks.

Requiring the Project to utilize emerging technology as mandatory mitigation when the various types of technological advancements and their timeframes for commercial availability are not known with any certainty is not a feasible mitigation measure and compliance would be speculative. Lastly, the Project would not require zero emission or near zero emission heavy duty trucks as the Project's construction and operational air quality and GHG emissions and energy consumption would not result in significant impacts that trigger the need for mitigation measures. This comment does not warrant any changes to the Draft EIR.

Comment A1.9: This comment suggests that the Lead Agency require a phase in schedule for cleaner operating trucks to reduce any significant air quality impacts and that SCAQMD staff is available to discuss the availability of current and upcoming truck technologies.

Response A1.9: As stated in Response A1.8, implementation of this mitigation measure is unfeasible at this time as the types of technological advancements and the associated timeframes for commercial availability for zero emission and near zero emission trucks are not known with any certainty and are highly speculative. In addition, the Project does not require mitigation measures for Air Quality, Energy, or GHG because the Project's construction and operational air quality and GHG emissions and energy consumption would not result in significant impacts. This comment does not warrant any changes to the Draft EIR.

Comment A1.10: This comment suggests that the Lead Agency limit the daily number of trucks to levels analyzed in the Draft EIR and if a higher number of trucks are anticipated to visit the site, the Lead Agency shall commit to reevaluating the Project through CEQA.

Response A1.10: CEQA does not require mitigation measures for Air Quality and GHG for the Project because the Project would not result in significant Air Quality or GHG Impacts, as discussed in Sections 5.3 and 5.8 of the Draft EIR

In addition, there are no mechanisms in place beyond that required for SCAQMD Rule 2305 (which the proposed buildings would be exempt from) for documenting, tracking and monitoring the number of truck trips that access any site. CEQA requires that an EIR evaluate the Project based on reasonable assumptions and foreseeable actions. The trip generation estimates uses trip generation rates listed in the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition. The comment does not present any evidence that truck trips associated with the Project would be greater than disclosed in the Draft EIR. There is no substantial evidence presented by this comment or by any of the information in the Project's administrative record that contradicts the reasonable assumptions made in the Draft EIR about the expected

number of truck trips. Introducing a cap on the number of trucks that can access the proposed buildings is not required under CEQA, nor would it be reasonable or feasible for the City to monitor and enforce such a requirement. Therefore, implementation of this measure is not feasible and the measure itself is not enforceable. This comment does not warrant any changes to the Draft EIR.

Comment A1.11: This comment suggests that the Lead Agency require the provision of electric vehicle charging stations or provide electrical infrastructure and appropriately sized electric panels. The comment suggests also requiring electrical hookups for truckers to plug in any onboard auxiliary equipment.

Response A1.11: As discussed on page 5.3-6 of the Draft EIR, the Project is required to comply with the 2022 CALGreen Code, adopted by the City of Riverside Municipal Code in Chapter 16.07: Green Code, which requires the installation of electric truck charging infrastructure within truck parking areas to support future installation of charging stations when electric heavy-duty trucks are available. Regarding electric hookups for truckers to plug in onboard auxiliary equipment, Title 24 requires the installation of conduit at truck loading docks and correct electrical room sizing to ensure that tenants are able to provide plug ins at loading docks. Therefore, no additional mitigation measures are warranted.

Comment A1.12: This comment suggests that the Project include mitigation maximizing the use of solar energy by installing solar arrays.

Response A1.12: As discussed in Section 5.6, *Energy*, of the Draft EIR, the Project would be designed to be solar-ready, and the Project would be designed and built in such a manner as to facilitate the installation of solar photovoltaics in the future at the time a tenant occupies each building in accordance with Title 24. It should be noted that as of 2022, approximately one third of the power generated by Southern California Edison is from renewable sources, and this is anticipated to continue to increase under the State's Renewable Portfolio Standard, which requires retail sellers of electric services to increase procurement from eligible renewable resources to 44 percent of total retail sales by 2024. The amount of retail electricity provided from renewable sources is expected to further increase significantly in order to meet the state goal of carbon neutrality by 2045. Additionally, as discussed in Section 5.6 of the Draft EIR, the Project would not have unusual Project characteristics that would cause the use of construction equipment to be less energy efficient compared with other similar construction sites in other parts of the state, and would result in a less-than-significant impact related to energy usage and no mitigation would be required. Therefore, implementation of this measure at this time is not feasible and the measure itself is not required.

Comment A1.13: This comment suggests that the Project include mitigation requiring use of light-colored paving and roofing materials.

Response A1.13: The analysis determined that the Project would not result in significant impacts that would necessitate additional mitigation measures such as those suggested by the commenter. Nevertheless, the Project Applicant is voluntarily incorporating light-colored paving and roofing materials as Project Design Feature (PDF) AQ-1 to further reduce potential operational air quality impacts in response to this comment. Draft EIR Section 5.3, *Air Quality*, has been revised to reflect this update in Section 2.0, *Errata*, of this Final EIR and shown below. This correction does not change the conclusion of the EIR, and the findings remain the same.

Page 5.3-32, Section 5.3.9, Project Design Features, is revised as follows:

5.3.9 Project Design Features

~~None.~~

PDF AQ-1: The Project would use light-colored paving and roofing materials. This design feature would reduce heat absorption, thereby lowering cooling demands and associated energy use, which in turn

would reduce operational air quality impacts. No quantitative credit was taken in the air quality analysis for this design feature.

Comment A1.14: This comment suggests that the Project includes mitigation requiring use of only Energy Star heating, cooling, and lighting devices.

Response A1.14: As discussed in Section 5.6 of the Draft EIR, the Draft EIR includes an analysis of the Project's energy demand and demonstrates that energy consumption would not result in a significant impact under CEQA. Furthermore, the Project will be required to comply with the most recent Title 24 Building Energy Efficiency Standards and CALGreen Code, which establish rigorous energy efficiency requirements for building systems, cooling, and lighting. As the Project's energy impacts are less than significant and subject to compliance with mandatory state energy codes, the suggested mitigation measures would not be required. In addition, as discussed in Section 5.3, *Air Quality*, of the Draft EIR, the Project would result in less than significant air quality impacts. As such, mitigation measures to mitigate air quality impacts are not required. Nevertheless, the Project Applicant is voluntarily incorporating the use of Energy Star heating, cooling, lighting and appliances as PDF AQ-2 to further reduce potential operational air quality impacts in response to this comment. Draft EIR Section 5.3, *Air Quality*, has been revised to reflect this update in Section 2.0, *Errata*, of this Final EIR and shown below. This correction does not change the conclusion of the EIR, and the findings remain the same.

Page 5.3-32, Section 5.3.9, Project Design Features, is revised as follows:

5.3.9 Project Design Features

~~None.~~

PDF AQ-2: The Project would use Energy Star heating, cooling, and lighting devices and appliances. This design feature would increase energy efficiency and reduce electricity demand, which in turn would reduce operational air quality impacts. No quantitative credit was taken in the air quality analysis for this design feature.

Comment A1.15: This comment suggests that the Project clearly marks truck routes with signs so that trucks do not travel next to or near sensitive land uses.

Response A1.15: Project Design Feature (PDF AQ-3) which states that the Project would be designed to include the installation of signs at every truck exit providing directional information to the trucks' routes, has been added to the Project and included in the updated Air Quality, Energy, and GHG Analysis (Appendix B). This PDF is meant to prevent nearby sensitive receptors from further exposure to criteria pollutants during the operation of the Project. No quantitative credit was taken in the air quality analysis for this design feature. Draft EIR Section 5.3, *Air Quality*, has been revised to reflect this update in Section 2.0, *Errata*, of this Final EIR and as shown below. This correction does not change the conclusions of the EIR, and the findings remain the same.

Page 5.3-32, Section 5.3.9, *Project Design Features*, is revised as follows:

5.3.9 Project Design Features

~~None.~~

PDF AQ-3: The Project would be designed to include the installation of signs at every truck exit providing directional information to the trucks' routes. This design feature would prevent nearby sensitive receptors from further exposure to criteria pollutants during the operation of the Project. No quantitative credit was taken in the air quality analysis for this design feature.

Comment A1.16: This comment recommends that the Project is designed such that truck entrances and exits are not facing sensitive receptors in order to avoid trucks traveling past sensitive land uses to enter or leave the Project.

Response A1.16: Trucks would access the site regionally via SR-91 to Spruce Street and I-215 to 3rd Street, and are expected to primarily utilize Kansas Avenue, Massachusetts Avenue, and 3rd Street to access the site, as discussed in Section 5.17 of the Draft EIR. The Project proposes five new driveways: Driveway 1 would located to the northeast of the Project site, along Roberta Street; Driveway 2 would be located on the northwest of the Project site, along Roberta Street; Driveway 3 would be located along Kansas Avenue (center); Driveway 4 would be located to the southwest of the Project site, along Kansas Avenue; Driveway 5 would be located along Massachusetts Avenue, near the southeast corner of the site (refer to Section 3.0 of the Draft EIR).

Of the five proposed driveways, Driveway 5 is closest to the nearest sensitive receptor, a housing assistance shelter located at 2801 Hulen Place east of the Project site, and to the nearest residential area located south of 3rd Street. Driveway 5 would provide both passenger vehicle and truck access, as discussed in Section 3.0 of the Draft EIR. This driveway would be located approximately 67.3 meters west of the housing assistance shelter on Hulen Place and approximately 505.7 meters north of the sensitive receptors on 3rd Street. Therefore, the Project is designed such that the driveways are not adjacent to the sensitive receptors located on Hulen Place or 3rd Street. Additionally, the Project site is currently an existing industrial facility, surrounded by other existing industrial uses, and would generate a nominal amount of new truck trips as compared to the existing condition. Furthermore, the Project Applicant is voluntarily including the following measures as Project Design Features (PDFs) to further reduce potential exposure of nearby sensitive receptors.

PDF AQ-3: The Project would be designed to include the installation of signs at every truck exit providing directional information to the trucks' routes. This design feature would prevent nearby sensitive receptors from further exposure to criteria pollutants during the operation of the Project. No quantitative credit was taken in the air quality analysis for this design feature.

PDF AQ-4: The Project would have a truck check-in point inside of the Project site, consistent with best practices for siting and designing warehouse facilities. This design feature would help manage truck circulation on-site and reduce idling on surrounding roadways, thereby minimizing operational exposure of nearby sensitive receptors to criteria pollutants. No quantitative credit was taken in the air quality analysis for this design feature.

PDF AQ-5: The Project would be designed to provide overnight truck parking inside of the Project site. This design feature would encourage trucks to not park overnight near sensitive receptors and prevent further exposure to criteria pollutants during the operation of the Project. No quantitative credit was taken in the air quality analysis for this design feature.

Comment A1.17: This comment recommends that the Project is designed so that truck check-in points are inside the Project to avoid queuing.

Response A1.17: As discussed on page 5.17-9 of the Draft EIR, onsite truck driveways have been evaluated by the City Planning Division and Engineering Department to ensure that the necessary queue length is provided to ensure trucks accessing the business park buildings do not back onto Chicago Avenue, Massachusetts Avenue, or 3rd Street. In addition, once tenants are known for the proposed buildings, a tenant-specific queueing analysis would be prepared and reviewed by City Engineering prior to issuance of a building permit.

In addition, as discussed in Section 5.3, *Air Quality*, of the Draft EIR, the Project would result in less than significant air quality impacts. As such, mitigation measures to mitigate air quality impacts are not required.

Nevertheless, although the City Planning Division and Engineering Department have evaluated the proposed queue length and further analysis would be prepared prior to building permit issuance, the Project Applicant is voluntarily incorporating a check-in point inside the Project Site as PDF AQ-4 to further reduce potential air quality impacts in response to this comment. Draft EIR Section 5.3, *Air Quality*, has been revised to reflect this update in Section 2.0, *Errata*, of this Final EIR and shown below. This correction does not change the conclusion of the Draft EIR, and the findings remain the same.

Page 5.3-32, Section 5.3.9, Project Design Features, is revised as follows:

5.3.9 Project Design Features

~~None.~~

PDF AQ-4: The Project would have a truck check-in point inside of the Project site, consistent with best practices for siting and designing warehouse facilities. This design feature would help manage truck circulation on-site and reduce idling on surrounding roadways, thereby minimizing operational exposure of nearby sensitive receptors to criteria pollutants. No quantitative credit was taken in the air quality analysis for this design feature.

Comment A1.18: This comment recommends that the Project be designed so that truck circulation is located as far away as feasible from sensitive receptors.

Response A1.18: As discussed in Response A1.16, the Project would be designed such that Project driveways are not adjacent to or directly facing sensitive receptors. The City of Riverside adopted Good Neighbor Guidelines (GNG-2020) in November 2020.

The goals of the City's GNG-2020 are to ensure that new industrial: (1) ensure air quality and health risks are evaluated, (2) evaluate and minimize noise impacts, and (3) protect residential uses and neighborhood character of the City. The City's GNGs are codified in the City's Municipal Code Title 19, Zoning. Air quality and health risk GNGS include the following: (1) Minimize exposure to diesel emissions for residential neighborhoods, schools, parks, playgrounds, day care centers, nursing homes, hospitals, and other public places (Sensitive Receptors) situated in close proximity to the industrial uses; (2) In compliance with CEQA, conduct SCAQMD URBEMIS and EMFAC computer models to identify the significance of air quality impacts on Sensitive Receptors; (3) Minimize the air quality impacts of trucks on Sensitive Receptors; (4) Promote the installation of on-site electric hook-ups to eliminate idling of main and auxiliary engines during loading and unloading of cargo and when trucks are not in use – especially where transport refrigeration units (TRUs) are proposed to be used.

The City's Planning division has reviewed the Project plans and determined that the proposed Project is in compliance with the City's Good Neighbor Policy. Additionally, the Project is located on site of an existing industrial facility, surrounded by other existing industrial uses, and would generate a nominal amount of new truck trips past existing sensitive/residential receptors. The Project would follow existing City truck routes and would be routed away from sensitive receptors. No changes to the design would be required and no further response is warranted.

Comment A1.19: This comment recommends that the Project restrict overnight truck parking in sensitive areas by providing overnight truck parking inside the Project site.

Response A1.19: PDF AQ-5 which states that the Project would be designed to provide overnight truck parking inside the Project Site, has been added to the Project. This PDF is meant to encourage trucks to not park overnight near sensitive receptors and prevent further exposure to criteria pollutants. No quantitative credit was taken in the air quality analysis for this design feature. Draft EIR Sections 5.3, *Air Quality*, has

been revised to reflect this update in Section 2.0, *Errata*, of this Final EIR and as shown below. This correction does not change the conclusions of the EIR, and the findings remain the same.

Page 5.3-32, Section 5.3.9, *Project Design Features*, is revised as follows:

5.3.9 Project Design Features

~~None.~~

PDF AQ-5: The Project would be designed to provide overnight truck parking inside of the Project site. This design feature would encourage trucks to not park overnight near sensitive receptors and prevent further exposure to criteria pollutants during the operation of the Project. No quantitative credit was taken in the air quality analysis for this design feature.

Comment A1.20: This comment suggests that the City of Riverside conduct a review of the following references: (1) State of California – Department of Justice: Warehouse Project: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act, (2) SCAQMD 2022 Air Quality Management Plan (specifically Appendix IV-A, Appendix IV-B, and Appendix IV-C), and (3) United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation, and to incorporate additional mitigation measures as applicable to the Project.

Response A1.20: The City considered the references provided by SCAQMD when developing the mitigation measures for the Project. In addition, SCAQMD does not specify which mitigation measures they are recommending within the references. Furthermore, CEQA does not require adoption of every potential mitigation measure and only requires adoption of feasible mitigation that will "substantially lessen" a project's significant impacts (CEQA Guidelines Section 15041). The Draft EIR's mitigation measures are consistent with and support the overarching recommendations in the provided references, as further discussed below.

(1) State of California – Department of Justice: Warehouse Project: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act

The Draft EIR's Air Quality analysis concluded that the Project would have less than significant impacts and determined that no mitigation is required. In addition, the Project is consistent with the State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act.

The purpose of the Attorney General's Warehouse Projects: Best Practices document (Best Practices document) is to help lead agencies pursue CEQA compliance and promote environmentally-just development as they confront warehouse project proposals; while CEQA analysis is project-specific, the Attorney General's Warehouse Projects: Best Practices document provides information on feasible best practices and mitigation measures which have been adapted from other warehouse projects in California (Department of Justice, 2022, page 2).

The Best Practices document encourages jurisdictions to engage in proactive planning by adopting land use designations and zoning that channel development into appropriate areas, and setting minimum standards for logistics projects through general plan policies, local ordinances, and good neighbor policies (Department of Justice, 2022, page 3). As stated in Section 3, *Project Description*, of the Draft EIR, the Project site has a General Plan Land Use designation of Industrial (I) and is zoned as General Industrial. The primary intent of the Industrial land use designation is to allow for manufacturing and wholesaling, commercial uses, and warehouse and distribution facilities only at specific locations. The purpose of the Industrial zone is to provide areas appropriate for a wide variety of industrial, manufacturing, and support uses that have the potential to provide jobs and generate tax revenue in Riverside, while protecting residential neighborhoods, schools,

parks, playgrounds, day care centers, nursing homes, hospitals and other public places from nuisances or hazards associated with such activities. In addition, the City of Riverside adopted Good Neighbor Guidelines (GNG-2020) in November 2020. The goals of the City's GNG-2020 are to ensure that new industrial developments: (1) ensure air quality and health risks are evaluated, (2) evaluate and minimize noise impacts, and (3) protect residential uses and neighborhood character of the City. The City's Planning division has reviewed the plans and determined that the proposed Project is in compliance with the City's Good Neighbor Policy.

The Best Practices document also encourages robust community engagement and provides examples of best practices for community engagement for CEQA compliance (Department of Justice, 2022, page 4). The City engaged in community engagement, per CEQA Guidelines and City policies. A Notice of Preparation was published on December 12, 2024 to notify the public and other agencies about the Project, request their input/comments, and invite them to a virtual scoping meeting, which was held on Thursday, January 9, 2025. The notice included a project description and was provided by mail to residents and posted on the City's website. In addition, the Draft EIR was also circulated for a 45-day public and public-agency review from Thursday, June 26th to Monday, August11th, 2025. As set forth above, in response to public comments to the Draft EIR, the Project implemented new Project Design Features, including [add.]

The Best Practices document provides warehouse siting and design considerations to reduce environmental and air quality impacts and recommends siting warehouse facilities at least 1,000 feet from property lines of the nearest sensitive receptor (Department of Justice, 2022, page 5). As discussed on page 5.3-19 of the Draft EIR, the closest sensitive receptors to the Project site is a housing assistance shelter located at 2801 Hulen Place, approximately 67.3 meters (or 221 feet) east of the Project site; however, while the 1,000 feet distance may be appropriate for larger industrial development, the Project-specific Air Quality, Energy, and GHG Report determined that the Project will not result in significant impacts to Air Quality, Energy, and GHG, nor will it result in significant health risk impacts, even to nearby sensitive receptors (Draft EIR page 5.3-22 through 5.3-21).

In addition, consistent with the warehouse siting and design considerations included in the Best Practices document, the Project's design provides adequate amounts of on-site parking and complies with setbacks established by the City's Code of Regulations. The truck courts are located in between the two buildings to shield trucking operations from public views (refer to Draft EIR Figure 3-8, *Conceptual Site Plan*). The Project would also include approximately 22,240 SF (or 0.51 acres) of ornamental landscaping around the perimeter of the site and in-between parking areas (refer to Draft EIR Figure 3-12, *Conceptual Landscape Plan*).

In addition, the Project Applicant is voluntarily including PDF AQ-4, as discussed above in Response A1.17, to incorporate a truck check-in point inside of the Project site, consistent with Best Practices for siting and designing warehouse facilities, to further reduce potential air quality impacts.

(2) SCAQMD 2022 Air Quality Management Plan (Appendix IV-A, Appendix IV-B, and Appendix IV-C)

The Project would be consistent with the SCAQMD 2022 Air Quality Management Plan (AQMP), specifically Appendix IV-A, IV-B, and IV-C as follows:

a) Appendix IV-A – SCAQMD's Stationary and Mobile Source Control Measures, included with the 2022 AQMP, aims to achieve the 2015 8-hour ozone National Ambient Air Quality Standards by 2037. As the Project would not result in significant impacts for construction or operational VOC or NOx for stationary and mobile sources, the Project would therefore be consistent with the SCAQMD's Stationary and Mobile Source Control Measures featured in Appendix IV-A of the 2022 AQMP.

b) Appendix IV-B – CARB's Strategy for South Coast, similarly to Appendix IV-A, identifies the strategies and controls to reduce ozone, specifically ground-level ozone. Ground-level ozone is

generated from NOx and VOC emissions. As the Project does not exceed SCAQMD's thresholds of significance for NOx and VOC (refer to Section 5.3 of the Draft EIR), the Project is consistent with Appendix IV-B and would not conflict with CARB's strategy for ground-level ozone control in the South Coast Air Basin.

c) Appendix IV-C – SCAG's Regional Transportation Strategy and Control Measure ensures consistency within the AQMP with the Southern California Association of Government's (SCAG's) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and Transportation Control Measures which addresses the 2015 8-hour ozone standards in the South Coast Air Basin. As discussed in Section 5.3 of the Draft EIR, the Project is consistent with SCAG's RTP/SCS; in addition, the Project would not exceed SCAQMD's significance thresholds of NOx or VOC emissions. As such, the Project would be consistent with SCAG's Regional Transportation Strategy and Control Measures outlined in Appendix IV-C of the 2022 AQMP.

(3) United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation

Regarding the United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation, the Project's potential environmental justice effects are social issues that are not considered effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include substantial discussion of environmental justice. Further, while CEQA requires that all feasible mitigation measures be utilized to minimize or eliminate any significant adverse impacts, as discussed in Section 5.3, *Air Quality*, of the Draft EIR, the Project would result in less than significant air quality impacts, including health risk impacts. As such, mitigation measures to mitigate air quality impacts are not required.

Comment A1.21: This comment discusses the applicability of South Coast Rule 2305 to the proposed Project and summarizes the requirements of Rule 2305 Warehouse Indirect Source Rule WAIRE Program. The comment states that project requirements, design features, and CEQA mitigation measures can be identified and implemented to help future warehouse operators meet their compliance obligations.

Response A1.21: The comment is informational in nature and does not raise a specific issue with the adequacy of the Draft EIR. South Coast Rule 2305 is applicable to buildings greater than 100,000 SF in size, as neither of the two buildings featured in the Project are greater than 100,000 SF in total building area, and are located on separate lots, Rule 2305 WAIRE Program would not be applicable. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is required or provided.

Comment A1.22: This comment states that SCAQMD is a Responsible Agency since air permits are required and SCAQMD will be required to make a decision on the adequacy of the CEQA document for its own use in issuing discretionary approvals. The comment summarizes other requirements for a Responsible Agency under CEQA. The comment states due to the requirements for Responsible Agencies, the Final EIR should be revised to include a discussion about any new stationary and portable equipment requiring SCAQMD permits and provide an evaluation of the air quality and greenhouse gas impacts.

Response A1.22: As described in Section 5.3, *Air Quality,* of the Draft EIR, it is anticipated that the proposed buildings would utilize two diesel-fueled fire pumps and two diesel-fueled emergency generators. To ensure a conservative analysis, the Draft EIR assumed that for the operation of the Project, the two diesel-fueled 238-horspower emergency generators would individually operate for up to 200 hours per year, which is conservative and consistent with SCAQMD's Rule 1470, which limits stationary sources. The assumed two diesel-fueled 238-horsepower fire pumps would individually operate for up to 50 hours per year, which

would also be consistent with SCAQMD's Rule 1470. These assumptions were incorporated into the Project's Air Quality, Energy, GHG, and HRA analyses to provide a conservative estimate of potential operational emissions. Pages 8 through 10 of the Draft EIR Section 5.3, *Air Quality*, already include a summary of potentially applicable SCAQMD rules.

In response to this comment, Section 2.0, *Errata*, of this Final EIR has been updated to include additional SCAQMD rules identified by the commenter that were not featured in the Draft EIR, including Rules 201, 445, 461, 1110.2, 1166, 2305, and Regulation XIII, as shown below. Section 2.0 has also been updated to identify SCAQMD as a Responsible Agency, with potential subsequent approvals including issuance of permits for installation and operation of backup generators and fire pumps. The Project will remain subject to SCAQMD's permitting authority, which ensures compliance with all applicable regulatory requirements related to air quality and toxic air contaminants. As the proposed Project is speculative industrial at this time, the applicable South Cost AQMD permits will be requested once a future tenant is identified. Accordingly, the Draft EIR provides a sufficient project description and analysis for reliance by SCAQMD in its role as a Responsible Agency under CEQA. Given these conservative assumptions and regulatory safeguards, the Draft EIR adequately addresses the comment, and no further revisions are warranted.

Draft EIR Sections 3.0, *Project Description*, and 5.3, *Air Quality*, have been revised to reflect these updates in Section 2.0, *Errata*, of this Final EIR and as shown below. This correction does not change the conclusions of the EIR, and the findings remain the same.

Page 3-46, Section 3.5, *Discretionary Approvals and Permits*, is revised as follows:

3.5 Discretionary Approvals and Permits

The City of Riverside is expected to use the information contained in this EIR for consideration of approvals related to and involved in the implementation of this Project. These include, but may not be limited to, the permits and approvals described below.

- Zoning Code (Map/Text) Amendment
- Development Agreement
- Tentative Parcel Map
- Design Review
- Certification of the Environmental Impact Report
- Approvals and permits necessary to execute the proposed Project, including but not limited to grading permit, building permit, etc.
- ~~In addition, the Project is subject to review and approval by the Riverside Airport Land Use Commission (ALUC) for the Zoning Code Map and text amendments.~~

The Following approvals are anticipated from responsible agencies:

- **Riverside Airport Land Use Commission (ALUC) approval of Project's proposed Zoning Code Map and text amendments.**
- **SCAQMD approval and issuance of permits for installation and operation of backup generators and fire pumps as well as compliance with all applicable regulatory requirements related to air quality and toxic air contaminates.**

Page 5.3-8, Section 5.3.2.3, *Regional Regulations*, is revised as follows:

5.3.2.3 Regional Regulations

SCAQMD Rules and Regulations

All projects are subject to SCAQMD rules and regulations. Specific rules applicable to the Project include the following:

Rule 201- Permit to Construct. A person shall not construct, alter, or operate equipment that may cause the issuance of air contaminants without first obtaining a permit from SCAQMD. This permitting requirement ensures review of potential air quality impacts prior to equipment installation or operation.

Rule 203 – Permit to Operate. A person shall not operate or use any equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants, or the use of which may reduce or control the issuance of air contaminants, without first obtaining a written permit to operate from the Executive Officer or except as provided in Rule 202. The equipment or agricultural permit unit shall not be operated contrary to the conditions specified in the permit to operate.

Rule 401 – Visible Emissions. A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines.

Rule 402 – Nuisance. A person shall not discharge from any source whatsoever such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any such persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

Rule 403 – Fugitive Dust. SCAQMD Rule 403 governs emissions of fugitive dust during and after construction. Compliance with this rule is achieved through application of standard Best Management Practices (BMP), such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.

Rule 403 requires project applicants to control fugitive dust using the best available control measures such that dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating an off-site nuisance. Applicable Rule 403 dust suppression (and PM10 generation) techniques to reduce impacts on nearby sensitive receptors may include, but are not limited to, the following:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Water active sites at least three times daily. Locations where grading is to occur shall be thoroughly watered prior to earthmoving.
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour (mph) or less.
- Suspend all grading activities when wind speeds (including instantaneous wind gusts) exceed 25 mph.
- Provide bumper strips or similar best management practices where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Replant disturbed areas as soon as practical.

- Sweep on-site streets (and off-site streets if silt is carried to adjacent public thoroughfares) to reduce the amount of particulate matter on public streets. All sweepers shall be compliant with SCAQMD Rule 1186.1, Less Polluting Sweepers.

Rule 445 – Wood Burning Devices. This rule prohibits the installation of wood-burning devices in any new development and is intended to reduce particulate matter emissions from such devices. Therefore, all new development must comply with SCAQMD Rule 445.

Rule 461 – Gasoline Transfer. This rule governs the transfer of gasoline into and out of stationary storage tanks and vehicle fuel tanks within the SCAQMD. The rule requires the use of CARB certified enhanced vapor recovery systems to control VOCs emissions during gasoline transfer operations. The rule establishes equipment, operation, maintenance, testing, and recordkeeping requirements for both storage tanks and dispensing systems to ensure they are vapor- and liquid-tight.

Rule 481 – Spray Coating. This rule applies to all spray painting and spray coating operations and equipment and states that a person shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:

- The spray coating equipment is operated inside a control enclosure, which is approved by the Executive Officer. Any control enclosure for which an application for permit for new construction, alteration, or change of ownership or location is submitted after the date of adoption of this rule shall be exhausted only through filters at a design face velocity not less than 100 feet per minute nor greater than 300 feet per minute, or through a water wash system designed to be equally effective for the purpose of air pollution control.
- Coatings are applied with high-volume low-pressure, electrostatic and/or airless spray equipment.
- An alternative method of coating application or control is used which has effectiveness equal to or greater than the equipment specified in the rule.

Rule 1108 - Volatile Organic Compounds. This rule governs the sale, use, and manufacturing of asphalt and limits the volatile organic compound (VOC) content in asphalt used in the Basin. This rule also regulates the VOC content of asphalt used during construction. Therefore, all asphalt used during construction of the Project must comply with SCAQMD Rule 1108.

Rule 1110.1 – Stationary Combustion Emissions. This rule governs emissions from stationary internal combustion engines and establishes emission limits for NOx, VOCs, and CO. This rule requires monitoring and testing to demonstrate compliance.

Rule 1113 – Architectural Coatings. No person shall apply or solicit the application of any architectural coating within the SCAQMD with VOC content in excess of the values specified in a table incorporated in the Rule.

Rule 1143 – Paint Thinners and Solvents. This rule governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content. This rule regulates the VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule.

Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. This rule sets requirements to control the emission of VOCs from excavating, grading, handling, and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition. Pursuant to SCAQMD Rule 1166, excavating or grading soil containing VOC materials shall:

- **Apply for, obtain, and operate per a mitigation plan pursuant to the requirements of SCAQMD Rule 1166. Monitor for VOC contamination at least once every 15 minutes commencing at the beginning**

of excavation or grading and record all VOC concentration readings. Handling VOC-contaminated soil at or from an excavation or grading site shall segregate VOC-contaminated stockpiles from non-VOC contaminated stockpiles such that mixing of the stockpiles does not take place. VOC contaminated soil stockpiles shall be sprayed with water and/or approved vapor suppressant and adequately covered with plastic sheeting for all periods of inactivity lasting more than one hour. A daily visual inspection shall be conducted of all covered VOC contaminated soil stockpiles to ensure the integrity of the plastic covered surfaces. Contaminated soil shall be treated or removed from an excavation or grading site within 30 days from the time of excavation.

Rule 1470 – Requirements for Stationary Diesel-fueled Internal Combustion and Other Compression Ignition Engines. This rule applies to any person who owns or operates a stationary compression ignition engine in the SCAQMD with a rated brake horsepower greater than 50. This rule sets operational hour requirement stating that new stationary emergency diesel engines shall not operate more than 50 hours a year for maintenance and testing. Additionally, under this rule, emergency generators shall operate for a maximum of 200 hours a year.

Rule 2305 – Warehouse Associated Mobile Sources. This rule outlines the reduction of local and regional emissions of nitrogen oxides and particulate matter, and to facilitate local and regional emission reductions with warehouses and associated mobiles sources. As the Project proposes one 99,850-SF building and one 99,950-SF building, it would thus be exempt from this rule as it applies to warehouses with greater than or equal to 100,000 SF of indoor floor space in any single building.

Regulation XIII – New Source Review. This regulation governs New Source Review (NSR) for new, relocated, or modified facilities that emit air contaminants. This regulation requires the application of Best Available Control Technology (BACT), analysis of potential emission increases, and the use of emission reduction credits to offset increases in nonattainment pollutants.

Comment A1.23: The commenter states that because SCAQMD will issue air permits, it will serve as a CEQA Responsible Agency. The comment references CEQA Guidelines Section 15096 regarding the duties of Responsible Agencies, including making findings, issuing a Statement of Overriding Considerations if necessary, and filing a Notice of Determination. The commenter further states that the Final EIR should identify SCAQMD as a Responsible Agency, evaluate all new stationary and portable equipment requiring air permits, and provide analysis of associated air quality, energy, and greenhouse gas impacts to ensure the adequacy of the CEQA document for AQMD's approvals.

Response A1.23: As discussed, in Response A1.22, Section 2.0, *Errata*, has been updated to adequately address SCAQMD as a responsible agency under CEQA, and no further revisions are warranted.

Draft EIR Section 3.0, *Project Description,* has been revised to reflect these updates in Section 2.0, *Errata*, of this Final EIR and as shown below. This correction does not change the conclusions of the EIR, and the findings remain the same.

Page 3-46, Section 3.5, *Discretionary Approvals and Permits*, is revised as follows:

3.5 Discretionary Approvals and Permits

The City of Riverside is expected to use the information contained in this EIR for consideration of approvals related to and involved in the implementation of this Project. These include, but may not be limited to, the permits and approvals described below.

- Zoning Code (Map/Text) Amendment
- Development Agreement
- Tentative Parcel Map

- Design Review
- Certification of the Environmental Impact Report
- Approvals and permits necessary to execute the proposed Project, including but not limited to grading permit, building permit, etc.
- ~~In addition, the Project is subject to review and approval by the Riverside Airport Land Use Commission (ALUC) for the Zoning Code Map and text amendments.~~

The Following approvals are anticipated from responsible agencies:

- **Riverside Airport Land Use Commission (ALUC) approval of Project's proposed Zoning Code Map and text amendments.**
- **SCAQMD approval and issuance of permits for installation and operation of backup generators and fire pumps as well as compliance with all applicable regulatory requirements related to air quality and toxic air contaminates.**

Comment A1.24: This comment concludes the SCAQMD's discussion and summarizes the standard practice for Lead Agencies when responding to Public Agencies comments. The comment also thanks the Lead Agency for giving the SCAQMD the opportunity to comment on the Draft EIR and contact information if future questions arise.

Response A1.24: The comment is conclusionary in nature and does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is required or provided.

Comment Letter A2: Riverside County Airport Land Use Commission, Date July 21, 2025

From:	Casas, Yesenia
To:	Assadzadeh, Candice
Cc:	Vega, Jaqueline
Subject:	[EXTERNAL] PR-2024-001666
Date:	Monday, July 21, 2025 12:13:16 PM
Attachments:	Outlook-pzpkutrf.png SLAS14AD4M25072111140.pdf ALUC application 5-13-24.pdf

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Hello,

Thank you for transmitting the above referenced project to ALUC for review. Please note that the proposed project is located within zone E of March Air Reserve airport influence area, and although the city of Riverside is consistent with the compatibility plan for the March Airport Land Use Compatibility Plan, review by the ALUC is still required because the project proposes a legislative actions (Change of Zone). C1.1

Attached is an application, please contact ALUC planner Jackie Vega cc'd here for any questions regarding your application.

Best regards,
Yesenia Casas
Executive Assistant I

Riverside County Airport Land Use Commission
4080 Lemon Street, 14th Floor
Riverside, Ca 92501
(951)955-5132
Ycasas@rivco.org
www.rcaluc.org

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County of Riverside California

3.2 Response to Comment Letter A2: Riverside County Airport Land Use Commission, Date July 21, 2025

Comment A2.1: This comment introduces the comment letter and states that the proposed Project is located within Zone E of March Air Reserve airport influence area. The comment states that due to the Project's location and proposed legislative action (Change of Zone), the Riverside County Airport Land Use Commission (ALUC) is required to review the Project for consistency with the March Airport Land Use Compatibility Plan. This comment included the application and contact information necessary to initiate the required compatibility review.

Response A2.1: The proposed Project was reviewed and approved by the Riverside County Airport Land Use Commission on May 5, 2025. The ALUC Director's Determination letter has been included as Appendix A of this Final EIR.

The following revisions have been included in Chapter 2, Errata:

> The Project site is located approximately 2.9 miles east of the Flabob Airport, a small public-use airport in the City of Jurupa Valley. The **nearest runway at** Flabob Airport**, Runway 6-24,** has an ~~easterly runway~~ elevation of ~~768~~ **approximately 750** feet above mean sea level (AMSL). In June 11, 2024, an Application for Major Land Use Action Review was submitted to the Riverside County Airport Land Use Commission (ALUC) for the proposed Project pursuant to ALUC Review Procedures. On May 5, 2025, ALUC determined that FAA review is required for structures exceeding 1,039 feet AMSL at the Project's distance from the Flabob Airport runway, however, the proposed building's top elevation is 935 feet AMSL, so FAA Obstruction Evaluation Service review is not warranted.

The Draft EIR analyzed the proposed Project buildings at a height of 46 feet. In accordance with the Conditions of Approval provided by the ALUC, incorporated as Mitigation Measures HAZ-2 through HAZ-5, the Project is consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. Thus, this comment does not contain any information requiring further changes to the EIR. No further response is warranted.

Comment Letter O1: Sierra Club and R-NOW, Dated August 11, 2025

SIERRA CLUB

R-NOW

Sierra Club – San Gorgonio Chapter – Box Springs Group
R-NOW – Riverside Neighbors Opposing Warehouses

SENT VIA EMAIL
August 11, 2025

Candice Assadzadeh – Senior Planner
Donesia Gause – City Clerk
City of Riverside
Email: cassadzadeh@riverside.ca.gov; city_clerk@riversideca.gov

RE: Public comment for the Massachusetts Point Project, SCH# 2024120391 - DEIR

Dear City of Riverside Planning Staff,

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Massachusetts Point Project ('The Project'), SCH # 2024120391.

The Project aims to demolish an existing building to develop two ~99,900 sq.ft. warehouses on the property adjacent to Roberta Street and Kansas Avenue in the Hunter Industrial Park neighborhood of Riverside. The community census tract 06065030502 on which the project occurs is in the 99th percentile for cumulative impact score in CalEnviroScreen4.0- it is literally a top 1% Environmental Justice (EJ) neighborhood in the state.[1] The project is within an industrial zone, adjacent to a Homeless Service Campus, and is within an employment emphasis and housing emphasis overlay subdistrict. The project requires an overlay zone change to industrial emphasis subdistrict, a development agreement, design review, and an EIR. O1.1

In our review, the Sierra Club Box Springs Group and R-NOW appreciate that this project is an industrial infill project and therefore has lower potential impacts than projects that are greenfield development. However, we remain concerned that project objectives and analysis are biased towards an industrial warehouse project that is incompatible with the overlay zone goals, local and regional air quality, and perpetuate a legacy of industrial harm to this community. O1.2

1. Environmental Justice was not included as its own topic area to be analyzed as an environmental impact in the draft EIR, despite the community status as a 99th percentile community in CalEnviroScreen4.0 and similar designation in the General Plan EJ element. Our NOP comment letter and the California Department of Justice asked for an analysis relative to the Warehouse Best Practice Document. Environmental Justice was instead O1.3

[1] https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40

1

treated as a piecemeal set of objectives and best practices do not appear to addressed substantively in the DEIR. Additionally, please compare the project to the Office of the Attorney General's Warehouse Projects: Best Practices document[2]. O1.3 cont. O1.4

2. The Cumulative Impacts Project list omitted tens of millions of square feet of regional warehouses that are approved and under environmental review that were submitted as part of our comment letter on the project. This project's impacts are not limited to a 2-mile radius of the project. There are over 4,000 warehouses already in the Inland Empire with over 1,000 in Riverside County. There are 13,000 acres of warehouses approved or under environmental review. The Cumulative Impacts of these projects are not limited to the local streets of the neighborhood in which they are located, as indicated by the scope of the air quality, greenhouse gas, jobs, and other analyses. Please include a more comprehensive analysis of the regional impacts of warehouses on transportation, jobs, air quality, and greenhouse gas emissions. Here is a partial list of warehouse projects that are nearby to include. O1.5
    a. World Logistics Center – 40.4M square feet – Approved – Moreno Valley
    b. Bloomington Business Park – 2.4M square feet – Approved – San Bernardino County
    c. West Valley Logistics Center – 2.1M - Fontana
    d. Sycamore Hills Distribution Center – 600,000 sq. ft. - Riverside
    e. Moreno Valley Business Park Building 5 – 425,000 sq.ft. – Moreno Valley
    f. Harvest Landing Retail Project – 5.7M square ft. – Perris
    g. Beaumont Pointe – 5.0M square ft. – Beaumont
    h. The District at Jurupa Valley – 1.5M sq. ft. – Jurupa Valley
    i. Agua Mansa Logistics Center – 1.2M sq.ft. – Colton
    j. Merwin Property Project – 1.0M sq.ft. -Moreno Valley
    k. Crystal Windows HQ project – 400,000 sq.ft. – Moreno Valley
    l. All the projects along Old 215
        i. Old 215 Business Park
        ii. Cottonwood and Edgemont Project
        iii. Bay & Day Commerce Center
        iv. Old 215 Industrial Park Project
        v. Moreno Valley Business Center Project
        vi. First Industrial Warehouse at Day Street Project
3. The Project land-use analysis handwaves away the problems of the overlay zone. The site is within the Employment and Housing Emphasis overlay zones. The problem with ignoring this overlay zone is that adjacent land-uses in these overlay zones become less probable as the industrial zone expands and erodes the adjacent land-use compatibility. Warehouses and industrial uses beget warehouses and industrial uses; people don't want to live next to these land uses. The project undermines the existing overlay zone and plan; it is less likely that the overlay zone will ever be implemented if the first project approved in the overlay zone is nonconforming. O1.6
4. While the City of Riverside Good Neighbor Policy does not preclude housing near industrial zones, it does preclude building warehouses within certain setbacks of residential zoning. Current proposed guidelines would also add a cumulative impact standard that might impact O1.7

[2] https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf

2

the suitability of the parcel splitting shenanigans involved in keeping the two buildings in this project just below the 100,000 square foot threshold[3]. O1.7 cont.

5. Table 5.14-6 indicates that the City of Riverside is jobs-rich, with more than the 1.5 jobs per dwelling unit considered housing-rich. There is no indication that the City of Riverside is on-track to add 43,000+ units. In the last 4 years, the City has added just over 600 constructed units per year[4]. At the current pace of construction, the City will add about 15,000 units by 2050. Thus, the 2050 projections in Connect SoCal 2024 are aspirational and not based on actual trends in unit construction of over 20,000 units. The assertion that this area needs more warehouse jobs is absurd and unsupported in the present. The City of Riverside is not jobs-poor and certainly doesn't need more low-density warehouse jobs when that is the largest sector of employment in the region. O1.8

Summary

Thank you again for the opportunity to provide comments on the Project. Please keep the Sierra Club Box Springs Group and R-NOW notified of all documents and meetings related to the Massachusetts Point Project. O1.9

Sincerely,

Michael McCarthy, PhD
Sierra Club - Box Springs Group - Co-Conservation Chair
R-NOW – Vice-Chair
Email: mikem@radicalresearch.llc

P.O. Box 1325
Moreno Valley, CA 92556-1325

[3] https://riversideca.legistar.com/LegislationDetail.aspx?ID=7508406&GUID=3590D12D-A435-43D3-BB52-8D292F48AAEB&Options=&Search=

[4] https://www.hcd.ca.gov/planning-and-community-development/housing-element-implementation-and-apr-dashboard

3

3.3 Response to Comment Letter O1: Sierra Club and R-NOW, Dated August 11, 2025

Comment O1.1: This comment provides an introduction to the comment letter and provides a summary of the proposed Project. The comment also states that the Project site is located in a census tract ranked in the 99th percentile for cumulative impacts in CalEnviroScreen4.0, making it one of the top one percent Environmental Justice neighborhoods in California.

Response O1.1: The comment is introductory in nature, provides a summary of the proposed Project, and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issues. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Comment O1.2: The comment acknowledges that the Project, as an industrial infill development, would have lower potential impacts compared to greenfield projects. The comment expresses concern that the Project objectives and analysis are biased towards the Project. The comment also states that the Project is incompatible with the overlay zone goals, local and regional air quality, and perpetuates industrial harm to the community.

Response O1.2: This comment does not provide any substantial evidence that the Project would result in significant environmental impacts. The Project's proposed Zone Change would correct the existing inconsistency between the site's General Plan Land Use designation of Industrial (I), zoning designation of I - General Industrial, and Innovation District (ID) Overlay Zone subdistricts Employment Emphasis (EE) and Housing Emphasis (HE). As described in Section 5.3, Air Quality, of the Draft EIR, implementation of the proposed Project would not exceed thresholds related to air quality and impacts related to regional and localized air quality would be less than significant with implementation of existing regulations related to air quality, included as PPPs AQ-1 through AQ-4. These include compliance with SCAQMD Rules 403 (dust control), 1113 (low-volatile organic compounds paints), and 1470 (regulation of diesel-fuel internal combustion engines). The comment does not contain any information requiring changes to the EIR. No further response is warranted.

Comment O1.3: The comment states that environmental justice was not analyzed as a standalone topic in DEIR. The comment also states that warehouse best practices were not substantively addressed in the DEIR and requests that the Project be compared to Office of the Attorney General's Warehouse Projects: Best Practices document.

Response O1.3: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. CEQA is an environmental protection statute that is concerned with physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). Moreover, CEQA also requires a project to evaluate its impacts in relation to changes in an area's population, housing needs and coverage under adequate public services. The Project's potential environmental justice effects are social issues that are not considered effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Thus, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include substantial discussion of environmental justice.

The purpose of the Attorney General's Warehouse Projects: Best Practices document (Best Practices document) is to help lead agencies pursue CEQA compliance and promote environmentally-just development as they confront warehouse project proposals; while CEQA analysis is project-specific, the Attorney General's Warehouse Projects: Best Practices document provides information on feasible best practices and mitigation measures which have been adapted from other warehouse projects in California (Department of Justice, 2022, page 2).

The Best Practices document encourages jurisdictions to engage in proactive planning by adopting land use designations and zoning that channel development into appropriate areas, and setting minimum standards for logistics projects through general plan policies, local ordinances, and good neighbor policies (Department of Justice, 2022, page 3). As stated in Section 3.0, *Project Description*, of the Draft EIR, the Project site has a General Plan Land Use designation of Industrial (I) and is zoned as General Industrial. The primary intent of the Industrial land use designation is to allow for manufacturing and wholesaling, commercial uses, and warehouse and distribution facilities only at specific locations. The purpose of the Industrial zone is to provide areas appropriate for a wide variety of industrial, manufacturing, and support uses that have the potential to provide jobs and generate tax revenue in Riverside, while protecting residential neighborhoods, schools, parks, playgrounds, day care centers, nursing homes, hospitals and other public places from nuisances or hazards associated with such activities. In addition, the City of Riverside adopted Good Neighbor Guidelines (GNG-2020) in November 2020. The goals of the City's GNG-2020 are to ensure that new industrial: (1) ensure air quality and health risks are evaluated, (2) evaluate and minimize noise impacts, and (3) protect residential uses and neighborhood character of the City. The City's Planning division has reviewed the plans and determined that the proposed Project is in compliance with the City's Good Neighbor Policy.

The Best Practices document also encourages robust community engagement and provides examples of best practices for community engagement for CEQA compliance (Department of Justice, 2022, page 4). The City engaged in community engagement, per CEQA Guidelines and City policies. A Notice of Preparation was published on December 12, 2024 to notify the public and other agencies about the Project, request their input/comments, and invite them to a virtual scoping meeting, which was held on Thursday, January 9, 2025. The notice included a project description and was provided by mail to residents and posted on the city's website. In addition, the Draft EIR was also circulated for a 45-day public and public-agency review from Thursday, June 26th, 2025 and ending Monday, August 11th, 2025.

The Best Practices document provides warehouse siting and design considerations to reduce environmental and air quality impacts and recommends siting warehouse facilities at least 1,000 feet from property lines of the nearest sensitive receptor (Department of Justice, 2022, page 5). As discussed on page 5.3-19 of the Draft EIR, the closest sensitive receptors to the Project site is a housing assistance shelter located at 2801 Hulen Place, approximately 67.3 meters (or 221 feet) east of the Project site; however, while the 1,000 feet distance may be appropriate for larger industrial development, the Project-specific Air Quality, Energy, and GHG Report determined that the Project will not result in significant impacts to Air Quality, Energy, and GHG, nor will it result in significant health risk impacts (Draft EIR page 5.3-22 through 5.3-21).

In addition, consistent with the warehouse siting and design considerations included in the Best Practices document, the Project's design provides adequate amounts of on-site parking and complies with setbacks established by the City's Code of Regulations. The truck courts are located in between the two buildings to shield trucking operations from public views (refer to Draft EIR Figure 3-8, C*onceptual Site Plan*). The Project would also include approximately 22,240 SF (or 0.51 acres) of ornamental landscaping around the perimeter of the site and in-between parking areas (refer to Draft EIR Figure 3-12, C*onceptual Landscape Plan*).

Lastly, the Best Practices document provides a list of suggested mitigation measures for air quality and greenhouse gas emissions, noise impacts, traffic impacts, and other significant environmental impacts (Department of Justice, 2022, page 7-13). As summarized in Table 1-1 of the Draft EIR, implementation of the proposed Project would not exceed any CEQA thresholds with implementation of the following Mitigation Measures (MM): MM BIO-1, MM CUL-1, MM GEO-1, MM HAZ-1, MM HAZ-2, MM HAZ-3, MM HAZ-4, MM HAZ-5, MM HAZ-6, MM HAZ-7, MM TCR-1, MM TCR-2, MM TCR-3, MM TCR-4. All impacts related to the following topics would be less than significant with implementation of the above-mentioned mitigation measures: Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, and Tribal Cultural Resources. All other environmental topics were found to have

no impacts or less than significant impacts without mitigation in the Draft EIR. Although the Air Quality Report prepared for the Project determined that impacts to air quality would be less than significant, the Project Applicant is voluntarily including the following measures as Project Design Features (PDFs) to further reduce potential impact.

PDF AQ-1: The Project would use light-colored paving and roofing materials. This design feature would reduce heat absorption, thereby lowering cooling demands and associated energy use, which in turn would reduce operational air quality impacts. No quantitative credit was taken in the air quality analysis for this design feature.

PDF AQ-2: The Project would use Energy Star heating, cooling, and lighting devices and appliances. This design feature would increase energy efficiency and reduce electricity demand, which in turn would reduce operational air quality impacts. No quantitative credit was taken in the air quality analysis for this design feature.

PDF AQ-3: The Project would be designed to include the installation of signs at every truck exit providing directional information to the trucks' routes. This design feature would prevent nearby sensitive receptors from further exposure to criteria pollutants during the operation of the Project. No quantitative credit was taken in the air quality analysis for this design feature.

PDF AQ-4: The Project would have a truck check-in point inside of the Project site, consistent with best practices for siting and designing warehouse facilities. This design feature would help manage truck circulation on-site and reduce idling on surrounding roadways, thereby minimizing operational exposure of nearby sensitive receptors to criteria pollutants. No quantitative credit was taken in the air quality analysis for this design feature.

PDF AQ-5: The Project would be designed to provide overnight truck parking inside of the Project site. This design feature would encourage trucks to not park overnight near sensitive receptors and prevent further exposure to criteria pollutants during the operation of the Project. No quantitative credit was taken in the air quality analysis for this design feature.

Draft EIR Section 5.3, *Air Quality*, has been revised to reflect these updates in Section 2.0, *Errata*, of this Final EIR and shown in the following Responses above: A1.13, A1.14, A1.15, A1.17, and A1.19. This correction does not change the conclusion of the EIR, and the findings remain the same No further response is warranted.

Comment O1.4: The comment states that the cumulative project list omitted tens of millions of square feet of regional warehouse development. The comment states that Project impacts are not limited to a two-mile radius of the Project site and that there are over 4,000 warehouses in the Inland Empire, including over 1,000 warehouses in Riverside county, as well as 13,000 acres of warehouse projects approved or under review. The comment requests a more comprehensive analysis of regional impacts of warehouses on transportation, jobs, air quality, and greenhouse gas emissions and provides a list of warehouse projects to be included.

Response O1.4: CEQA Guidelines Section 15130(b)(1) states that the information utilized in an analysis of cumulative impacts should come from one of the following, or a reasonable combination of the two:

- A list of past, present, and probable future projects producing related or cumulative impacts, including those projects outside the control of the lead agency; or
- A summary of projections contained in an adopted local, regional, or statewide plan or related planning document that describes or evaluates conditions contributing to the cumulative effect.

Pursuant to CEQA Guidelines Section 15355(b) cumulative impacts must be assessed by taking into account "the project when added to other closely related past, present, and reasonably foreseeable probably future projects." In deciding which Related Projects must be analyzed, CEQA Guidelines Section 15130(b)(3) instructs the lead agency to "define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used."

When assessing Related Projects lists specifically, courts ask "whether it was reasonable and practical to include the projects and whether, without their inclusion, the severity and significance of the cumulative impacts were reflected adequately." (*City of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 906 ("*Long Beach*"), quoting *Environmental Protection & Information Center v. California Dept. of Forestry & Fire Protection* (2008) 44 Cal.4th 459, 525.) But the selection of the assessment area for cumulative impacts is "left to the agencies' expertise," and "[a]bsent a showing of arbitrary action, [courts] assume that the agencies have exercised this discretion appropriately." (*Long Beach* at 908, quoting in part *Ebbetts Pass Forest Watch v. Department of Forestry & Fire Protection* (2004) 123 Cal.App.4th 1331, 1351.)

The City's 2025 Traffic Impact Analysis Guidelines (TIA Guidelines) were utilized to determine the cumulative projects listed in Draft EIR Table 5-1, *Cumulative Projects List* (Draft EIR Section 5.0, *Environmental Impact Analysis)*. As discussed on page 14 of the TIA Guidelines, the City requires all projects within a one-mile radius from any project boundary to be included in the cumulative project's list. For a conservative analysis (and as standard practice) the City's Traffic Division requires a radius measuring one mile plus half of the longest side of the project. For this Project, following City's guidance and standard practices, the radius for cumulative projects was determined to be 5,655 feet.

As such, the Project has adequately analyzed cumulative project impacts, including impacts on transportation, jobs, air quality, and greenhouse gas emissions. The comment does not identify substantial evidence showing that a cumulative impact would occur from its list of other projects located at a significant distance beyond the 5,655-foot radius from the Project, and does not contain any information requiring changes to the EIR. No further response is warranted.

Comment O1.5: This comment states that the Project's land-use analysis dismisses the Employment and Housing Emphasis overlay zones. The comment also states that the approval of the Project could impact the implementation of the overlay zoning plan and compatibility of adjacent land uses.

Response O1.5: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The Zone Change Amendment was discussed in the Draft EIR on pages 3-1, 3-25, 3-46, 5.11-10, 5.11-26, 5.14-8, 5.14-9. As discussed in Section 3.0, *Project Description*, the proposed Project has a General Plan Land Use designation of Industrial (I) and is zoned I - General Industrial. The site is also located within the Innovation District (ID) Overlay Zone, specifically within the Employment Emphasis (EE) and Housing Emphasis (HE) subdistricts. The proposed Zone Change is still in alignment with the existing General Plan Land Use Designation. The proposed Zone Change would not affect the zoning designations or existing land uses of the neighboring parcels. The comment does not contain any information requiring changes to the EIR. No further response is warranted.

Comment O1.6: This comment states that the City of Riverside's Good Neighbor Policy restricts the development of warehouses within certain setbacks of residential zoning. The comment also states that the City is proposing new guidelines that would introduce a cumulative impact standard that may affect the Project's proposed parcel split and building sizes.

Response O1.6: Compliance with the City's Good Neighbor Policy is to be verified by the City's Planning division during the Design Review process. The City's Planning division has reviewed the plans and determined that the proposed Project is in compliance with the City's Good Neighbor Policy. The proposed

site design does not identify potential significant environmental impacts. Thus, potential impacts related to compliance with the City's Good Neighbor Policy would not occur.

The comment also references the Riverside City Council Meeting Agenda for August 19, 2025. The referenced guideline is a Planning Commission recommendation for revisions to industrial development standards that has not yet been adopted. As such, it is not applicable to the proposed Project. The comment does not present new information requiring changes to the Draft EIR. No further response is warranted.

Comment O1.7: This comment states that Draft EIR Table 5.14-6 indicated that the City of Riverside is job rich. The comment states that the City is not on track to add 43,000 plus units and that the 2050 projections in Connect SoCal 2024 are not based on actual trends. The comment states that the City is not job poor and does not need more warehousing jobs.

Response O1.7: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As seen in Table 5.14-6 of the Draft EIR, the City of Riverside had a jobs to housing ratio of 1.68 in 2019, which would be considered job-rich. Based on SCAG's 2024-2050 RTP/SCS population and growth forecast, the job to housing ratio is projected to decrease to 1.49 by 2050, which would be considered housing-rich. The proposed Project would contribute to achieving a more balanced job to housing ratio by additional employment opportunities the community.

The comment expresses disagreement with SCAG's long-range projections, stating they are not based on "actual trends." The RTP/SCS is the region's official growth forecast, developed through an extensive process, and has been adopted by SCAG for use by local agencies. Reliance on these adopted forecasts is consistent with CEQA practice and ensures consistency with regional planning assumptions. The comment does not present substantial evidence that SCAG's projections are invalid, nor does it provide an alternative data source that would be more appropriate for the cumulative analysis.

The comment does not identify any new significant impact or deficiency in the Draft EIR analysis, and no further response or revision is required.

Comment O1.8: This comment concludes the letter by requesting that the Sierra Club Box Springs Group and R-NOW be notified of all documents and meetings related to the Project.

Response O1.8: The comment is conclusory in nature and does not raise a specific issue with the adequacy of the Draft EIR evaluation. As substantiated by the responses above, none of the conditions arise which would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. No new significant environmental impact would result from the Project or from a new mitigation measure proposed to be implemented; there is no substantial increase in the severity of an environmental impact; no feasible project alternative or mitigation measure considerably different from others previously analyzed that would lessen the environmental impacts of the proposed Project; and the Draft EIR is not fundamentally inadequate **or** conclusory in nature.

Sierra Club Box Springs Group and R-NOW will be added to the notification list for the Project and no further response is warranted.

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4. Mitigation Monitoring and Reporting Summary

4.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires a lead or public agency that approves or carries out a project for which an Environmental Impact Report (EIR) has been certified, which identifies one or more significant adverse environmental effects and where findings with respect to changes or alterations in the project have been made, to adopt a "…reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment" (Public Resources Code Sections 21081, 21081.6).

A Mitigation Monitoring and Reporting Program (MMRP) is required to ensure that adopted mitigation measures are successfully implemented. The City of Riverside is the Lead Agency for the Project and is responsible for implementation of the MMRP. This report describes the MMRP for the Project and identifies the parties that will be responsible for monitoring implementation of the individual mitigation measures in the MMRP.

4.2 MITIGATION MONITORING AND REPORTING PROGRAM

The MMRP for the Project will be active through all phases of the Project, including design, construction, and operation. The attached table identifies the mitigation program required to be implemented by the City of Riverside for the Project. The table identifies mitigation measures required by the City of Riverside to mitigate or avoid significant impacts associated with the implementation of the Project, the timing of implementation, and the responsible party or parties for monitoring compliance.

The MMRP also includes a column that will be used by the compliance monitor (individual responsible for monitoring compliance) to document when implementation of the measure is completed. As individual Plans, Programs, and Policies, Project Design Features (PDF), and mitigation measures are completed, the compliance monitor will sign and date the MMRP, indicating that the required actions have been completed.

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Table 4-1: Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
AESTHETICS				
PPP AES-1: Light and Glare. All lights shall be directed and/or shielded to prevent the light from adversely affecting adjacent properties. No structure or lighting feature shall be permitted which creates adverse glare. A photometric plan shall be provided that indicates the amount of light emanating from the proposed/existing light fixtures to comply with City of Riverside Municipal Code Chapter 19.556, Outdoor Lighting.	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
PDF AES-1: Lighting Design. The Project's lighting would be designed to adhere to the recommended lighting practices in the Attorney General's Warehouse Projects Best Practices. All Project lighting would be designed to be directed into the interior of the site. Additionally, all Project lighting would include use of full cut-off light shields and/or anti-glare lighting.	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
AIR QUALITY				
PPP AQ-1: Rule 403. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403, which includes the following: • All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions. • The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the project are watered, with complete coverage of disturbed areas, at least 3 times daily during dry weather; preferably in the mid-morning, afternoon, and after work is done for the day. • The contractor shall ensure that traffic speeds on unpaved roads and project site areas are reduced to 15 miles per hour or less.	Prior to demolition, grading, and construction permits.	City of Riverside Engineering Division and Building & Safety Division.	City approval of Final plans.	Initials: _____ Date: _____
PPP AQ-2: Rule 1113. The Project is required to comply with the provisions of SCAQMD Rule 1113. Only "Low-Volatile Organic Compounds" paints (no more than 50 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications shall be used.	Prior to demolition and construction permits.	City of Riverside Building & Safety Division.	City approval of Final plans.	Initials: _____ Date: _____
PPP AQ-3: Rule 1470. The Project is required to obtain permits from SCAQMD for the proposed diesel fire pumps and emergency generators	Prior to issuance of certificate of occupancy.	City of Riverside Building & Safety Division.	City approval of Final plans.	Initials: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
and would be required to comply with Rule 1470, regulating the use of diesel-fueled internal combustion engines.				Date: _____
PPP AQ-4: Rule 402. The Project is required to comply with the provisions of SCAQMD Rule 402. The Project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.	Prior to demolition and construction permits.	City of Riverside Building & Safety Division.	City approval of Final plans.	Initials: _____ Date: _____
PDF AQ-1: The Project would use light-colored paving and roofing materials. This design feature would reduce heat absorption, thereby lowering cooling demands and associated energy use, which in turn would reduce operational air quality impacts. No quantitative credit was taken in the air quality analysis for this design feature.	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
PDF AQ-2: The Project would use Energy Star heating, cooling, and lighting devices and appliances. This design feature would increase energy efficiency and reduce electricity demand, which in turn would reduce operational air quality impacts. No quantitative credit was taken in the air quality analysis for this design feature.	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
PDF AQ-3: The Project would be designed to include the installation of signs at every truck exit providing directional information to the trucks' routes. This design feature would prevent nearby sensitive receptors from further exposure to criteria pollutants during the operation of the Project. No quantitative credit was taken in the air quality analysis for this design feature.	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
PDF AQ-4: The Project would have a truck check-in point inside of the Project site, consistent with best practices for siting and designing warehouse facilities. This design feature would help manage truck circulation on-site and reduce idling on surrounding roadways, thereby minimizing operational exposure of nearby sensitive receptors to criteria pollutants. No quantitative credit was taken in the air quality analysis for this design feature.	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
PDF AQ-5: The Project would be designed to provide overnight truck parking inside of the Project site. This design feature would encourage trucks to not park overnight near sensitive receptors and prevent further exposure to criteria pollutants during the operation of the Project. No	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
quantitative credit was taken in the air quality analysis for this design feature.				
BIOLOGICAL RESOURCES				
Mitigation Measure BIO-1: Nesting Birds. Vegetation within and surrounding the Project site has the potential to provide refuge cover from predators, perching sites and favorable conditions for avian nesting that could be impacted by construction activities associated with the Project. Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.3, 3511, and 3513 of the California Fish and Game Code prohibit the take, possession, or destruction of birds, their nests or eggs). In order to protect migratory bird species, a nesting bird clearance survey should be conducted prior to any ground disturbance or vegetation removal activities that may disrupt the birds during the nesting season. Consequently, if avian nesting behaviors are disrupted, such as nest abandonment and/or loss of reproductive effort, it is considered "take" and is potentially punishable by fines and/or imprisonment. If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside of a no-disturbance buffer. The size of the no-disturbance buffer will be determined by the wildlife biologist and will depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise, species habituation, and topographical barriers. These factors will be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. A biological monitor should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have	Prior to issuance of grading permits.	City of Riverside Engineering Division and Building & Safety Division.	Submittal of Pre-construction Clearance Survey report to City by Qualified Biologist.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.				
CULTURAL RESOURCES				
PPP CUL-1: Discovery of Human Remains: In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts.The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The County Coroner will notify the Native American Heritage Commission in accordance with California Public Resources Code 5097.98. According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052) determined in consultation between the Project proponent and the MLD. In the event that the Project proponent and the MLD are in disagreement regarding the disposition of the remains, State law will apply and the median and decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)).	During ground-disturbing activities.	City of Riverside Community & Economic Development Department and Building & Safety Division.	Provide evidence to the City that developer/permit holder has complied with State Health and Safety Code Section 7050.5. Provide evidence to the City that the San Bernardino County Coroner has contacted the Native American Heritage Commission within 24 hours of discovery.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
Mitigation Measure CUL-1: Inadvertent Discovery of Archaeological Resource. During implementation of the project, in the event that archaeological materials are encountered during ground-disturbing activities, work must be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for Professional Archaeology (United States Department of the Interior, 1983). Construction activities may continue in other areas. If the find is considered a "resource" the archaeologist shall pursue either protection in place or recovery, salvage and treatment of the deposits. Recovery, salvage and treatment protocols shall be developed in accordance with applicable provisions of Public Resource Code Section 21083.2 and CEQA Guidelines 15064.5 and 15126.4 in consultation with the City. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if unique archaeological resources cannot be preserved in place or left in an undisturbed state, recovery, salvage, and treatment shall be required at the developer/applicant's expense.	During ground-disturbing activities.	City of Riverside Community & Economic Development Department and Building & Safety Division.	Provide evidence to the City that a qualified Archeological has been retained. Submittal of report that documents the finding to the City.	Initials: _____ Date: _____
GEOLOGY AND SOILS				
PPP GEO-1: CBC Compliance. The Project is required to comply with the California Building Standards Code (CBC) as included in Chapter 16.08 of the Riverside Municipal Code to preclude significant adverse effects associated with seismic and soils hazards. CBC-related and geologist and/or civil engineer specifications for the proposed Project are required to be incorporated into grading plans and building specifications as a condition of construction permit approval.	Prior to grading and construction permits.	City of Riverside Engineering Division and Building & Safety Division.	City approval of construction plans.	Initials: _____ Date: _____
Mitigation Measure GEO-1: Paleontological Resources. Construction plans and specifications shall state that in the event that potential paleontological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified paleontologist (who meets the Society of Vertebrate Paleontology's (SVP, 2010) definition for qualified profession paleontologist) has evaluated the find. If a fossil is determined to be significant, the qualified paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at a public, non-profit institution	During ground-disturbing activities.	City of Riverside Community & Economic Development Department and Building & Safety Division.	City approval of construction plans. Halt any work in the event of paleontological resource discovery. Provide evidence to the City that a	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
with a research interest in the material and with retrievable storage, such as the Western Science Center in Riverside County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school. If any fossil remains are discovered, the qualified paleontologist shall make a recommendation whether monitoring shall be required for the continuance of earth moving activities. Prior to commencement of grading activities, the City of Riverside Public Works Department, shall verify that all project grading and construction plans specify the requirements herein related to the unanticipated discovery of paleontological resources. After completion of the salvage and curation of any resources, the qualified paleontologist shall prepare a report summarizing the results of the monitoring and salvage efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the City Director of the City Community Development Department, or designee, and the Western Science Center in Riverside County.			qualified paleontologist has been retained. Submittal of report that documents the finding to the City.	
HAZARDS AND HAZARDOUS MATERIALS				
PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Public Works Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain coverage under the construction general permit from the State Water Resource Control Board (SWRCB). The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.	Prior to issuance of any grading permits.	City of Riverside Public Works Department.	Provide evidence of compliance with the NPDES requirement to the City Public Works Department. Submit a NOI, develop and submit a SWPPP, and submit a MMRP for the construction site.	Initials: _____ Date: _____
PPP HAZ-1: SCAQMD Rule 1166. Prior to issuance of grading or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that the planned excavation contractor possesses a current SCAQMD Rule 1166 Various Locations Mitigation Plan. The excavation contractor's Rule 1166 plan would provide for	Prior to issuance of grading or excavation permits.	City of Riverside Building and Safety Division.	Submit verification to the City Building and Safety Division that the planned	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
compliance with these requirements provided the plan remains valid and is approved by SCAQMD: Monitor for VOC contamination at least once every 15 minutes commencing at the beginning of excavation or grading in areas where VOCs are suspected to potentially be present and record all VOC concentration readings. Handling VOC-contaminated soil at or from an excavation or grading site shall segregate VOC-contaminated stockpiles from non-VOC contaminated stockpiles such that mixing of the stockpiles does not take place. VOC-contaminated soil stockpiles shall be sprayed with water and/or approved vapor suppressant and cover them with plastic sheeting for all periods of inactivity lasting more than one hour. A daily visual inspection shall be conducted of all covered VOC contaminated soil stockpiles to ensure the integrity of the plastic covered surfaces. Contaminated soil shall be treated or removed from an excavation or grading site within 30 days from the time of excavation.			excavation contractor possesses a current SCAQMD Rule 1166 Various Locations Mitigation Plan.	
PDF HAZ-1: Vapor Intrusion Mitigation System (VIMS). A Vapor Intrusion Mitigation System (VIMS) shall be incorporated into the Project design to prevent potential vapor intrusion risks.	Prior to Project approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
Mitigation Measure HAZ-1: Soil Management Plan (SMP) and Health and Safety Plan (HSP). Prior to issuance of a grading or excavation permit a SMP shall be approved by the Santa Ana Regional Water Quality Control Board. The SMP will describe general methods for the identification and management of soils potentially impacted by VOCs Site-wide. In areas where VOCs are suspected to potentially be present in soil (i.e., in the vicinity of areas previously identified on the North Parcel and any other areas in which potential VOC impacted soils are otherwise identified), earth working activities will be conducted by a contractor with a current SCAQMD Rule 1166 Various Locations Plan, and the SMP will describe the methods to identify, manage, and dispose of "VOC Contaminated Soil" as defined in Rule 1166 (i.e., soils emitting VOCs at concentrations greater than 50 parts per million [ppm] as hexane). The SMP will also describe more conservative monitoring criteria and thresholds for targeted excavation of soils in suspected historical VOC release areas on the North Parcel (and potentially other locations in the event that a previously unidentified VOC or petroleum hydrocarbon release area is discovered during earth working activities).	Prior to issuance of a grading or excavation permit.	Santa Ana Regional Water Quality Control Board.	Santa Ana Regional Water Quality Control Board approval of SMP and HSP.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
Per SCAQMD Rule 1166, the SMP shall include protocols for minimizing VOC emissions into the atmosphere during construction, including excavation, grading, handling, and treatment of VOC-impacted soils, and shall describe associated notification requirements, monitoring requirements, soil handling protocols, and recordkeeping requirements. In the event that "VOC-contaminated soil" is identified as defined within Rule 1166, the soil shall be handled in accordance with the Rule and the associated Various Locations Plan. A project-specific Health and Safety Plan (HASP) shall also be prepared in accordance with California Occupational Safety and Health Administration (OSHA) standards and other applicable rules and regulations, which will incorporate appropriate health and safety precautions to be implemented to protect workers and the public from exposure to potentially hazardous substances that may be encountered during these earth working activities. As part of the SMP, the Project Applicant and/or the construction contractor(s) shall retain a qualified professional to prepare a site-specific HSP in accordance with federal Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1910.120) and California OSHA regulations (8 CCR Section 5192). The HSP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-disturbing activities from exposure to hazardous materials, including vapor and soil contamination.				
Mitigation Measure HAZ-2: Outdoor lighting. Any new outdoor lighting that is installed shall be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.	Prior to Project approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
Mitigation Measure HAZ-3: Prohibited Uses/Activities. The following uses/activities are not included in the proposed project and shall be prohibited at this site: 1. Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator. 2. Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or	Prior to Project approval.	City of Riverside Planning Division.	City approval of Final plans and Conditions of Approval.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
towards an aircraft engaged in a straight final approach towards a landing at an airport. 3. Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. (Such uses include landscaping utilizing water features, aquaculture, outdoor production of cereal grains, sunflower, and row crops, composting operations, wastewater management facilities, artificial marshes, trash transfer stations that are open on one or more sides, recycling centers containing putrescible wastes, construction and demolition debris facilities, fly ash disposal, and incinerators. 4. Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation. 5. Any use which results in a hazard to flight.				
Mitigation Measure HAZ-4: Notice of Airport in Vicinity. The "Notice of Airport in Vicinity" shall be provided to all prospective purchasers and occupants of the property.	Prior to Occupancy.	Project Applicant.	Provide evidence to RCALUC that the "Notice of Airport in Vicinity" has been provided to prospective purchasers and occupants of the property.	Initials: _____ Date: _____
Mitigation Measure HAZ-5: Electromagnetic Component Notification. March Air Reserve Base shall be notified of any land use having electromagnetic radiation. Sources of electromagnetic radiation include radio wave transmission in conjunction with remote equipment inclusive of irrigation controllers, access gates, etc.	Prior to Occupancy.	Project Applicant.	Provide notification of any land use having electromagnetic radiation to RCALUC.	Initials: _____ Date: _____
HYDROLOGY AND WATER QUALITY				
PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Public Works Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI)	Prior to issuance of any grading permits.	City of Riverside Public Works Department.	Provide evidence of compliance with the NPDES requirement to the City Public Works Department.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.			Submit a NOI, develop and submit a SWPPP, and submit a MMRP for the construction site.	
PPP HYD-2: WQMP. Prior to the issuance of any grading permits, a completed Water Quality Management Plan (WQMP) shall be submitted to and approved by the City's Public Works Department. The WQMP shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.	Prior to issuance of any grading permits.	City of Riverside Public Works Department.	City's Public Works Department approval of WQMP.	Initials: _____ Date: _____
PUBLIC SERVICES				
PPP PS-1: The Project is required to pay school impact fees in accordance with SB 50 at the time of building permit issuance. The school impact fee for commercial/industrial developments within the RUSD boundary is $0.84 per SF, which would equal approximately $167,874 for the Project.	At the time of building permit issuance.	Riverside Unified School District.	Provide evidence to City that the school impact fees have been paid.	Initials: _____ Date: _____
RECREATION				
PPP R-1: Park and Recreation Development Fees. Pursuant to Municipal Code Chapters 16.44, 16.60, and 16.76, park development fees are imposed on the construction or placement of applicable nonresidential construction in accordance with the schedule of fees adopted by the City Council.	Prior to the issuance of a building permit.	City of Riverside Parks and Recreation Department.	Provide evidence to City that the park development fees have been paid.	Initials: _____ Date: _____
TRANSPORTATION				
PDF TRA-1: Chicago Avenue/Massachusetts Avenue Intersection Improvements: The Project would change the intersection control on Chicago Avenue/Massachusetts Avenue intersection to all-way stop (AWSC) control.	Prior to the issuance of Certificate of Occupancy.	City of Riverside Public Works Department – Traffic Division.	City approval of Final Plans.	Initials: _____ Date: _____
PDF TRA-2: Chicago Avenue/3rd Street Intersection Improvements: The Project would implement protected-permissive left-turn phasing for the northbound and southbound left-turn approaches by installing flashing yellow signal head and "Left Turn Yield On Flashing" sign on Chicago Avenue/3rd Street intersection.	Prior to the issuance of Certificate of Occupancy.	City of Riverside Public Works Department – Traffic Division.	City approval of Final Plans.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
TRIBAL CULTURAL RESOURCES				
Mitigation Measure CUL-1: Inadvertent Discovery of Archaeological Resource. As listed in Section *5.5, Cultural Resources*.	During ground-disturbing activities.	City of Riverside Community & Economic Development Department and Building & Safety Division.	Halt any work in the event of inadvertent discoveries of archeological resources. Provide evidence to the City that a qualified Archeological has been retained. Submittal of report that documents the finding to the City.	Initials: _____ Date: _____
MM-TCR-1: Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.	Prior to grading permit issuance.	City of Riverside Engineering Division and Building & Safety Division.	Provide copy of consultation logs showing Applicant's effort to contact interested tribes and the outcome of any such consultation Halt any work in the event of inadvertent discoveries of archeological resources.	Initials: _____ Date: _____
MM-TCR-2: Project Archaeologist: Prior to the issuance of a grading permit, the Property Owner/Developer shall provide a letter from a County certified Archaeologist and Paleontologist stating that the Property Owner/Developer has retained these individuals, and that the	Prior to the issuance of a grading permit.	City of Riverside Building & Safety Division.	Provide a letter to the City from a certified Archaeologist and Paleontologist	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
Archaeologist and Paleontologist shall be on site during all grading and other significant ground-disturbing activities.				
MM-TCR-3: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries: 1. **Consulting Tribes Notified:** Within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the city evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation. 2. **Temporary Curation and Storage:** During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need approval of the consulting tribe(s); and 3. **Treatment and Final Disposition:** The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources to the consulting tribe(s). The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same: a. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed; b. Upon consultation with the tribe(s) and if parties agree that reburial on project site is not feasible, a curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79, if agreed upon by the tribe(s), and therefore will be professionally curated. The collections and associated records shall be transferred, including title, to an appropriate curation	During ground-disturbing activities.	City of Riverside Community & Economic Development Department and Building & Safety Division.	Provide the City that with evidence of notification to consulting tribes in the event of inadvertent discoveries; a copy of the completed Phase IV Monitoring Report.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation; c. If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Museum of Riverside by default; and d. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes.				
MM-TCR-4: Cultural Sensitivity Training: The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.	Prior to start of grading.	City of Riverside Planning Division.	Provide City with sign-in sheet from Cultural Sensitivity Training for all construction personnel and included in the Phase IV Monitoring Report.	Initials: _____ Date: _____
UTILITIES AND SERVICE SYSTEMS				
PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Public Works Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain coverage under the construction general permit from the State Water Resource Control Board (SWRCB). The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing	Prior to issuance of any grading permits.	City of Riverside Public Works Department.	Provide evidence of compliance with the NPDES requirement to the City Public Works Department.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.			Submit a NOI, develop and submit a SWPPP, and submit a MMRP for the construction site.	
PPP HYD-2: WQMP. Prior to the issuance of any grading permits, a completed Water Quality Management Plan (WQMP) shall be submitted to and approved by the City's Public Works Department. The WQMP shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.	Prior to issuance of any grading permits.	City of Riverside Public Works Department.	City's Public Works Department approval of WQMP.	Initials: _____ Date: _____