# PLANNING CASE No. PR-2020-000519

## ADDENDUM TO MITIGATED NEGATIVE DECLARATION

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<u>Appendix</u>	Document Title
A	Initial Study/Mitigated Negative Declaration, City of Riverside Case Nos. P14-0841, P14-0842, P14-0843, P14-0844, P14-0846 & P14-0847
В	Air Quality Impact Analysis, dated October 26, 201 and prepared by Urban Crossroads, Inc.
С	Cultural Resources Report, dated February 16, 2021 and prepared by Brian F. Smith and Associates, Inc.
D1	Geotechnical Investigation Report Update, dated April 4, 2019 and prepared by Salem Engineering Group, Inc.
D2	Change of Geotechnical Consultant of Record, dated September 13, 2021 and prepared by NorCal Engineering
E1	Phase I Environmental Site Assessment, dated December 14, 2020 and prepared by Hazard Management Consulting, Inc.
E2	Limited Phase II Soil Vapor Investigation, dated January 7, 2021 and prepared by Hazard Management Consulting, Inc.
F	Greenhouse Gas Analysis, dated October 26, 2021 and prepared by Urban Crossroads, Inc.
G	Paleontological Assessment, dated October 5, 2021 and prepared by Brian F. Smith and Associates, Inc.
H1	Preliminary Hydrology Calculations, dated February 19, 2021 and prepared by Thienes Engineering
H2	Project Specific Water Quality Management Plan, dated March 2021 and prepared by Thienes Engineering

I

- Noise Impact Analysis, dated October 18, 2021 and prepared by Urban Crossroads, Inc. J Trip Generation Assessment, dated May 18, 2021 and prepared by Urban Crossroads, Inc.
- Κ Determination of Biologically Equivalent or Superior Preservation Analysis, dated October 9, 2018 and prepared by Helix Environmental Planning
- L Mobile Source Health Risk Assessment, dated October 26, 2021 and prepared by Urban Crossroads, Inc.

# ACRONYMS AND ABBREVIATIONS

<u>Acronym</u>	<u>Definition</u>
AB-#	Assembly Bill
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMSL	Above Mean Sea Level
APN	Assessor Parcel Number
APZ II	Accidental Potential Zone II
AQMP	Air Quality Management Plan
В/ОР	Business/Office Park
BMP	Business and Manufacturing Park
BMPs	Best Management Practices
С	Commercial
CALGreen	California Building Standards Code Title 24
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CR	Commercial Retail
CR-SP	Commercial Retail and Specific Plan
CWA	Clean Water Act
dBA	A-weighted decibels
DPM	Diesel Particulate Matter
DR	Design Review
e.g.	exempli gratia meaning "for example"
EIR	Environmental Impact Report
ESA	Environmental Site Assessment
FTA	Federal Transit Administration
GHG	Greenhouse Gas
GPA	General Plan Amendment
HRA	Health Risk Assessment
i.e.	id est meaning "that is"
IRWMP	Integrated Regional Water Management Pla

# **ACRONYMS AND ABBREVIATIONS**

<u>Acronym</u>	<u>Definition</u>
IS	Initial Study
ISR	Indirect Source Rule
ITE	Institute of Transportation Engineers
IWMA	Integrated Waste Management Act
Leq	Equivalent continuous (average) sound level
LOS	Level of Service
LSTs	localized Significance Thresholds
MARB/IP	March Air Reserve Base/Inland Port
MEIR	Maximally Exposed Individual Receptor
MEIW	Maximally Exposed Individual Worked
MND	Mitigated Negative Declaration
MRZ	Mineral Resource Zone
MSHCP	Multiple Species Habitat Conservation Plan
MTCO2e	Metric Tons of Carbon Dioxide Equivalent per year
NPDES	National Pollutant Discharge Elimination System
NWP	Nationwide Permit
RCALUCP	Riverside County Airport Land Use Compatibility Plan
RCRCD	Riverside-Corona Resources Conservation District
RFD	Riverside Fire Department
RRG-CAP	Riverside Restorative Growthprint Climate Action Plan
RWQCB	Regional Water Quality Control Board
SB-#	Senate Bill
SCAQMD	South Coast Air Quality Management District
SGMA	Sustainable Groundwater Management Act
s.f.	Square Feet
SPA	Specific Plan Amendment
SWPPP	Stormwater Pollution Prevention Plan
TCRs	Tribal Cultural Resources
USACOE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
VMT	Vehicle Miles Traveled

**T&B Planning, Inc.** Page viii

## **ACRONYMS AND ABBREVIATIONS**

<u>Acronym</u> <u>Definition</u>

VOCs Volatile Organic Compounds

WMA Waste Management Act

WQMP Water Quality Management Plan

WRCOG Western Riverside Council of Governments

ZCA Zone Change Amendment

## 1.0 Introduction

## 1.1 PRIOR CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) COMPLIANCE

The California Environmental Quality Act (CEQA), a statewide environmental law contained in California Public Resources Code §§ 21000-21177, applies to most discretionary public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment.

This document is an Addendum to a Mitigated Negative Declaration (MND) that the City of Riverside City Council adopted on January 21, 2016, and which evaluated Case Nos. P14-0841, P14-0842, P14-0843, P14-0844, P14-0846 & P14-0847 (hereafter "Adopted MND"). Specifically, the City Council previously approved the following entitlements, which were evaluated in the Adopted MND: 1) an amendment to the Land Use and Urban Design Element of the General Plan to change the land use designation of approximately 3.7 acres from B/OP – Business Office Park to C – Commercial; 2) an Amendment to the Sycamore Canyon Business Park Specific Plan to expand the area in which commercial uses are permitted within the Sycamore Canyon Business Park area; 3) an Amendment to the Riverside Municipal Code (Title 19 - Zoning) to change the zoning designation of approximately 3.7 acres from BMP – Business and Manufacturing Park to CR – Commercial Retail; 4) Conditional Use Permit to modify and relocate an existing approximately 880 square foot (s.f.) vehicle wash facility; 5) Conditional Use Permit to establish a vehicle fuel station with an approximately 2,572 s.f. canopy to primarily serve diesel trucks; and 6) Design Review of the plot plan and building elevations related to the proposed construction of one 73,200 s.f. industrial building, two 4,000 s.f. commercial buildings, a 7,000 s.f. commercial building, a 2,572 s.f. diesel canopy and relocation of an existing 880 s.f. automated car wash.

Pursuant to a determination of Substantial Conformance dated October 11, 2018, Planning Cases P14-0841, P14-0842, P14-0843, P14-0844, P14-0846 and P14-0847 were modified to avoid an existing wetland on the subject property. Approved modifications included the following:

- 1. Removing the two 4,000 s.f. commercial buildings;
- 2. Decreasing the size of the Diesel Truck Fuel Canopy from 2,572 s.f. to 2,543 s.f.;
- 3. Increasing the overall size of the industrial building from 73,200 s.f. to 77,000 s.f. including:
- 4. Increasing the warehouse space from 52,937 s.f. to 74,500 s.f;
- 5. Increasing the office space from 3,500 s.f. to 5,000 s.f:
- 6. Removing the 17,645 s.f. manufacturing use;
- 7. Building elevations were modified to be consistent with the revised floor plan and original architectural design; and
- 8. Decreasing the number of parking spaces.

## 1.2 PROJECT OVERVIEW

On January 19, 2021, the Project Applicant, OZI Alessandro, LLC submitted the following applications to the City of Riverside pertaining to the same property evaluated in the Adopted MND:

- Planning Case No PR-2020-000519 including:
- General Plan Amendment (DP-2021-00052)
- Specific Plan Amendment (DP-2021-00053)
- Zoning Code Map Amendment (Rezone) (DP-2021-00054))
- Variance (DP-2021-00511)
- Grading Exception (DP-2021-00512)
- Design Review (DP-2021-00055)

The Project's application materials are on file with the City of Riverside Planning Division at 3900 Main Street, Riverside, CA 92501 and are hereby incorporated by reference. The Project Applicant filed the above applications with the City of Riverside seeking to revise the project that was previously approved and evaluated in the Adopted MND.

Pursuant to the Adopted MND and the subsequent Substantial Conformance, as part of the proposed Project, the Project Applicant would not construct the previously entitled commercial buildings, the vehicle fuel station or the vehicle wash facility, but would construct the previously entitled industrial building, at a larger size than previously approved. Specifically, the previously approved industrial warehouse building was planned at 73,200 s.f. and the currently proposed industrial warehouse building is planned at 115,676 s.f. (38,676 s.f. larger). Other changes compared to the previously entitled project include, but are not limited to, a reduction in the number of passenger automobile parking spaces from 304 spaces to 140 spaces; the addition of 34 truck trailer parking spaces; and an increase in the number of dock doors on the industrial building from four doors to 16 doors. The proposed Project is projected to generate approximately 232 employees, which is 68 fewer employees than the 300 employees projected for the previously-approved project. The site's driveway access point would occur at the same location (i.e., a shared driveway onto Alessandro Boulevard) as the previously entitled project. A small amount of land that was subject to the previously-approved entitlement and evaluated as part of the Adopted MND, specifically 13,532 SF (0.31 acre) is not a part of the currently-proposed Project.

The operational characteristics associated with the proposed warehouse use (e.g., traffic and traffic-related impacts) are less intensive than the commercial and industrial land uses evaluated for the Project site as part of the Adopted MND. Furthermore, re-design of the proposed warehouse building and the orientation of its dock doors further reduce any potential environmental impacts compared to those described in the Adopted MND.

#### A. Findings Pursuant to Section 15162 of the CEQA Guidelines

The provisions of CEQA Guidelines §§ 15162, 15163, and 15164 apply when the project being analyzed is a change to, or further approval for, a project for which an MND was previously adopted. CEQA Guidelines § 15162 states that if none of the circumstances listed below occur and only minor technical changes or

additions are necessary to update the previously approved/certified CEQA document, an Addendum may be prepared. In this case, none of the circumstances warranting a supplemental or subsequent MND exist. Thus, this document is an Addendum to the Adopted MND.

- Substantial changes are proposed in the project which will require major revisions of the Adopted MND due to the involvement of environmental effects or a substantial increase in the severity of previously identified significant effects:
  - a. Finding: As documented by the Project's Environmental Analysis (included herein in Section 5.0), there are no components of the currently proposed Project that would result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects beyond the impacts that were evaluated, disclosed, and mitigated to below a level of significance as part of the Adopted MND. The currently proposed Project would be subject to all applicable mitigation measures identified by the Adopted MND as would be enforced through the City's conditions of approval for the Project. Furthermore, the Adopted MND remains relevant to the currently-proposed Project and retains informational value, as the environmental setting is substantially similar to what is described in the Adopted MND and the currently proposed Project is substantially consistent with, and less development intensive overall, compared to the project described and evaluated by the Adopted MND.
- 2. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the Adopted Mitigated Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of Previously identified significant effects; or,
  - a. Finding: Subsequent to the City's approval of Case Nos. P14-0841, P14-0842, P14-0843, P14-0844, P14-0846 & P14-0847 and adoption of the Adopted MND, no substantial changes in the circumstances under which the Project would be undertaken have occurred that would require major revisions to the Adopted MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The physical condition of the Project site is the same or substantially similar as existed when the Adopted MND was prepared and the proposed Project is less development intensive than the previously-approved project.
- 3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Adopted Mitigated Negative Declaration was adopted, shows any of the following: (A) The project will have one or more significant effects not discussed in the Adopted Mitigated Negative Declaration; (B) Significant effects previously examined will be substantially more severe than shown in the Adopted Mitigated Negative Declaration; (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, and (D) Mitigation measures or alternatives which are considerably different from those analyzed in

the Adopted Mitigated Negative Declaration, would substantially reduce one or more significant effects on the environment.

a. Finding: No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the MND was adopted, has become available. The changes proposed as part of the currently proposed Project will not result in new significant environmental effects, or increase the severity of previously identified significant effects disclosed in the Adopted MND.

If none of the circumstances listed above have occurred and only minor technical changes or additions are necessary to update the previously approved/certified CEQA document, an Addendum may be prepared (see CEQA Guidelines § 15164). As described in detail herein, none of the above circumstances that warrant the preparation of a subsequent MND are present. Furthermore, the Adopted MND remains relevant to the currently-proposed Project and retains informational value, as the environmental setting is substantially similar to what is described in the Adopted MND, and the currently proposed Planning Case No. PR-2020-000519 is substantially consistent with the project described and evaluated by the Adopted MND and the subsequent Substantial Conformance. The proposed changes reflect a less development-intensive project and minor technical changes, none of which generate new significant effects that were not previously analyzed in the Adopted MND. Therefore, preparation of an addendum pursuant to CEQA Guidelines § 15164 is appropriate.

## 1.3 FINDINGS FOR THE PROPOSED PROJECT

The City of Riverside, serving as the CEQA Lead Agency for the proposed Project (See CEQA Guidelines §§ 15050–15051), determined in its independent judgement that the Project does not meet any of the circumstances from CEQA Guidelines § 15162 and that an Addendum to the Adopted MND (previously prepared for Case Nos. P14-0841, P14-0842, P14-0843, P14-0844, P14-0846 & P14-0847) is the appropriate CEQA compliance document for the Project. The City's finding is based on the following facts:

- a. As demonstrated in detail in Section 2.0, Environmental Setting, of this document, the Project would not require major revisions to the Adopted MND because implementation of the Project would neither result in any significant impacts to the physical environment that were not already disclosed in the Adopted MND nor result in substantial increases in the severity of the environmental impacts previously disclosed in the Adopted MND.
- b. Subsequent to the adoption of the MND, no substantial changes in the circumstances under which the Project would be undertaken have occurred that would require major revisions to the Adopted MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

There is no evidence in the public record that new information of substantial importance has become available that is applicable to the Project and/or the Project site, and which was not known and could not have been known with the exercise of reasonable diligence at the time the City of Riverside prepared the

Adopted MND. None of the conclusions of the Adopted MND would be altered as a result of current conditions or implementation of the proposed Project.

### 1.3.1 Lead Agency Contact Information

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## 2.0 Environmental Setting

### 2.1 EXISTING CONDITIONS

#### 2.1.1 Project Location

As shown on Figure 2-1, *Regional Map* and Figure 2-2, *Vicinity Map*, the Project site is located at the northeast corner of the intersection of Interstate 215 (I-215) and Alessandro Boulevard in the City of Riverside, California. The Project site includes Assessor Parcel Numbers (APNs) 263-100-005, 263-100-019, and 263-091-008; Section 10, Township 3 South, Range 4 West.

#### 2.1.2 Existing Site and Area Conditions

As depicted on Figure 2-3, *Aerial Photograph*, the Project site is Phone: approximately 8.82 acres of vacant undeveloped land. As shown on Figure 2-4, *USGS Topographic Map*, the elevation of the Project site ranges from 1,528 feet above mean sea level (AMSL) to 1,540 feet AMSL and gently slopes to the southwest. An ephemeral drainage bisects the center of the Project site and drains into a culvert off-site. In addition, there are depressions near the western edge of the Project site and the northeastern corner where water appears to pond seasonally. (HMC, 2020, p. 3) (ICF, 2014, p. 2)

#### 2.1.3 Surrounding Land Uses and Development

As identified on Table 2-1, *Surrounding Land Uses and Development*, the site is bound on all sides by roadways and developed land.

LOCATION	EXISTING USE			
Project site	Vacant undeveloped land			
North	Commercial development (Tuff Shed, Inland Plastics, Access Electric Supply), north of which is a			
	large industrial warehouse (Fellowship Warehousing & Logistics)			
South	Alessandro Boulevard			
East	Commercial development (Arco gas station, Meineke Car Care Center, Oil Changers) and a few			
	residential structures			
West	I-215 Northbound Freeway			

Table 2-1 Surrounding Land Uses and Development

#### 2.1.4 Existing General Plan Land Use and Zoning

As part of the Adopted MND, a General Plan Amendment (P14-0841) changed the General Plan Land Use designation of approximately 3.7 acres in the southern portion of the Project site from B O/P - Business/Office Park to C – Commercial. Also, as part of the Adopted MND, Zoning Code Amendment (Rezone) (P14-0843) changed the zoning of approximately 3.7 acres in the southern portion of the Project site from BMP-SP – Business and Manufacturing Park and Specific Plan to CR-SP – Commercial Retail and Specific Plan. Table 2-2, *Surrounding General Plan and Zoning*, identifies the surrounding General Plan and Zoning.

Table 2-2 Surrounding General Plan and Zoning

LOCATION	GENERAL PLAN DESIGNATION	ZONING		
Project	Commercial (C)	CR-SP - Commercial Retail and Specific Plan		
site		(Sycamore Canyon Business Park) Overlay Zones		
North	Business/Office Park (B/OP)	BMP-SP – Business and Manufacturing Park and		
		Specific Plan (Sycamore Canyon Business Park)		
		Overlay Zones		
South	Alessandro	Alessandro Boulevard		
East	ast Business/Office Park (B/OP) CR-SP — Commercial Retail a			
		(Sycamore Canyon Business Park) Overlay		
		Zones; and BMP-SP – Business and		
		Manufacturing Park and Specific Plan		
		(Sycamore Canyon Business Park) Overlay		
		Zones		
West	Interstate 215			

#### 2.1.5 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan

The March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (ALUCP) identifies land use standards and design criteria for new development located in the proximity of the March Air Reserve Base to ensure compatibility between the airport and surrounding land uses and to maximize public safety. At approximately 1.4 miles from the March Air Reserve Base, the Project site is located within Compatibility Zone B1-APZ II of the March Air Reserve Base /Inland Port ALUCP and is therefore, subject to the ALUCP. On April 8, 2021, the ALUC Development Review process found the Project to be consistent with the March Air Reserve Base//Inland Port Airport ALUCP subject to conditions as listed in the ALUC Development Review Letter is a part of the Project's Administrative Record available at the City of Riverside. (ALUC, 2021)

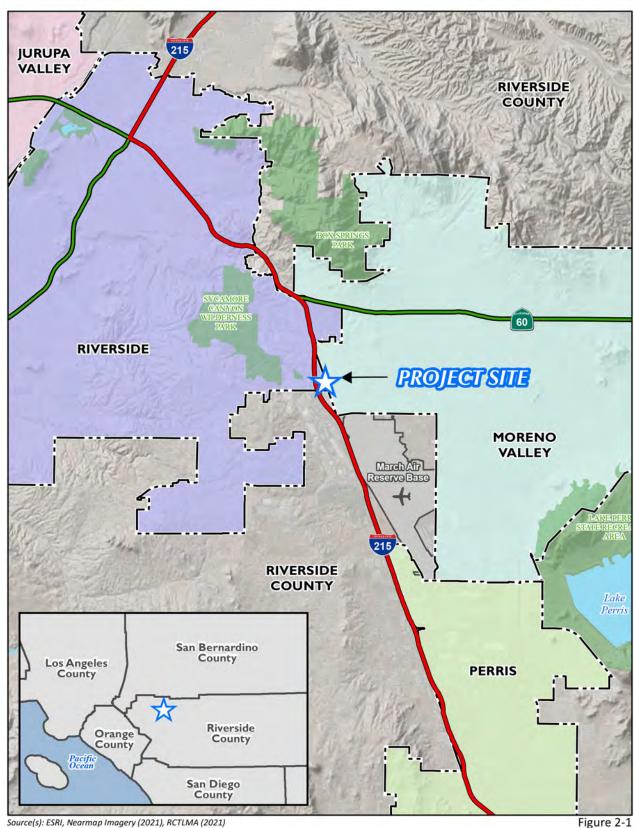
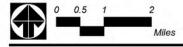
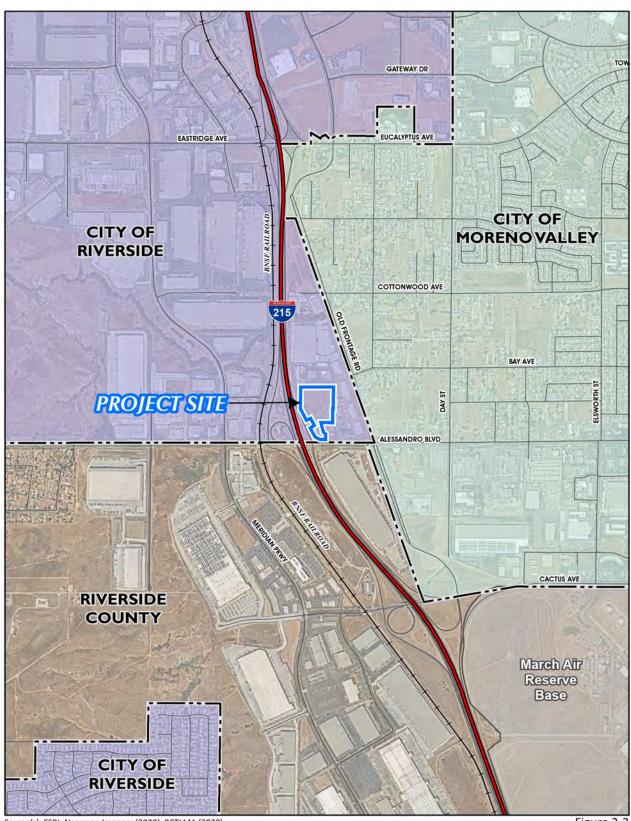


Figure 2-1



**Aerial Photograph** 



Source(s): ESRI, Nearmap Imagery (2020), RCTLMA (2020)

Figure 2-2

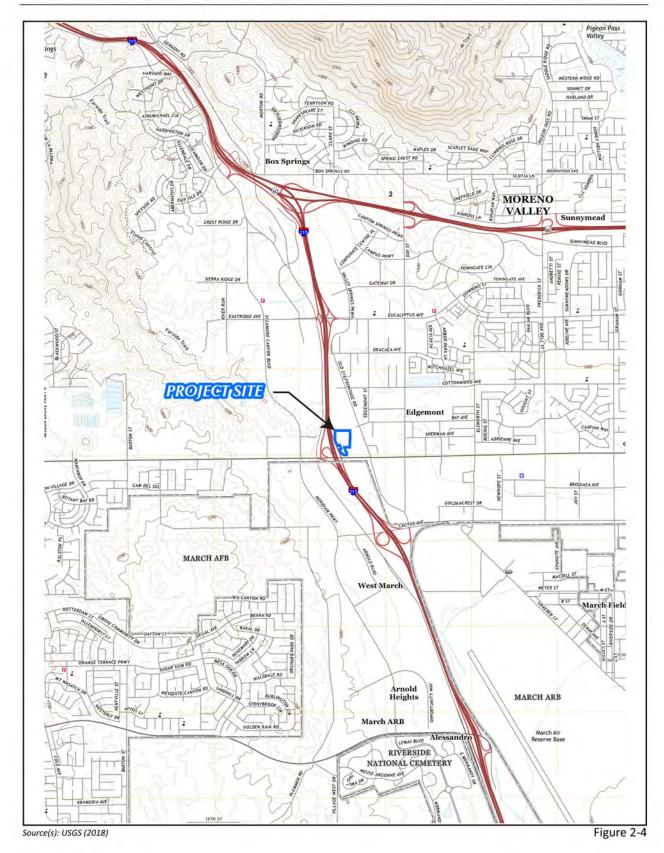


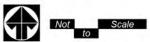
**Vicinity Map** 



0 100 200 400 Feet

**Aerial Photograph** 





**USGS Topographic Map** 

## 3.0 Project Description

The Project evaluated in this Addendum is located on approximately 8.82 acres on Assessor Parcel Numbers (APNs) 263-100-005, 263-100-019, and 263-091-008 at the northeast corner of the intersection of I-215 and Alessandro Boulevard in the City of Riverside, California. The Project involves the construction and operation of one 115,526 s.f. warehouse building and associated improvements. To accomplish the Project, the vacant site and the location of an adjacent car wash facility would be developed, which would entail demolition of the car wash structure and surrounding improvements.

The proposed Project consists of applications for a General Plan Amendment, Specific Plan Amendment, Zoning Code Map Amendment (Rezone), Variance, Grading Exception, and Design Review to revise the project that was previously approved, to allow for the construction and operation of the singular warehouse. A detailed description of the proposed Project is provided below.

## 3.1 PROPOSED DISCRETIONARY APPROVALS

The Project Applicant filed applications for the following discretionary actions, which are under consideration by the City of Riverside as Planning Case No. PR-2020-000519:

- General Plan Amendment (DP-2021-00052). As part of the entitled project, General Plan Amendment (Planning Case P14-0841) changed the General Plan Land Use designation of approximately 3.7 acres in the southern portion of the Project site from B/OP Business/Office Park to C Commercial. The proposed Project seeks to change the land use designation of the project site to B/OP Business/Office Park to allow for the warehouse development.
- Specific Plan Amendment (DP-2021-00053). The Project proposes to amend the Sycamore Canyon Business Park Specific Plan to change the Project site's land use designation from Industrial Support to Industrial to allow for warehouse development.
- Zoning Code Map Amendment (Rezone) (DP-2021-00054). As part of the entitled project, Zoning Code Map Amendment (Rezone) (Planning Case P14-0843) changed the zoning classification of approximately 3.7 acres in the southern portion of the Project site from BMP-SP Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones to CR-SP Commercial Retail and Specific Plan (Sycamore Canyon Business Park) Overlay Zones. The proposed Project seeks to change the zoning classification of the Project site from CR-SP Commercial Retail and Specific Plan (Sycamore Canyon Business Park) Overlay Zones to BMP-SP Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones, to allow for the warehouse development.
- Variance (DP-2021-00511). The Variance would allow for walls to be greater than 12 feet in height.

- Grading Exception (DP-2021-00512). The Grading Exception would allow for retaining walls to be higher than allowed by the Grading Code.
- **Design Review (DP-2021-00055)** is an application for the City's design review of the Project's site design and building elevations.

### 3.2 DEMOLITION PLAN

As shown on Figure 3-1, *Demolition Plan*, the Project Applicant proposes to demolish an off-site existing 1,073 s.f. building/structure (car wash) as well as the associated existing offsite improvements that occur on the car wash site within 100 feet of the property under existing conditions. As detailed on Figure 3-1, other than the existing building/structure, the demolition plan includes the removal of an existing block wall, chain link fence (portion), surface concrete, canopy, propane tank (propane connections would be capped), curb and gutter, and asphalt pavement. Utility manholes and all associated underground storage tanks would be protected in place.

The concrete materials that are to be demolished would be crushed and stockpiled onsite to be used as fill. In addition, all voids left from removal of the structures would be filled level. According to the Project's grading plan, the earthwork quantities would balance on site and no export or import of soils would be required.

## 3.3 OVERALL SITE PLAN

The Project Applicant proposes to consolidate the three parcels in to one 8.82-acre parcel as depicted on Table 3-1, *Anticipated Construction Equipment*. As shown on Figure 3-2, *Overall Site Plan*, the Project Applicant proposes to construct one approximately 115,526 s.f. concrete tilt-up warehouse building comprised of approximately 109,126 s.f. of warehouse space, approximately 3,200 s.f. of 1st floor office space, 3,200 s.f. of second floor office space, 16 dock doors, auto and trailer parking, a detention basin, drive aisles, 20-foot wide fire lanes, screen walls, metal entrance gates, a trash enclosure area, exterior ancillary lighting, signage, landscaping, and utility improvements. The office area is planned for the northwest portion of the warehouse building.

#### 3.3.1 Site Access and Circulation

The Project would replace the existing driveway and construct a 47-foot-wide driveway that would provide ingress/egress from/to Alessandro Boulevard. The driveway would replace the existing driveway that currently exists for the offsite (not-a-part) car wash that would be removed. As shown on Figure 3-3, *Conceptual Street Layout*, the Project would improve Alessandro Boulevard per City of Riverside Public Works standards. Auto vehicles would drive in to the site and access the auto parking lot that would be provided to the southwest of the building. Tractor trailers would enter the site from Alessandro Boulevard and proceed to the interior of the site to the location of the loading docks.

#### 3.3.2 Parking and Loading

As shown on Figure 3-2, 16 dock doors would be provided on the west side of the warehouse building. The Project would provide approximately 140 auto parking stalls and include the required standard, accessible, clean air/van pool, electric vehicle (EV) parking. Approximately 34 trailer parking stalls would be provided near the loading dock doors. As part of the application process, the Project Applicant provided an Alternative Site Plan that provides 318 auto parking stalls and no trailer parking, allowing for 85 percent of the building to be used for manufacturing.

#### 3.3.3 Architecture, Lighting, Walls,

As shown on Figure 3-4, Conceptual Architectural Elevations, the proposed warehouse building is designed at a maximum height of 44 feet 9 inches from the finished floor to the top of the concrete parapet. The building would be constructed with painted concrete tilt-up panels and aluminum storefront framing with tempered glass at all doors and sidelights adjacent to doors with glazing. All exterior and interior glazing would be tempered with either insulated glass, single light vision glass or spandrel glass with concrete behind it. Elevation colors would consist of a color scheme of white, gray and blue with gray reflective glazing and clear anodized mullions.

This Addendum assumes that the building would be operational 24 hours per day, seven (7) days per week, with exterior areas safely-lit at night. The Project Applicant submitted a Photometric Plan as part of the Project's application materials. The height of the lighting fixtures would comply with the development standards of the Sycamore Canyon Business Park Specific Plan as well as the City's Zoning Code. Plans submitted to the City of Riverside for future implementing permits and approvals (i.e., building permits) would be required to demonstrate compliance with the lighting standards of the City of Riverside.

As shown on Figure 3-5, Fencing Plan, the 8-foot-high neighbor fencing that exists along the northern property line would remain in place. The chain link fence that exists along the eastern property line would be removed and replaced with a 6-foot-high concrete tilt-up combination retaining and screen wall. Per Section 17.28.110.C of the Riverside Municipal Code (RMC), retaining walls exposed to public views shall not exceed 3-feet in height and retaining walls not visible from public view shall not exceed 6-feet in height. An existing off-site Caltrans chain link fence that is present west of the existing wetland and the Project's proposed detention basin, would remain in place. In areas where the existing offsite Caltrans chain link fence does not occur, the Project would provide a 12-foot-high concrete wall along the western property line and interior to the site on the south side of the trailer parking area and west of the trailer drive aisle. Interior to the site, a retaining wall would be provided around the portion of the auto parking area that faces I-215. An 8-foot-high metal swing gate would be provided at the entrance to the loading dock area with a 42-inch concrete guard wall on both sides of the loading dock area. An 8-foot-high fence with metal swing gate would be provided within the drive aisle on the eastern side of the building.

#### 3.3.4 Conceptual Landscaping Plan

As depicted on Figure 3-6, *Conceptual Landscaping Plan*, other than the driveway apron, a portion of the auto parking area, and the outer boundary of the existing wetland and the area of the Project's detention basin, the perimeter of the site would be landscaped. The site is also designed to provide landscaping

interior to the site adjacent to the building and within the auto parking area. Per RMP Section 19.580.090.A, trees in the auto parking lot would be provided at a ratio of one (1) tree for every four (4) parking spaces and placed in a manner that all portions of the lot receive tree shade. To provide a clear line of sight and avoid damage to landscape material, the truck court would not include landscaping.

#### 3.3.5 On-Site and Off-Site Utility Improvements

As depicted on Figure 3-7, Conceptual Utility Plan and Figure 3-8, Conceptual Storm Drain Plan, infrastructure improvements that are required to be installed on the Project site and connected to the surrounding infrastructure system include new storm drains, stormwater/water quality treatment facilities, sewer lines, water lines, and dry utility systems. A detention basin is proposed in the west-central portion of the Project site as part of the Project's stormwater drainage plan.

#### 3.4 CONSTRUCTION CHARACTERISTICS

Based on information supplied by the Project Applicant regarding the Project's construction schedule, as identified in Table 3-1, *Anticipated Construction Equipment Assumptions and Duration* and the technical reports attached to this Addendum, all anticipate that the proposed Project would be constructed in one phase over the course of approximately 12 to 13 months. For analysis purposes in this Addendum and its supporting technical studies, construction is anticipated to commence in Year 2021 and complete in Year 2022, at which time the building's eventual user(s) would take occupancy. Although actual construction may commence later, assuming a 2021 construction start date yields conservative analytical results, as older construction equipment is phased out of construction fleets over time and replaced with cleaner and less polluting pieces of equipment. After the car wash structure and its associated improvements are demolished, site preparation would occur. Next, the property would be mass-graded and underground infrastructure would be installed. Then fine grading would occur, surface materials would be poured, and the proposed building would be erected, connected to the underground utility system, and painted. Lastly, landscaping, fencing, screen walls, lighting, signage, and other site improvements would be installed.

Construction equipment is expected to operate on the Project site eight (8) hours per day. During a typical work day, construction equipment is not in continual use; each piece of equipment is used only periodically during a typical construction work day. Thus, eight (8) hours of daily use per piece of equipment is a reasonable assumption based on similar size and scale developments, and likely overstates the actual amount of time that each piece of construction equipment will operate on a daily basis. Construction workers would travel to the Project site by passenger vehicle and materials deliveries would occur by medium- and heavy-duty trucks.

#### 3.5 PROJECT OPERATIONAL CHARACTERISTICS

At the time this Addendum was prepared, the future user(s) of the proposed building was unknown. The building is designed such that business operations would be conducted within the enclosed building, with the exception of traffic movement, parking, and the loading, and unloading of tractor trailers at designated loading bays. As a practical matter, dock doors on warehouse buildings are not occupied by a

trailer at all times of the day. There are typically many more dock door positions on warehouse buildings than are needed for receiving and shipping volumes. The dock doors that are in use at any given time are usually selected based on interior building operation efficiencies. In other words, trucks ideally dock in the position closest to where the goods carried by the truck are stored inside the warehouse. As a result, many dock door positions are frequently inactive throughout the day. Pursuant to State law, on-road diesel-fueled trucks are required to comply with various air quality and greenhouse gas emission standards, including, but not limited to, the type of fuel used, engine model year stipulations, aerodynamic features, and idling time restrictions. Compliance with State law is mandatory and inspections of on-road diesel trucks subject to applicable State laws are conducted by the California Air Resources Board (CARB). During long-term operating conditions, employees, visitors, and vehicles hauling goods will travel to and from the Project site on a daily basis.

Using the trip generation rates given in the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition, 2017) for the proposed warehouse use, the Project is calculated to generate approximately 528 two-way vehicle trips per day (Urban Crossroads, Inc., 2021d, p. 3). Operational characteristics would differ slightly from those described in the adopted MND because the Project would operate as a warehouse facility instead of operating as a mixed commercial and industrial use. As Addendum Section 5.0 explains, the operational characteristics associated with the proposed warehouse use (e.g., traffic and traffic-related impacts) would be less intensive than the commercial and industrial land uses evaluated for the Project site as part of the Adopted MND.

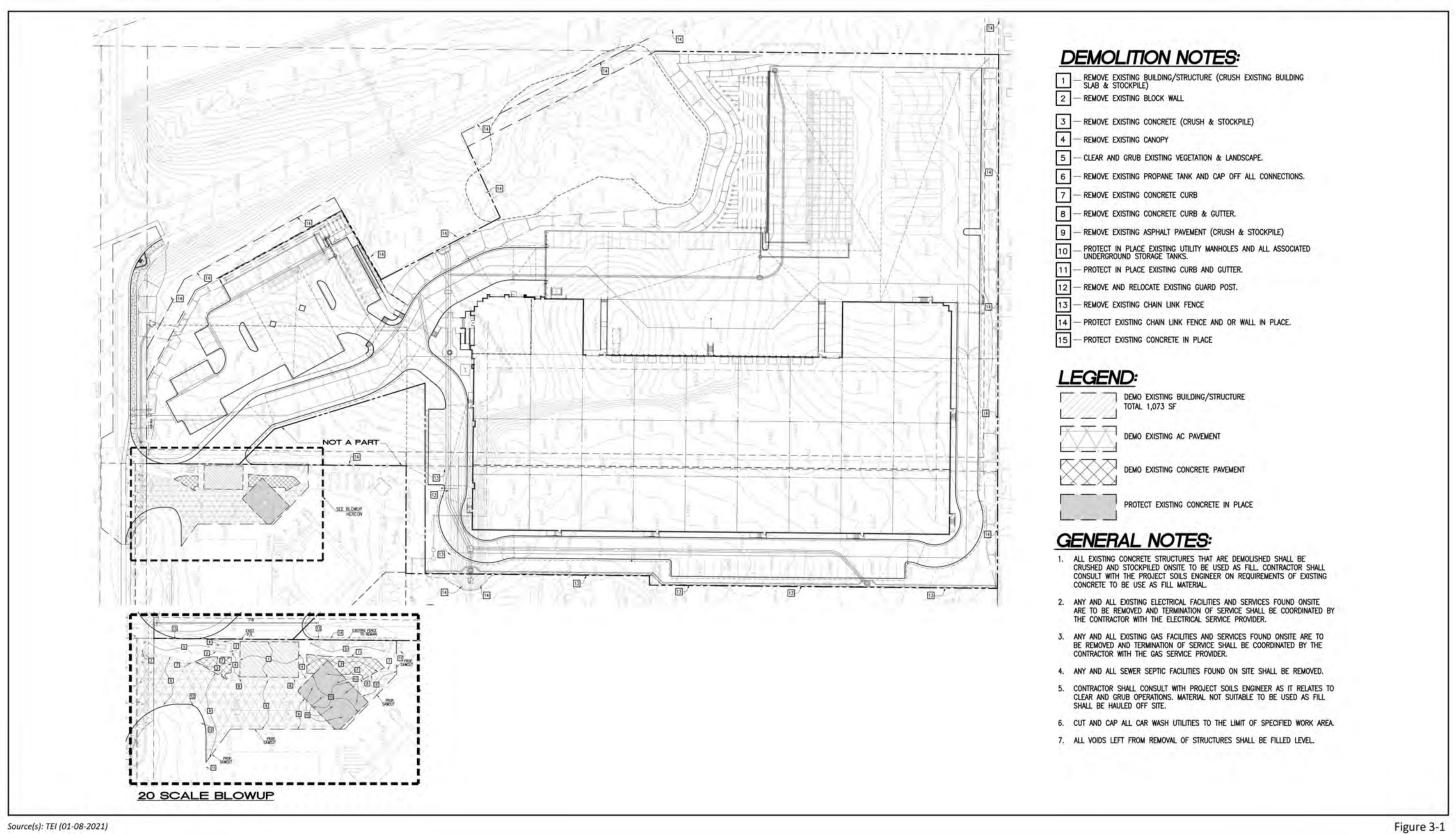
Table 3-1 Anticipated Construction Equipment Assumptions and Duration

DAYS	ACTIVITY	EQUIPMENT	AMOUNT	Hours
				PER
				DAY
10	Demolition/Crushing	Concrete/Industrial Saws	1	8
		Excavators	3	8
		Rubber Tired Dozers	2	8
10	Site Preparation	Crawler Tractors	4	8
		Rubber Tired Dozers	3	8
20	Grading	Crawler Tractors	3	8
		Excavators	1	8
		Graders	1	8
		Rubber Tired Dozers	1	8
230	Building Construction	Cranes	1	8
		Forklifts	3	8
		Generator Sets	1	8
		Tractors/Loaders/Backhoes	3	8
		Welders	1	8
20	Paving	Pavers	2	8
		Paving Equipment	2	8
		Rollers	2	8

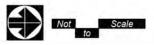
20	Architectural Coating	Air Compressors	1	8	
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(Urban Crossroads, Inc., 2021a)

Planning Case No. PR-2020-000519 Addendum to Mitigated Negative Declaration

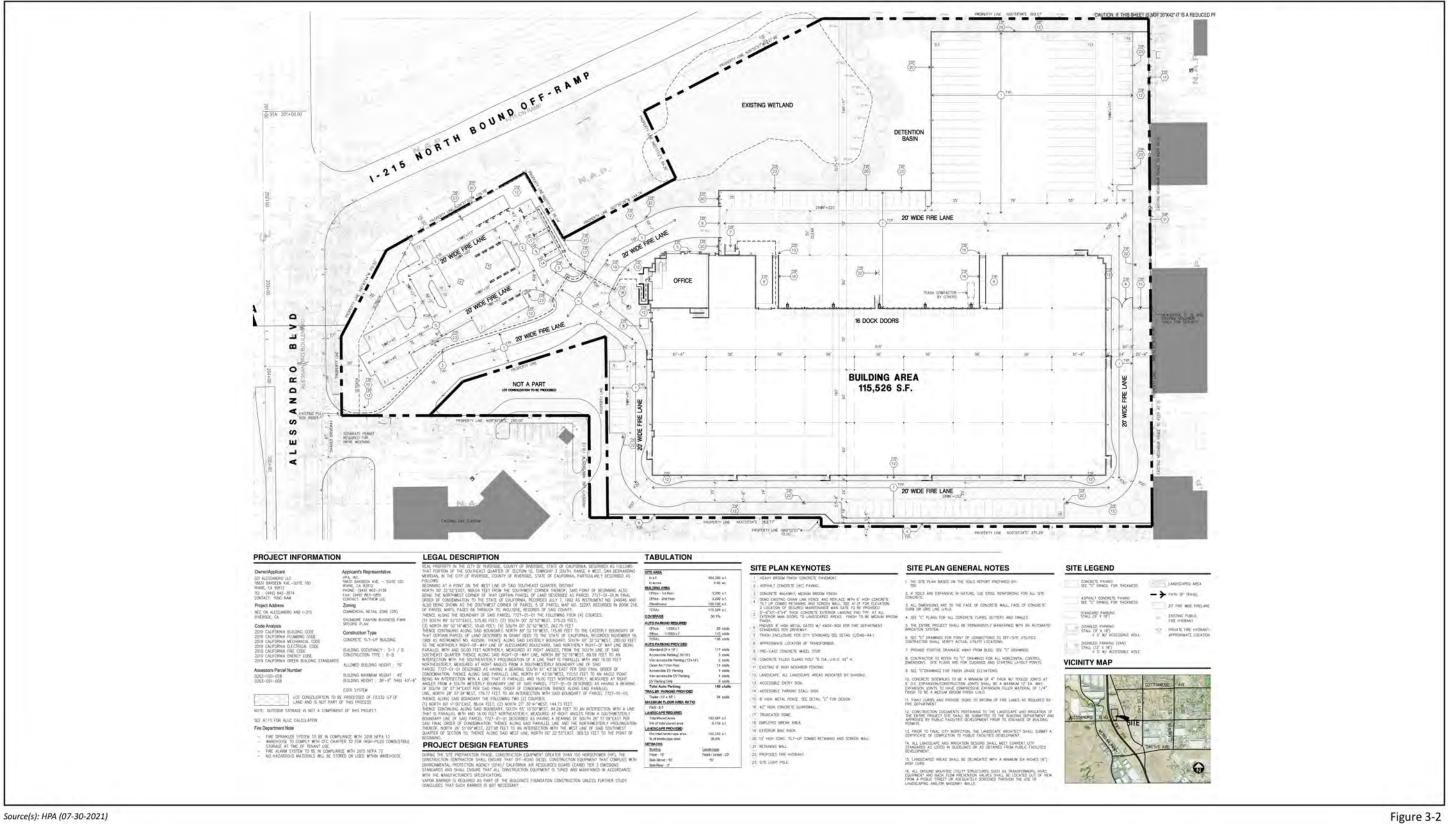


Source(s): TEI (01-08-2021)

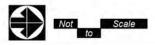


**Demolition Plan** 

Planning Case No. PR-2020-000519 **Addendum to Mitigated Negative Declaration** 

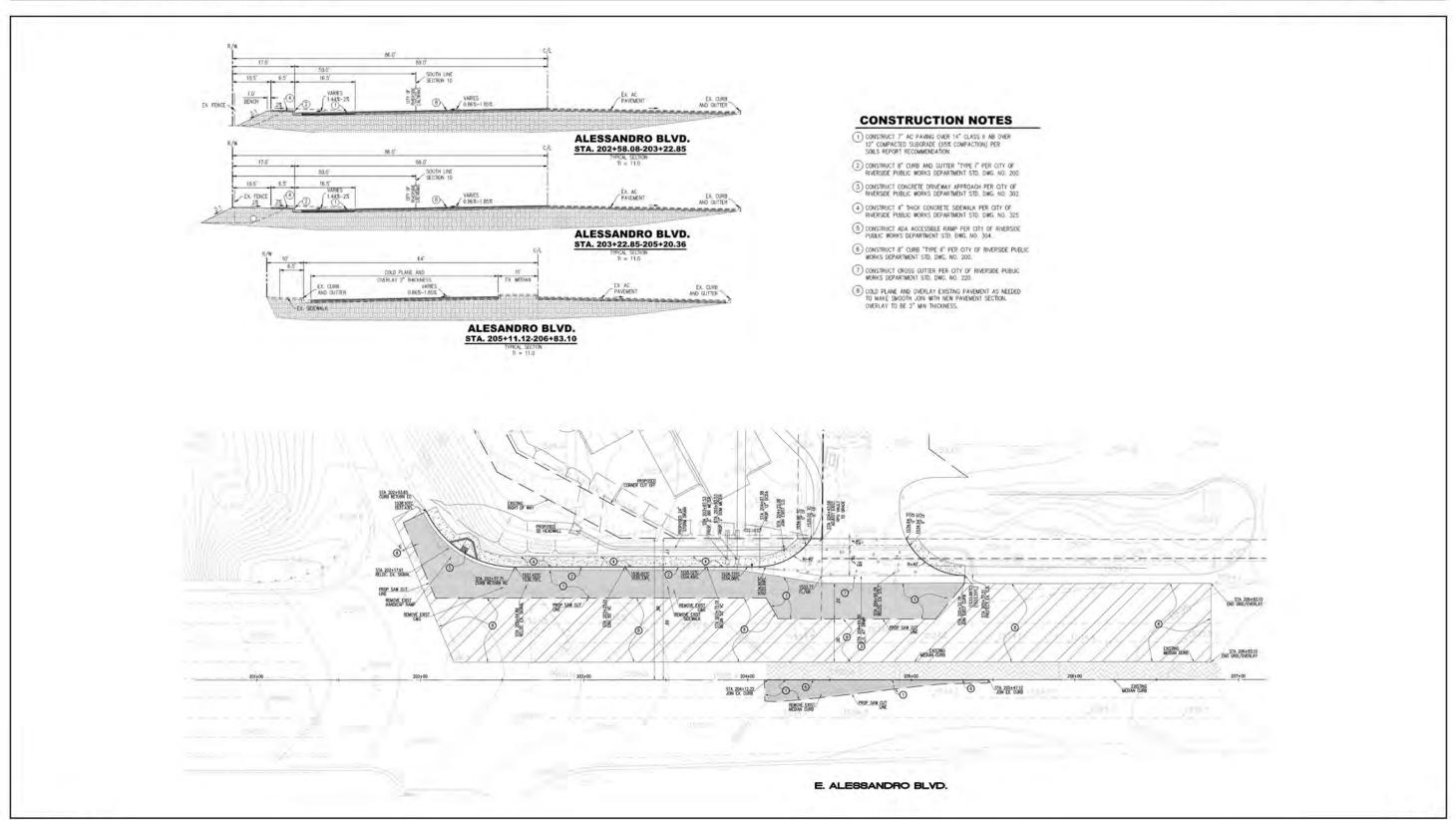


Source(s): HPA (07-30-2021)



**Overall Site Plan** 

Addendum to Mitigated Negative Declaration Planning Case No. PR-2020-000519

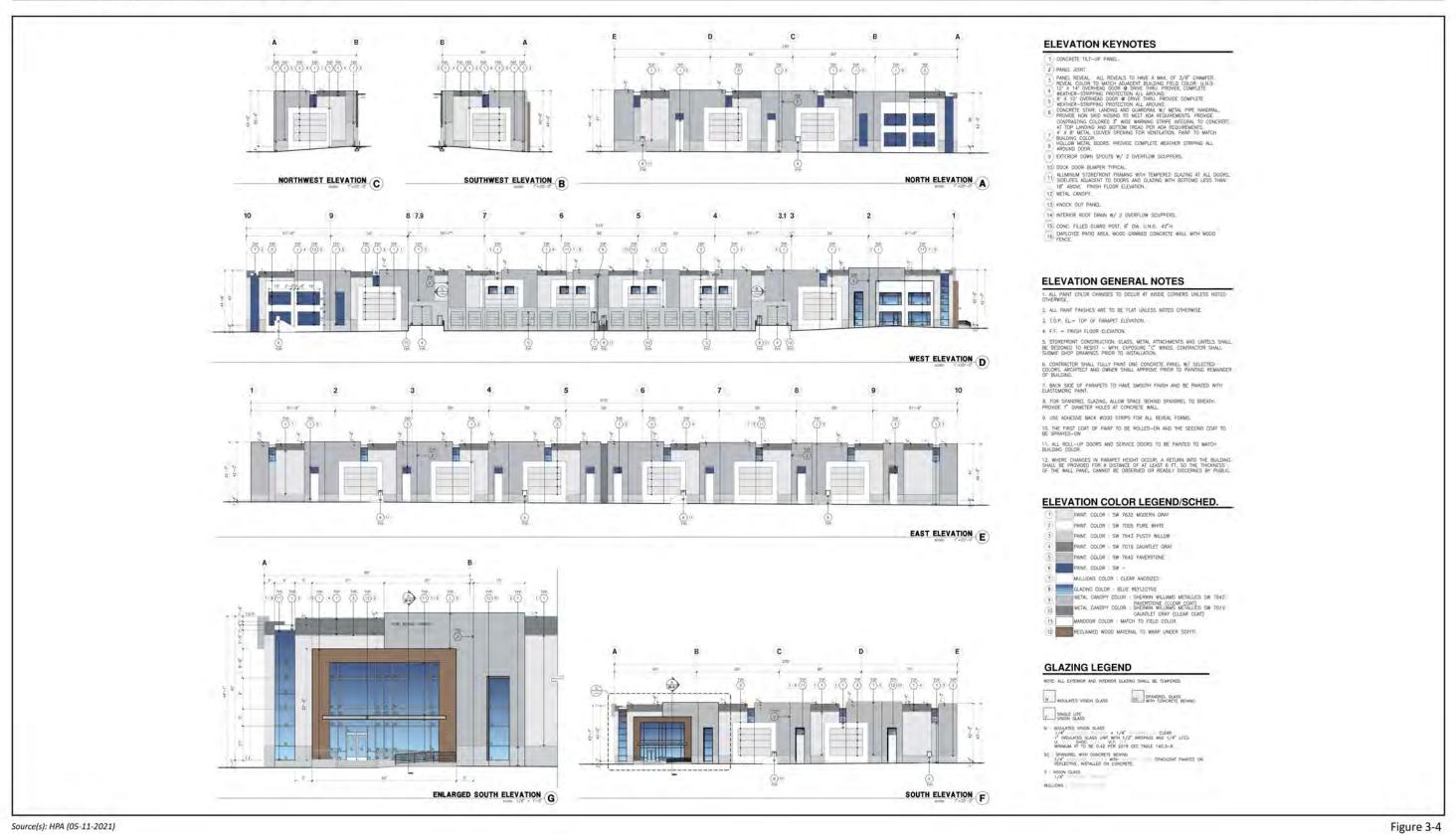


Source(s): TEI (07-30-2021)



Figure 3-3

Planning Case No. PR-2020-000519 Addendum to Mitigated Negative Declaration



Source(s): HPA (05-11-2021)



**Conceptual Architectural Elevations** 

Addendum to Mitigated Negative Declaration Planning Case No. PR-2020-000519

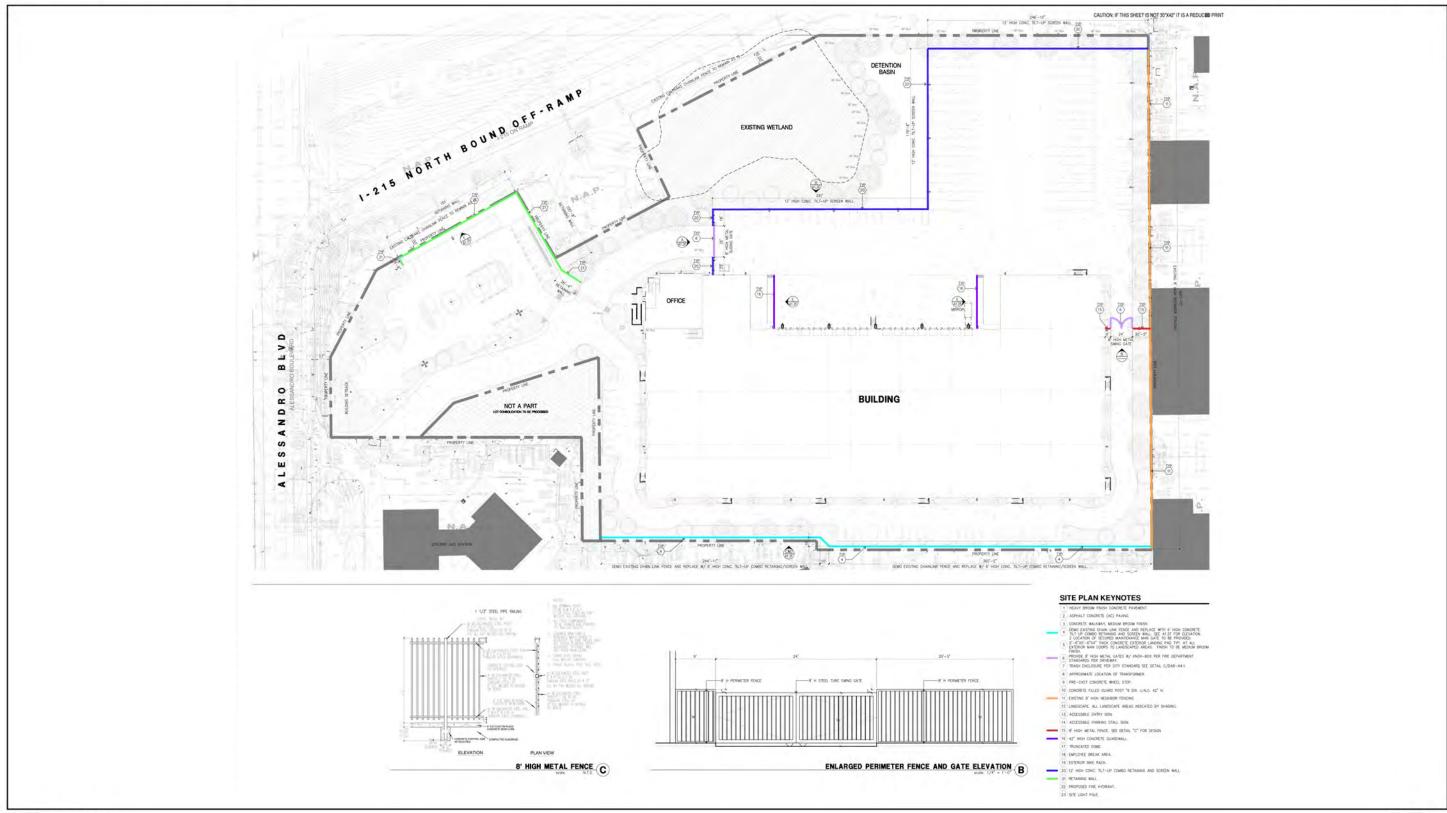
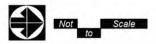


Figure 3-5

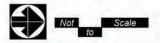


**Fencing Plan** 

Addendum to Mitigated Negative Declaration Planning Case No. PR-2020-000519

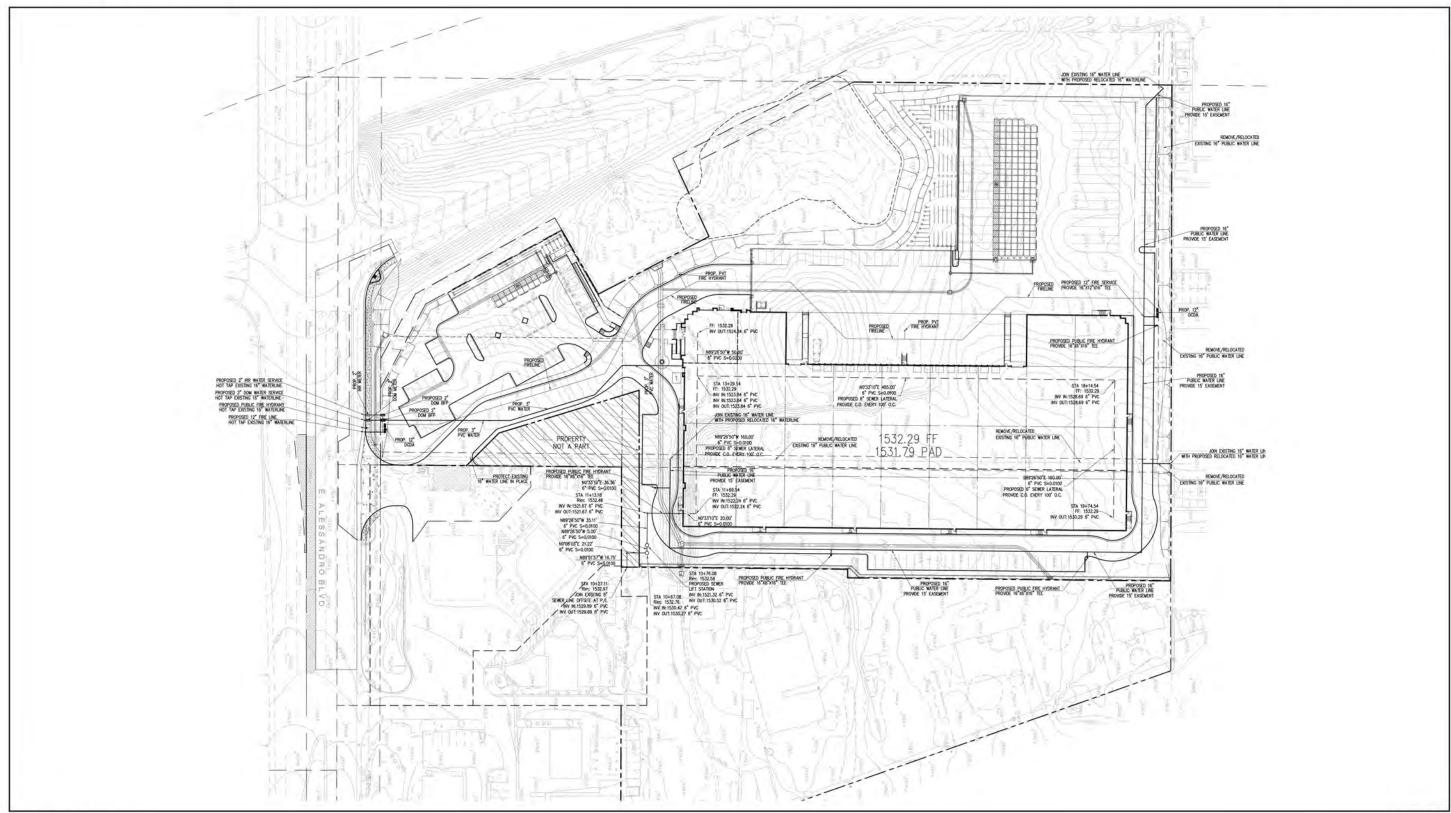


Source(s): Hunter (05-11-2021)

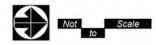


**Conceptual Landscaping Plan** 

Addendum to Mitigated Negative Declaration Planning Case No. PR-2020-000519



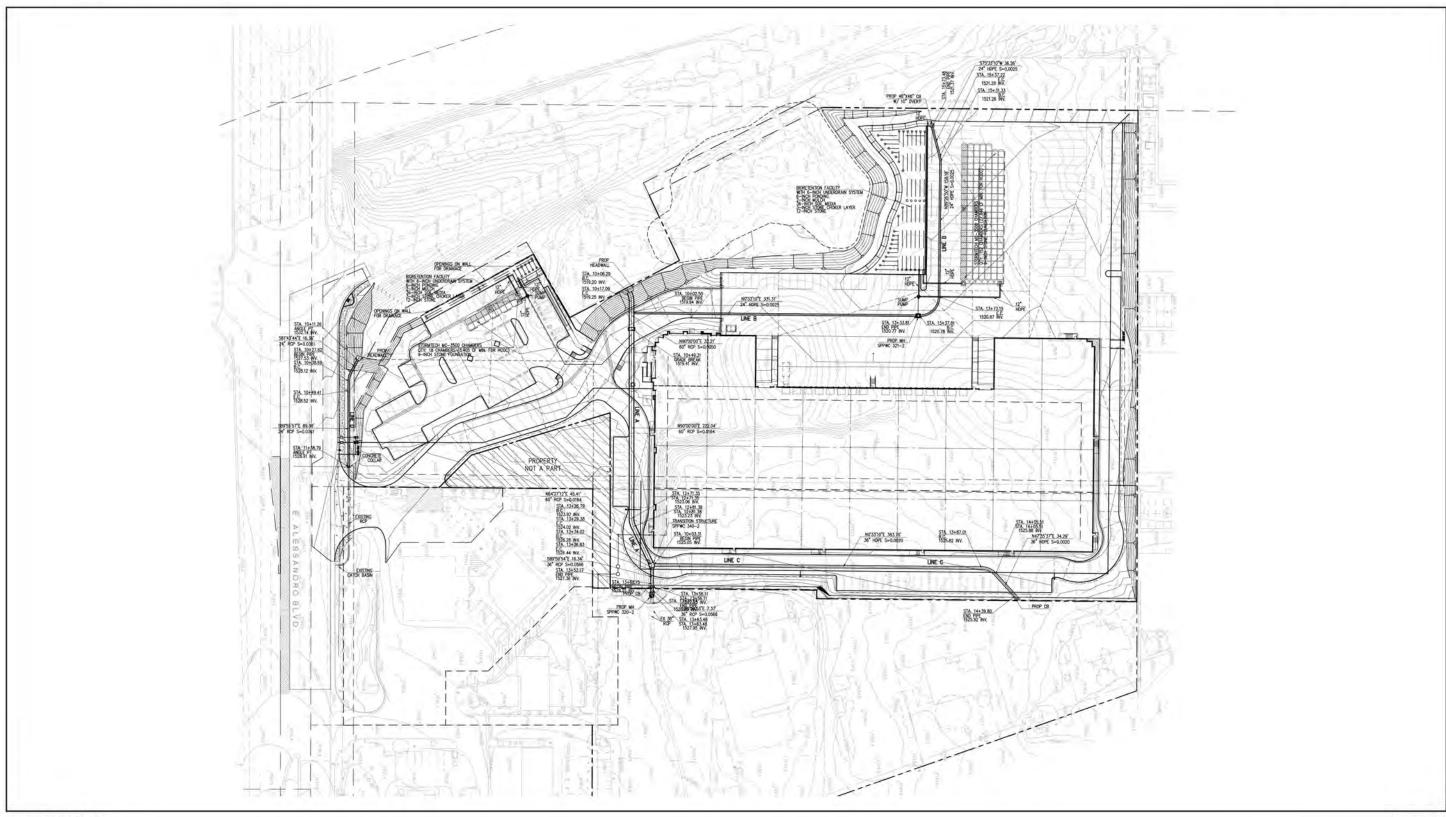
Source(s): TEI (07-30-2021)



**Conceptual Utility Plan** 

Figure 3-7

Addendum to Mitigated Negative Declaration Planning Case No. PR-2020-000519



Source(s): TEI (07-30-2021)

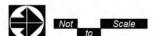


Figure 3-8

**Conceptual Storm Drain Plan** 

## 4.0 Environmental Checklist

## 4.1 Environmental Factors Potentially Affected

Pursuant to Public Resources Code Section 21157.1 (b) and CEQA Guidelines 15177(b)(2), the purpose of this initial study is to analyze whether the current Project (Planning Case No. PR-2020-000519) may cause any additional significant effect on the environment, which was not previously disclosed in the Adopted MND (Case Nos. P14-0841, P14-0842, P14-0843, P14-0844, P14-0846, and P14-0847) that was adopted by the City of Riverside in January 2016. The environmental factors checked below would be potentially affected by the proposed Project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

	Aesthetics		Hazards & Hazardous Materials		Recreation
	Agriculture & Forest Resources		Hydrology/Water Quality		Transportation
	Air Quality		Land Use / Planning		Tribal Cultural Resources
	Biological Resources		Mineral Resources		Utilities/Service Systems
	Cultural Resources		Noise		Wildfire
	Energy		Paleontological Resources		Mandatory Findings of
	Geology/Soils		Population/Housing		Significance
	Greenhouse Gas Emissions		Public Services		
4.2	<u>DETERMINATION</u>				
On	the basis of this initial evaluation:				
ΑP	REVIOUS ENVIRONMENTAL IMPAC	T REI	PORT/NEGATIVE DECLARATION	N WA	S NOT PREPARED:
	I find that the proposed project (	COUL	<b>D NOT</b> have a significant effe	ct on	the environment, and a
	<b>NEGATIVE DECLARATION</b> will be p	repai	red.		
	I find that although the proposed	proie	ect could have a significant effe	ect o	n the environment, there
	will not be a significant effect in	-	_		
	agreed to by the project proponen		·	-	•
_					
Ш	I find that the proposed project		<del>-</del>	on th	ne environment, and an
	ENVIRONMENTAL IMPACT REPOR	T (EIF	R) is required.		
ΑP	REVIOUS ENVIRONMENTAL IMPAC	T REI	PORT/NEGATIVE DECLARATIO	N WA	S PREPARED:
	I find that although the proposed p	rojec	t could have a significant effect	on th	ne environment, <b>NO NEW</b>

T&B Planning, Inc.

**ENVIRONMENTAL DOCUMENTATION IS REQUIRED** because (a) all potentially significant effects of the proposed project have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, (b) all potentially significant effects of the proposed project have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, (c) the proposed project will not result in any new significant environmental effects not identified in the earlier EIR or Negative Declaration, (d) the proposed project will not substantially increase the severity of the environmental effects identified in the earlier EIR or Negative Declaration, (e) no considerably

 Prir	nted Name	
Sign	nature	Date
	I find that at least one of the following conditions de 15162, exist and a <b>SUBSEQUENT ENVIRONMENT</b> , changes are proposed in the project which will requideclaration due to the involvement of new significant in the severity of previously identified significant effects or the circumstances under which the project of the previous EIR or negative declaration due to the effects or a substantial increase in the severity of prinformation of substantial importance, which was not the exercise of reasonable diligence at the time the negative declaration was adopted, shows any the significant effects not discussed in the previous EIR previously examined will be substantially more seed declaration; (C) Mitigation measures or alternatives be feasible, and would substantially reduce one or project proponents decline to adopt the mitigation measures or alternatives which are considerably difference on the project proponents decline to adopt the mitigation measures or alternatives which are considerably difference on the project proponents decline to the project project project project project	AL IMPACT REPORT is required: (1) Substantial re major revisions of the previous EIR or negative at environmental effects or a substantial increase fects; (2) Substantial changes have occurred with at is undertaken which will require major revisions the involvement of new significant environmental reviously identified significant effects; or (3) New not known and could not have been known with the previous EIR was certified as complete or the following: (A) The project will have one or more of or negative declaration; (B) Significant effects were than shown in the previous EIR or negative as previously found not to be feasible would in fact a more significant effects of the project, but the on measures or alternatives; or, (D) Mitigation ferent from those analyzed in the previous EIR or the project on the
	I find that at least one of the conditions described exist, but I further find that only minor additions or adequately apply to the project in the changed <b>ENVIRONMENTAL IMPACT REPORT</b> is required that make the previous EIR adequate for the project as re-	changes are necessary to make the previous EIR situation; therefore, a <b>SUPPLEMENT TO THE</b> need only contain the information necessary to
	I find that although all potentially significant effects or Negative Declaration pursuant to applicable le necessary but none of the conditions described in Ca An <b>ADDENDUM</b> to a previously-certified EIR or Negonsidered by the approving body or bodies.	egal standards, some changes or additions are alifornia Code of Regulations, Section 15162 exist.
	different mitigation measures have been identified have become feasible.	and (f) no mitigation measures found infeasible

# 5.0 Environmental Analysis

# 5.1 ENVIRONMENTAL ISSUES ASSESSMENT

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code §§ 21000-21178.1), this Initial Study (IS) has been prepared to analyze the proposed Project to determine any potential significant impacts upon the environment beyond those disclosed in MND (Case Nos. P14-0841, P14-0842, P14-0843, P14-0844, P14-0846, and P14-0847) that would result from construction and implementation of the Project. In accordance with California Code of Regulations § 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the City of Riverside, in consultation with other jurisdictional agencies, to determine whether a Negative Declaration, Mitigated Negative Declaration (MND), Environmental Impact Report (EIR), or Addendum to an Adopted EIR or MND is required for the proposed Project.

# 5.1.1 Aesthetics

		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
I. AESTH	ETICS. Except as provided in Public Resources Co	de Section 21	1099, would the p	roject:	
a.	Have a substantial adverse effect upon a scenic highway corridor within which it is located?			$\boxtimes$	
b.	Substantially damage scenic resources, including, but not limited to trees, rock outcroppings and historic buildings within a scenic highway?			$\boxtimes$	
C.	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				

## a) Would the Project have a substantial adverse effect on a scenic vista?

(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards and Parkways, Table 5.1-A – Scenic and Special Boulevards, and Table 5.1-B – Scenic Parkways, Sycamore Canyon Business Park Specific Plan)

# No Substantial Change from Previous Analysis:

The Project involves the construction and operation of one 115,526 s.f. warehouse building and associated improvements. To accomplish the Project, the vacant site and the location of an adjacent car wash facility would be developed, which would entail demolition of the car wash structure and its associated improvements.

The Adopted MND concluded that with compliance to and implementation of the Citywide Design Guidelines, impacts to scenic vistas would be less than significant. The proposed Project is consistent in terms of the bulk and scale of the previously entitled industrial building and other physical features. There are no components of the proposed Project that would result in an increased adverse effect on a scenic vista. Consistent with the Adopted MND, the proposed Project would comply with the Citywide Design Guidelines as well as the design guidelines of the Sycamore Canyon Business Park Specific Plan. Therefore, the Project's potential to have a substantial adverse effect on a scenic vista remains less than significant. Thus, the proposed Project would not result in any new impacts not already analyzed in the Adopted MND, and the proposed Project would not increase the severity of a significant impact as identified and analyzed in the Adopted MND. Direct, indirect, and cumulative impacts related to scenic vistas remain less than significant.

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

(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards, Parkways, Table 5.1-A – Scenic and Special Boulevards, Table 5.1-B – Scenic Parkways, the City's Urban Forest Tree Policy Manual, Title 20 – Cultural Resources and, Title 19 – Article V – Chapter 19.100 – Residential Zones - RC Zone, Caltrans State Scenic Highway System Map)

## No Substantial Change from Previous Analysis:

The California Department of Transportation does not identify any state scenic highways in the Project area. There are no components of the proposed Project that would result in an increased adverse effect to substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. The Adopted MND disclosed for informational purposes that the Project site is located along Alessandro Boulevard which is designated as a Scenic Boulevard within the Circulation and Community Mobility Element of the City's General Plan 2025. Consistent with the Adopted MND, the proposed Project would comply with and implement the Citywide Design Guidelines as well as the design guidelines of the Sycamore Canyon Business Park Specific Plan, which would maintain the desired aesthetic along Alessandro Boulevard. The proposed Project would not result in any new impacts not already analyzed in the Adopted MND, and the proposed Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

Because there are no State scenic highways in the Project site's viewshed, impacts would remain less than significant related to State scenic highways.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

(Source: General Plan 2025, General Plan 2025 FPEIR, Zoning Code, Citywide Design and Sign Guidelines, Sycamore Canyon Business Park Specific Plan)

# **No Substantial Change from Previous Analysis:**

The Project site is located in an urbanized area at the Alessandro Boulevard/Interstate 215 interchange. Although the visual character of the site would change from a vacant site to a developed site, there are no components of the proposed Project that would increase potential adverse effects to the existing visual character or quality of public views of the site and its surroundings. In addition, the proposed Project is consistent with all applicable zoning and other regulations governing scenic quality. Consistent with the findings of the Adopted MND, the proposed Project would not damage or substantially degrade the visual character or quality of the site and its surroundings, given that the Project would be compatible with the existing development to the north of the site and the existing zoning north and east of the site; thus, impacts due to the substantial degradation of the existing visual character or quality of public views of the site and its surroundings would remain as less than significant. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

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

# **No Substantial Change from Previous Analysis:**

The Project site is located in an urbanized area at the Alessandro Boulevard/Interstate 215 interchange. Although the visual character of the site would change from a vacant site to a developed site, there are no components of the proposed Project that would increase potential adverse effects to the existing visual character or quality of public views of the site and its surroundings. In addition, the proposed Project is consistent with all applicable zoning and other regulations governing scenic quality. Consistent with the findings of the Adopted MND, the proposed Project would not damage or substantially degrade the visual character or quality of the site and its surroundings, given that the Project would be compatible with the existing development to the north of the site and the existing zoning north and east of the site; thus, impacts due to the substantial degradation of the existing visual character or quality of public views of the site and its surroundings would remain as less than significant. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

# 5.1.2 Agriculture and Forest Resources

	Less than Potentially Significant Significant Impact with Impact Mitigation Incorporated		Less than Significant Impact	No Impact		
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:						
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				$\boxtimes$	
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				$\boxtimes$	
C.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				$\boxtimes$	
d.	Result in the loss of forest land or conversion of forest land to non-forest use?					
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest land?				×	

a) Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

(Source: General Plan 2025 – Figure OS-2 – Agricultural Suitability & General Plan 2025 FPEIR – Appendix I – Designated Farmland Table, FPEIR Section 5.2-Agricultural Resources, Google Earth)

## **No Substantial Change from Previous Analysis:**

The Adopted MND states that according to Figure OS-2 – Agricultural Suitability of the General Plan 2025, the Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The California Department of Conservation does not designate lands within the Project site as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. As such, the Adopted MND concluded that no impact would occur. Since adoption of the Adopted MND, the Project site has not been designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) and there are no components of the proposed Project that would result in impacts to Farmland. Consistent with the Adopted MND, no impact would occur. As such, the proposed Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

b) Would the Project conflict with existing zoning for agricultural use or Williamson Act contract?

(Source: General Plan 2025 – Figure OS-3 - Williamson Act Preserves, General Plan 2025 FPEIR – Figure 5.2-4 – Proposed Zones Permitting Agricultural Uses, and Title 19)

# **No Substantial Change from Previous Analysis:**

The Adopted MND states that according to Figure 5.2-2 – Williamson Act Preserves of the General Plan 2025 FPEIR, the Project site is not located within an area that is affected by a Williamson Act Preserve or under a Williamson Act Contract. The site is also not zoned for agricultural land. Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. Consistent with the Adopted MND, no impact would occur. As such, the proposed Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

c) Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

(Source: Figure LU-10 – Land Use Policy Map, General Plan 2025, City of Riverside Zoning Map, Sycamore Canyon Business Park Specific Plan, Google Earth)

## **No Substantial Change from Previous Analysis:**

Consistent with the conditions that existed with the Adopted MND, the Project site does not contain any forest lands, timberland, or timberland zoned as Timberland Production, nor are any forest lands or timberlands located on or nearby the Project site. No impact would occur. Therefore, consistent with the findings of the Adopted MND, the Project would not conflict with zoning for forests or Timberland Production. Consistent with the Adopted MND, no impact would occur. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND

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

(Source: GIS Map – Forest Data, General Plan 2025-Figure OS-2-Agricultural Suitability, Google Earth)

# **No Substantial Change from Previous Analysis:**

Consistent with the conditions that existed with the Adopted MND, the Project site does not contain any forest lands. No impact would occur. Therefore, consistent with the findings of the Adopted MND, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. Consistent with the Adopted MND, no impact would occur. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

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

(Source: General Plan – Figure OS-2 – Agricultural Suitability, Figure OS-3 – Williamson Act Preserves, General Plan 2025 FPEIR – Appendix I – Designated Farmland Table, Title 19 – Article V – Chapter 19.100 – Residential Zones – RC Zone and RA-5 Zone and GIS Map – Forest Data)

# No Substantial Change from Previous Analysis:

Consistent with the conditions that existed with the Adopted MND, based on the analysis under Thresholds (a) through (d) above, no impacts would occur with respect to changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use and no mitigation measures are required. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

## 5.1.3 Air Quality

		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact			
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:								
a.	Conflict with or obstruct implementation of the applicable air quality plan?			$\boxtimes$				
b.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an		×					

		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
	applicable federal or state ambient air quality standard?				
C.	Expose sensitive receptors to substantial pollutant concentrations?			$\boxtimes$	
d.	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			$\boxtimes$	

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

(Source: South Coast Air Quality Management District's 2007 and 2016 Air Quality Management Plan (AQMP), Air Quality Impact Analysis prepared by Urban Crossroads, Inc. on October 26, 2021)

# **No Substantial Change from Previous Analysis:**

The Project involves the construction and operation of one 115,526 s.f. warehouse building and associated improvements. To accomplish the Project, the vacant site and the location of an adjacent car wash facility would be developed, which would entail demolition of the car wash structure and its associated improvements. The proposed Project would not develop or disturb any additional property that was not assumed to be developed by the Adopted MND and the proposed Project's construction equipment and construction duration would be similar to the Project that was evaluated by the Adopted MND. The operational characteristics associated with the proposed warehouse use (e.g., traffic and traffic-related impacts) are less intensive than the commercial and industrial land uses evaluated for the Project site as part of the Adopted MND.

The Adopted MND concluded that because the Project was consistent with the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the General Plan 2025 "Typical Growth Scenario," it is also consistent with the Air Quality Management Plan (AQMP); therefore, impacts were determined to be less than significant. Although the Project entails a General Plan Amendment, the resulting land use proposed would result in fewer air pollutant emissions that were assumed for the existing land use designation. In 2021, Urban Crossroads conducted an Air Quality Impact Analysis for the proposed Project. As discussed below in Threshold (b), the proposed Project would result in emissions of criteria pollutants that are well below what was assumed for the Project site by the Adopted MND. The proposed Project also would be subject to all applicable regulatory requirements addressing air pollution, as well as the mitigation measures included in the Adopted MND to further reduce potential air pollutant emissions. In addition, the SCAQMD adopted an Indirect Source Rule (ISR) in 2021, which is intended to address air quality concerns associated

with warehouse development across the South Coast Air Basin. There are no components of the proposed Project that would result in a conflict with or that would obstruct implementation of the air quality attainment plans and impacts would therefore remain less than significant. Therefore, the proposed Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

b) Would the proposed 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?

(Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2007 and 2016 AQMP, Air Quality Analysis prepared by Yorke Engineering, LLC on March 2015, Air Quality Analysis prepared by Urban Crossroads, Inc. on October 26, 2021)

MM Air 1: To reduce diesel emissions associated with construction, construction contractors shall provide temporary electricity to eliminate the need for diesel powered generators, or provide evidence that electrical hook ups at construction sites are not cost effective or feasible.

MM Air 2: To reduce construction related particulate matter air quality impacts of City projects the following measures shall be required:

- 1. The generation of dust shall be controlled as required by the AQMD;
- Grading activities shall cease during period of high winds (greater than 25 mph);
- 3. Trucks hauling soil, dirt or other emissive materials shall have their loads covered with a tarp or other protective cover as determined by the City Engineer; and
- 4. The contractor shall prepare and maintain a traffic control plan, prepared, stamped and signed by either a licensed Traffic Engineer or a Civil Engineer. The preparation of the plan shall be in accordance with Chapter 5 of the latest edition of the Caltrans Traffic Manual and the State Standard Specifications. The plan shall be submitted for approval, by the engineer, at the preconstruction meeting. Work shall not commence without an approval traffic control plan.

# **No Substantial Change from Previous Analysis:**

The Adopted MND concluded that air pollutant emissions (short-term and long-term) would not exceed the SCAQMD daily significance thresholds. The SCAQMD is the entity charged with bringing the South Coast Air Basin into State and federal attainment status and the SCAQMD's significance thresholds standardize the review of projects across the Air Basin. To ensure short term emissions are further reduced, the General Plan 2025 Program EIR's mitigation measures were applied to the Project, MM Air 1 and MM Air 2.

## Impact Analysis for Construction Emissions

During construction of the proposed Project, the construction activities and equipment fleet is expected to be similar to the fleet assumed in the Adopted MND, although likely less polluting due to the

replacement of older equipment with newer, less polluting equipment in most standard fleets over time. As shown on Table 5-1, *Overall Construction Emissions Summary (Without Mitigation)* emissions resulting from the Project construction would not exceed criteria pollutant thresholds established by the SCAQMD for emissions of any criteria pollutant. (Urban Crossroads, 2021a, p. 41) Although mitigation is not needed to reduce estimated daily construction regional emissions, the proposed Project would implement MM Air 1 and MM Air -2 consistent with the Adopted MND.

Emissions (lbs/day) Year VOC NOx CO SOx PM<sub>10</sub> PM<sub>2.5</sub> Summer 2021 5.43 61.02 24.42 0.06 14.04 6.81 0.06 2022 49.59 21.35 2.99 23.67 1.39 Winter 2021 5.43 61.02 23.41 0.06 14.04 6.81 2022 49.59 21.32 22.74 0.06 2.99 1.39 **Maximum Daily Emissions** 49.59 61.02 24.42 0.06 14.04 6.81 SCAQMD Regional Threshold 75 100 550 150 150 55 Threshold Exceeded? NO NO NO NO NO NO

Table 5-1 Overall Construction Emissions Summary (Without Mitigation)

(Urban Crossroads, Inc., 2021a, Table 3-5)

#### Impact Analysis for Operational Emissions

As shown in Table 5-2, *Summary of Peak Operational Emissions*, the proposed Project's daily regional emissions from ongoing operations would not exceed any of the SCAQMD's thresholds of significance. Therefore, with respect to operational emissions, as shown in Table 5-3, *Operational Emissions Comparison*, the proposed Project is calculated to generate fewer emissions per day for pollutants as compared to emissions generated by the project that was approved under the Adopted MND. (Urban Crossroads, Inc., 2021a, pp. 44-45)

Consistent with the Adopted MND, the proposed Project would be required to comply with all applicable SCAQMD Rules, as well as the applicable mitigation measures (MM Air 1 and MM Air 2). Consistent with the Adopted MND, the Project would not result in an exceedance of any regional construction or operational-source emission thresholds. (Urban Crossroads, Inc., 2021a, p. 3)

Consistent with the findings of the Adopted MND, the proposed Project would not 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, and impacts would be less than significant. The proposed Project also would be subject to all applicable regulatory requirements addressing air pollution reduction. Therefore, the Project would not result in any new impacts not already analyzed in

the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed Adopted MND.

Table 5-2 Summary of Peak Operational Emissions

		Emissions (lbs/day)						
Source	voc	NO <sub>X</sub>	со	SO <sub>X</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>		
	9	Summer						
Area Source	2.66	5.00E-04	0.05	0.00	1.90E-04	1.90E-04		
Energy Source	4.88E-03	0.04	0.04	2.70E-04	3.37E-03	3.37E-03		
Mobile Source	0.69	11.51	6.59	0.06	3.41	1.04		
On-Site Equipment Source	0.12	1.27	0.76	3.17E-03	0.04	0.04		
Total Maximum Daily Emissions	3.48	12.82	7.44	0.07	3.45	1.09		
SCAQMD Regional Threshold	55	55	550	150	150	55		
Threshold Exceeded?	NO	NO	NO	NO	NO	NO		
		Winter						
Area Source	2.66	5.00E-04	0.05	0.00	1.90E-04	1.90E-04		
Energy Source	4.88E-03	0.04	0.04	2.70E-04	3.37E-03	3.37E-03		
Mobile Source	0.67	11.99	5.83	0.06	3.40	1.04		
On-Site Equipment Source	0.12	1.27	0.76	3.17E-03	0.04	0.04		
Total Maximum Daily Emissions	3.46	13.30	6.68	0.07	3.45	1.09		
SCAQMD Regional Threshold	55	55	550	150	150	55		
Threshold Exceeded?	NO	NO	NO	NO	NO	NO		

(Urban Crossroads, Inc., 2021a, Table 3-8)

Table 5-3 Operational Emissions Comparison

Source		Emissions (lbs/day)						
	voc	NOx	со	SO <sub>X</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>		
Approved Project (Max. Daily) <sup>9</sup>	24.70	30.40	113.60	0.27	17.40	5.00		
Proposed Project (Max. Daily) <sup>10</sup>	3.48	13.30	7.44	0.07	3.45	1.09		
Difference (Proposed –Approved)	-21.22	-17.10	-106.16	-0.20	-13.95	-3.91		

(Urban Crossroads, Inc., 2021a, Table 3-10)

# c) Would the proposed Project expose sensitive receptors to substantial pollutant concentrations?

(Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2007 and 2016 Air Quality Management Plan, Air Quality Analysis prepared by Yorke Engineering, LLC on March 2015, Air Quality Analysis prepared by Urban Crossroads,

Inc. on October 26, 2021, Mobile Source Health Risk Assessment prepared by Urban Crossroads, Inc. on October 22, 2021)

## **No Substantial Change from Previous Analysis:**

The Adopted MND did not identify any potential impacts due to the exposure of sensitive receptors to substantial pollutant concentrations. Although not required for comparative analysis to the Adopted MND, a Mobile Source Health Risk Assessment was prepared for the current Project.

## <u>Impact Analysis for Construction Localized Emissions</u>

Localized Significance Thresholds (LSTs) represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard at the nearest residence or sensitive receptor. SCAQMD recommends that the newest sensitive receptor be considered when determining the Project's potential to cause an individual or cumulatively significant impact.

Table 5-4, Localized Construction-Source Emissions -Without Mitigation, identifies the localized impacts at the nearest receptor to the Project site. As shown, localized construction emissions would not exceed the applicable SCAQMD LSTs for emissions of any criteria pollutant. (Urban Crossroads, Inc., 2021a, p. 53)

# Impact Analysis for Operational Localized Emissions

As shown in Table 5-5, Localized Significance Summary of Operations - Without Mitigation, operational emissions for the proposed Project would not exceed the LST thresholds for the nearest sensitive receptor. Therefore, the proposed Project would have a less than significant localized impact during operational activity. (Urban Crossroads, Inc., 2021a, pp. 44, 52, 58)

# <u>Impact Analysis for Diesel Particulate Emissions</u>

Similar to the project described in the Adopted MND, diesel-fueled trucks would travel to/from the Project site during operation of the Project. Diesel trucks produce diesel particulate matter (DPM), which is known to be associated with health hazards, including cancer. To evaluate the Project's potential to expose sensitive receptors within 0.25 mile of the Project site and the Project's primary travel routes to substantial amounts of DPM during long-term operation, a Mobile Source Health Risk Assessment (HRA) was prepared for the proposed Project. On-site truck idling was calculated by Urban Crossroads to occur as trucks enter and travel through the Project site. Although the Project's diesel-fueled truck and equipment operators are required by State law to comply with CARB's idling limit of 5 minutes, staff at SCAQMD recommends that the on-site idling emissions be calculated assuming 15 minutes of truck idling, which would take into account on-site idling which occurs while the trucks are waiting to pull up to the truck bays, idling at the bays, idling at check-in and check-out, etc. As such, the Project's HRA (*Technical Appendix L*), analyzed truck idling at 15 minutes, consistent with SCAQMD's recommendation. (Urban Crossroads, Inc., 2021a, pp. 14-15)

Table 5-4 Localized Construction-Source Emissions -Without Mitigation

On-Site Emissions		Emissions (lbs/day)				
On-Site Emissions	NO <sub>x</sub>	со	PM <sub>10</sub>	PM <sub>2.5</sub>		
	Demolition			·A.<		
Maximum Daily Emissions	31.44	21.56	1.55	1.45		
SCAQMD Localized Threshold	270	1,577	13	8		
Threshold Exceeded?	NO	NO	NO	NO		
Site	e Preparation	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,				
Maximum Daily Emissions	37.81	26.94	12.70	5.77		
SCAQMD Localized Threshold	270	1,577	13	8		
Threshold Exceeded?	NO	NO	NO	NO		
	Grading					
Maximum Daily Emissions	39.95	16.38	8.10	3.22		
SCAQMD Localized Threshold	270	1,577	13	8		
Threshold Exceeded?	NO	NO	NO	NO		
Buildi	ng Construction		-, 	3.5		
Maximum Daily Emissions	18.75	17.67	1.03	0.96		
SCAQMD Localized Threshold	270	1,577	13	8		
Threshold Exceeded?	NO	NO	NO	NO		
	Paving					
Maximum Daily Emissions	11.12	14.58	0.57	0.52		
SCAQMD Localized Threshold	270	1,577	13	8		
Threshold Exceeded?	NO	NO	NO	NO		
Archi	tectural Coating					
Maximum Daily Emissions	1.88	2.42	0.11	0.11		
SCAQMD Localized Threshold	270	1,577	13	8		
Threshold Exceeded?	NO	NO	NO	NO		

Source: CalEEMod localized construction-source emissions are presented in Appendix 3.1.

(Urban Crossroads, Inc., 2021a, Table 3-12)

Emissions (lbs/day) On-Site Emissions PM<sub>2.5</sub> NOx co PM<sub>10</sub> **Maximum Daily Emissions** 1.91 1.18 0.22 0.10 SCAQMD Localized Threshold 270 1,577 2 NO NO NO Threshold Exceeded? NO

Table 5-5 Localized Significance Summary of Operations - Without Mitigation

Source: CalEEMod localized operational-source emissions are presented in Appendix 3.2.

(Urban Crossroads, Inc., 2021a, Table 3-14)

## Operational-Related DPM Impacts

Residential Exposure Scenario: The residential land use with the greatest potential exposure to Project DPM source emissions is located approximately 61 feet east of the Project site at an existing residence. At the MEIR, the maximum incremental cancer risk attributable to Project DPM source emissions is estimated at 0.50 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled residential receptors are exposed to lesser concentrations and are located at a greater distance from the Project site and primary truck route than the MEIR analyzed herein, and TACs generally dissipate with distance from the source, all other residential receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the Project would not cause a significant human health or cancer risk to nearby residences. (Urban Crossroads, Inc., 2021a, p. 21)

Worker Exposure Scenario: The worker receptor land use with the greatest potential exposure to Project DPM source emissions is the adjacent potential worker receptor located 10 feet north of the Project site. At the maximally exposed individual worker (MEIW) receptor, the maximum incremental cancer risk impact is 0.28 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled worker receptors are located at a greater distance than the MEIW analyze herein, and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the Project would not cause a significant human health or cancer risk to adjacent workers. (Urban Crossroads, Inc., 2021a, pp. 21-22)

School Child Exposure Scenario: There are no schools located within a ¼ mile of the Project site. As such, there would be no significant impacts that would occur to any schools in the vicinity of the Project. (Urban Crossroads, Inc., 2021a, p. 22)

In summary, the land use with the greatest potential exposure to Project construction and operational DPM source emissions is located approximately 67 feet east of the Project site at an existing residence. At the MEIR, the maximum incremental cancer risk attributable to Project construction and operational DPM source emissions is estimated at 6.94 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be  $\leq$  0.01, which would not exceed the applicable threshold of 1.0. As such, the Project would not cause a significant human health or cancer risk

to adjacent land uses as a result of Project construction and operational activity. All other receptors during construction activity would experience less risk than what is identified for this location. Consistent with the adopted MND, there are no potential impacts due to the exposure of sensitive receptors to substantial pollutant concentrations. The proposed Project also would be subject to all applicable regulatory requirements addressing air pollution reduction. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed Adopted MND. (Urban Crossroads, Inc., 2021a, p. 22)

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

(Source: Air Quality Analysis prepared by Yorke Engineering, LLC on March 2015, Air Quality Analysis prepared by Urban Crossroads, Inc. on October 26, 2021, General Plan 2025 FPEIR Table 5.3-B SCAQMD Regional Significance Thresholds)

# **No Substantial Change from Previous Analysis:**

The Adopted MND concluded that the Project's potential to result in other emissions (such as those leading to odors) adversely affecting a substantial number of people would be less than significant. The MND concluded that such odors would occur only during daylight hours, be short-term in duration, and would be isolated to the immediate vicinity of the construction site and therefore, would not expose a substantial number of people to objectionable odors on a permanent basis.

Consistent with the project evaluated in the Adopted MND, the proposed Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project's construction and operation activities would remain less than significant and no mitigation is required. Therefore, the Project would not result in any new impacts not already analyzed in Adopted MND and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

# 5.1.4 Biological Resources

		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
IV. BIOLO	OGICAL RESOURCES. Would the project:				
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				
C.	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			$\boxtimes$	
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			$\boxtimes$	
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				$\boxtimes$
a.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				$\boxtimes$

a) Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in

local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

(Source: General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, Habitat Assessment prepared by ICF on August 2014, Determination of Biological Equivalent or Superior Preservation Analysis dated October 8, 2018, Email from Amir Morales on February 11, 2019, Helix Environmental Planning, Inc.)

## **No Substantial Change from Previous Analysis:**

The proposed Project is consistent with the project described in the Adopted MND in terms of physical disturbance area. Specifically, the proposed Project would not develop or disturb any additional property that was not assumed to be developed by the Adopted MND. Through compliance with the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP), the Adopted MND concluded that impacts to any species as a candidate, sensitive, or special status species identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game (CDFW) or U.S. Fish and Wildlife Services (USFWS) would be less than significant.

As discussed below in Threshold (b), Project construction requires permanent impact to 0.01 acre (336 linear feet) of one ephemeral USACE/RWQCB jurisdictional feature (Drainage A) and permanent impacts to 0.055 acre of ephemeral CDFW jurisdictional streambed/MSHCP Riverine Areas. Thus, the Project would unavoidably and adversely impact Riverine Wetland. To compensate for the loss of Riverine Wetland, pursuant to the Riverside Mitigation Bank Agreement for Sale of Credit, dated May 14, 2020, the Project Sponsor purchased rehabilitation credits to offset impacts to 0.055 acre of MSHCP Riparian Areas.

Consistent with the Adopted MND, through compliance with MSHCP Section 6.1.2 and other applicable requirements, impacts to any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS, impacts would remain less than significant. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

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

(Source: General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria

Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, Habitat Assessment prepared by ICF on August 2014, Determination of Biologically Equivalent or Superior Preservation Analysis, prepared on October 8, 2019, Email from Amir Morales on February 11, 2019, Helix Environmental Planning, Inc to Sean Kelleher, City of Riverside, Riverpark Mitigation Bank Agreement for Sale of Credits, dated May 14, 2020))

# **No Substantial Change from Previous Analysis:**

The Adopted MND concluded that through compliance with MSHCP Section 6.1.2 and other applicable requirements, impacts to any riparian habitat or other sensitive natural community identified in local or reginal plans, policies, or regulations by the Department of Fish and Game or U.S. Fish and Wildlife Service would be less than significant.

As part of the Project's Substantial Conformance process, in 2018, a Determination of Biologically Equivalent or Superior Preservation (DBESP) Analysis was prepared by Helix Environmental Planning, Inc. Project construction requires permanent impact to 0.01 acre (336 linear feet) of one ephemeral USACE/RWQCB jurisdictional feature (Drainage A) and permanent impacts to 0.055 acre of ephemeral CDFW jurisdictional streambed/MSHCP Riverine Areas. Thus, the Project would unavoidably and adversely impact Riverine Wetland. To compensate for the loss of Riverine Wetland, pursuant to the Riverside Mitigation Bank Agreement for Sale of Credit, dated May 14, 2020, the Project Sponsor purchased rehabilitation credits to offset impacts to 0.055 acre of MSHCP Riparian Areas.

Consistent with the Adopted MND, through compliance with MSHCP Section 6.1.2 and other applicable requirements, impacts to any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS, impacts would remain less than significant. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

c) Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

(Source: City of Riverside GIS/CADME USGS Quad Map Layer, and Wetlands Delineation, Determination of Biological Equivalent or Superior Preservation Analysis dated October 8, 2018, Department of Fish and Wildlife Notification of Lake or Streambed Alteration No. 1600-2018-0067-R6 dated July 24, 2018, Email from Amir Morales on February 11, 2019, Helix Environmental Planning, Inc., Department of the Army Nationwide Permit (NWP) Verification dated August 15, 2019)

# **No Substantial Change from Previous Analysis:**

As concluded by the Adopted MND, the project originally encroached into a drainage course and/or wetland under the jurisdiction of the United States Army Corps of Engineers (USACOE). State and federal laws and regulations were implemented to protect resources from development through the USACOE

Section 404 permitting process, the California Wetlands Conservation Policy (CWCO), and with applicable MSHCP policies. With required compliance with the applicable local, State and federal laws and regulations, the MSHCP, and the "no net wetland loss" policy, impacts were concluded to be less than significant.

Pursuant to the Department of Fish and Wildlife Service Notification of Lake or Streambed Alteration No. 1600-2018-0067-R6, dated July 24, 2018, a 0.28-acre wetland and an approximate 30-foot buffer surrounding the wetland, located within the remaining 0.60-acre area at the western property boundary will be permanently avoided. In addition, the Project would comply with the Nationwide Permit (NWP) issued for the proposed Project.

Because the Project Applicant complied with the Lake or Streambed Alteration Agreement and obtained an NWP and the Project's design avoids the wetland, consistent with the Adopted MND, the Project's potential to have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means, would remain less than significant. Therefore, the proposed Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

d) Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species with established native resident or migratory corridors, or impeded the use of native wildlife nursery sites?

(Source: MSHCP, General Plan 2025 –Figure OS-7 – MSHCP Cores and Linkage and Habitat Assessment prepared by ICF on August 2014, Email from Amir Morales on February 11, 2019)

# No Substantial Change from Previous Analysis:

As concluded by the Adopted MND, the proposed Project would have no impact on the movement of migratory fish or wildlife species or on established wildlife corridors or wildlife nursery sites. Step I and Step II burrowing owl (BUOW) surveys were conducted by ESA PCR between July 15 and August 30, 2016 pursuant to the County's protocol. Suitable habitat was observed on the Project site; however, no BUOW or BUOW sign were observed during the Step II surveys. A 30-day pre-construction survey is required prior to ground disturbance. Consistent with the Adopted MND, impacts would remain less than significant. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

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

(Source: MSHCP, Title 16 Section 16.72.040 – Establishing the Western Riverside County MSHCP Mitigation Fee, Title 16 Section 16.40.040 – Establishing a Threatened and Endangered Species Fees, City of Riverside Urban Forest Tree Policy Manual, and Habitat Assessment prepared by ICF on August 2014)

## **No Substantial Change from Previous Analysis:**

As evaluated in the Adopted MND, the proposed Project is subject to all applicable federal, State, and local policies and regulations related to the protection of biological resources and tree preservation. In addition, the project is required to comply with Riverside Municipal Code Section 16.72.040 establishing the MSHCP mitigation fee and Section 16.40.040 establishing the Threatened and Endangered Species Fees. In addition, as with any project in the City of Riverside that proposes planting a tree within a City right-of-way, the Project would be in compliance with the City's Urban Forest Tree Policy Manual.

Consistent with the conclusion reached in the Adopted MND, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance due to mandatory compliance with the above policies and regulations. Consistent with the Adopted MND, impacts would remain less than significant. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

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

(Source: MSHCP, General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Stephens' Kangaroo Rat Habitat Conservation Plan, Lake Mathews Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan, and El Sobrante Landfill Habitat Conservation Plan)

## No Substantial Change from Previous Analysis:

As evaluated in the Adopted MND, the Project site is located within the Western Riverside MSHCP and would therefore be required to comply with the requirements of the Western Riverside MSHCP. Consistent with the findings of the Adopted MND, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan because of mandatory compliance to the Western Riverside MSHCP. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

#### 5.1.5 Cultural Resources

		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact			
V. CULTURAL RESOURCES. Would the project:								
a.	Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?		$\boxtimes$					
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?							
C.	Disturb any human remains, including those interred outside of formal cemeteries?			$\boxtimes$				

# a) Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

(Source: GP 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas and Appendix D, Title 20 of the Riverside Municipal Code, Cultural Resources Survey prepared by Power Engineers on May 2015, Cultural Resource Survey prepared by Brian F. Smith and Associates on February 16, 2021)

MM CR 1: At least 30 days prior to beginning Project construction, the Project Applicant shall contact the Tribe(s) of grading, excavation, and the monitoring program and, if a Cultural Resources Treatment and Monitoring Agreement has not been developed, to develop a Cultural Resources Treatment and Monitoring Agreement between the Applicant and the Tribes. The Agreement shall address the treatment of known cultural resources, the designation, responsibilities, and participation of professional Native American Tribal monitors during grading, excavation and ground disturbing activities; Project grading and development scheduling; terms of compensation for the monitors; and treatment and final disposition of any cultural resources, sacred sites, and human remains discovered on the site.

MM CR 2: If inadvertent discoveries of subsurface archaeological/cultural resources are discovered during grading, the developer, the Project archaeologist, and the Tribe(s) shall assess the significance of such resources and shall meet and confer regarding the mitigation for such resources. Pursuant to Calif. Pub. Res. Code 21083.2(b) avoidance is the preferred method for archaeological resources. If the developer, the Project archaeologist, and the Tribe(s) cannot agree on the significance or the mitigation for such resources, these issues will be presented to the Community Development Director for decision. The Community Development Director shall make the determination based on the provisions of CEQA with respect to the archaeological resources and shall take into account the religious beliefs, customs,

and practices of the Tribe(s). Notwithstanding any other rights available under the lay, the decision of the Community Development Direct shall be appealable to the Planning Commission and/or City Council.

#### **No Substantial Change from Previous Analysis:**

The proposed Project is consistent with the project evaluated in the Adopted MND in terms of the physical disturbance area. Specifically, the proposed Project would not develop or disturb any additional property that was not assumed to be developed by the Adopted MND. The adopted MND concluded that no historic resources were identified on the Project site. For the proposed Project, a Cultural Resources Assessment was conducted by Brian F. Smith and Associates (BFSA) in 2021. BFSA conducted a records search and a cultural resources field survey on the Project site and no historic resources were identified within the boundaries of the Project site. In addition, the Project site is not located within any of the City of Riverside's "Existing & Potential Historic Districts and Neighborhood Conservation Areas." In addition, a Sacred Lands File (SLF) search of the Native American Heritage Commission (NAHC) did not indicate the presence of any Native American sacred sites or locations of religious or ceremonial importance. As such, no impacts to historic resources would occur and the proposed Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

As required by the Adopted MND, the Project applicant is required to comply with MM CR-1 and MM CR-2 in the event that a resource is discovered during ground-disturbing construction activities. Consistent with the Adopted MND, impacts would remain less than significant with mitigation incorporated.

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

(Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Appendix D — Cultural Resources Study, Cultural Resources Survey prepared by Power Engineers on May 2015, Cultural Resources Survey prepared by Brian F. Smith and Associates on February 16, 2021)

MM CR 1: At least 30 days prior to beginning Project construction, the Project Applicant shall contact the Tribe(s) of grading, excavation, and the monitoring program and, if a Cultural Resources Treatment and Monitoring Agreement has not been developed, to develop a Cultural Resources Treatment and Monitoring Agreement between the Applicant and the Tribes. The Agreement shall address the treatment of known cultural resources, the designation, responsibilities, and participation of professional Native American Tribal monitors during grading, excavation and ground disturbing activities; Project grading and development scheduling; terms of compensation for the monitors; and treatment and final disposition of any cultural resources, sacred sites, and human remains discovered on the site.

MM CR 2: If inadvertent discoveries of subsurface archaeological/cultural resources are discovered during grading, the developer, the Project archaeologist, and the Tribe(s) shall assess the significance of such resources and shall meet and confer regarding the mitigation for such resources. Pursuant to

Calif. Pub. Res. Code 21083.2(b) avoidance is the preferred method for archaeological resources. If the developer, the Project archaeologist, and the Tribe(s) cannot agree on the significance or the mitigation for such resources, these issues will be presented to the Community Development Director for decision. The Community Development Director shall make the determination based on the provisions of CEQA with respect to the archaeological resources and shall take into account the religious beliefs, customs, and practices of the Tribe(s). Notwithstanding any other rights available under the lay, the decision of the Community Development Direct shall be appealable to the Planning Commission and/or City Council.

# **No Substantial Change from Previous Analysis:**

The Adopted MND concluded that no cultural resources were identified on the Project site. However, in order to address potential discoveries of Tribal Cultural Resources (TCRs), the Adopted MND included mitigation to protect any possible resources that may be uncovered by the Project's grading activities and that would need to be to be properly identified and treated. With implementation of Mitigation Measure (MM) MM CR-1 and MM CR-2, impacts were determined to be less than significant.

As discussed above in Threshold (a), for the proposed Project, a Cultural Resources Assessment was conducted by BFSA in 2021. BFSA conducted a records search and a cultural resources field survey on the Project site which did not identify any cultural resources within the Project site. Based on the presence of cultural resources offsite within 0.50-mile of the Project site, BFSA determined, similar to the conclusions in the adopted MND, that the potential exists that unidentified cultural resources may exist within the Project site that may be uncovered during the Project's grading activities. As such, no impacts to known archaeological resources would occur and the proposed Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

As required by the Adopted MND, the Project applicant is required to comply with MM CR-1 and MM CR-2 in the event that a resource is discovered during ground-disturbing construction activities. Consistent with the Adopted MND, impacts would remain less than significant with mitigation incorporated.

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

(Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity)

# **No Substantial Change from Previous Analysis:**

The adopted MND concluded that where construction is proposed in undeveloped areas, disturbance on vacant lands could have the potential to disturb or destroy buried Native American human remains as well as other human remains, including those interred outside of formal cemeteries. Consistent with State laws protecting these remains, sites containing human remains must be identified and treated in a sensitive manner. In the event that Native American human remains are inadvertently discovered during project-related construction activities, there would be unavoidable significant adverse impacts to Native American resources, but implementation of the Cultural Resources Mitigation Measures will, however,

reduce impacts to human remains, including those interred outside of formal cemeteries to a less than significant level.

Consistent with the findings of the Adopted MND, in the event that human remains are discovered during Project-related grading or other ground disturbing activities, compliance with the applicable provisions of California Health and Safety Code §7050.5 as well as Public Resources Code §5097 et. seq. are required. These regulations specify requirements that must be followed in the event that human remains are discovered and the process to undertake should the coroner identify the remains as Native American. The proposed Project has no greater potential to uncover human remains than was assumed in the Adopted MND. As such, the proposed Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

# 5.1.6 Energy

		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
VI. Energy. Would the project:					
a.	Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			$\boxtimes$	
b.	Conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?			×	

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

(Source: California Building Standards Code Title 24; California Air Resources Board – the Advanced Clean Truck Regulation; and Executive Order N-79-20)

# No Substantial Change from Previous Analysis:

The CEQA Energy thresholds listed in this Addendum were not required by CEQA at the time the MND was adopted. Nonetheless, information about the approved project's energy use was available in the MND's discussion of utilities and was used in calculations for air quality emissions. The use of energy to construct and operate buildings was a commonly understood concept when the MND was prepared and with a reasonable exercise of diligence, information about the approved project's use of energy was available in the public record; no concerns about energy consumption were raised. For information disclosure in this MND Addendum, an analysis of the proposed Project's projected energy use is provided below.

The Project involves the construction and operation of one 115,526 s.f. warehouse building and associated improvements. To accomplish the Project, the vacant site and the location of an adjacent car wash facility would be developed, which would entail demolition of the car wash structure and its associated improvements. The proposed Project would not develop or disturb any additional property that was not assumed to be developed by the Adopted MND and the proposed Project's construction equipment and construction duration would be similar to the Project that was evaluated by the Adopted MND; therefore the Project's potential to result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during construction of the Project, would be similar to that analyzed in the Adopted MND.

The operational characteristics associated with the proposed warehouse use (e.g., traffic and traffic-related impacts (the proposed Project is estimated to generate a total of 1,414 fewer two-way trips per day as compared to the existing use (Urban Crossroads, Inc., 2021a, p. 4) and are less intensive than the commercial and industrial land uses evaluated for the Project site as part of the Adopted MND; therefore, the Project's potential to result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project operation of the Project would be less than that analyzed in the Adopted MND.

For new development such as the proposed Project, compliance with California Building Standards Code Title 24 energy efficiency requirements (CALGreen) is considered demonstrable evidence of efficient use of energy, and the Project would be subject to the current version of the Title 24 energy efficiency requirements, which are more stringent than the energy efficiency requirements in place at the time the Adopted MND was adopted. The Project Applicant would be required to meet all CALGreen standards. In addition, the Project does not include uses or operations that would inherently result in excessive and wasteful energy consumption. Because the Project would be subject to the CALGreen requirements, and because the Project Applicant does not propose operational characteristics that are substantially different from other similarly situated industrial warehouse developments, the Project would not result in the inefficient, wasteful, or unnecessary consumption of energy. Regarding energy required for passenger vehicle and truck travel, in June 2020, CARB adopted a new Rule requiring truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California will be required to be zero-emission. Subsequently in September 2020, Governor Newsom directed by Executive Order that the CARB develop regulations to mandate that 100 percent of in-state sales of new passenger cars and trucks are zero-emission by 2035. As such, the use of gasoline and diesel fuel will decrease over time. Furthermore, the Project would not cause or result in the need for additional energy facilities or energy delivery systems.

In conclusion, impacts due to energy consumption would be less than significant. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

# b) Would the Project conflict with a State or Local plan for renewable energy or energy conservation?

(Source: California Building Standards Code Title 24; California Air Resources Board – the Advanced Clean Truck Regulation; and Executive Order N-79-20)

# **No Substantial Change from Previous Analysis:**

The CEQA Energy thresholds listed in this Addendum were not required by CEQA at the time the MND was adopted. Nonetheless, information about the approved project's energy use was available in the MND's discussion of utilities and was used in calculations for air quality emissions. The use of energy to construct and operate buildings was a commonly understood concept when the MND was prepared and with a reasonable exercise of diligence, information about the approved project's use of energy was available in the public record; no concerns about energy consumption were raised. For information disclosure in this MND Addendum, an analysis of the proposed Project's projected energy use is provided below.

The Project involves the construction and operation of one 115,526 s.f. warehouse building and associated improvements. To accomplish the Project, the vacant site and the location of an adjacent car wash facility would be developed, which would entail demolition of the car wash structure and its associated improvements. The proposed Project would not develop or disturb any additional property that was not assumed to be developed by the Adopted MND and the proposed Project's construction equipment and construction duration would be similar to the Project that was evaluated by the Adopted MND; therefore, the Project's potential to result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction, would be similar to that analyzed in the Adopted MND.

The operational characteristics associated with the proposed warehouse use (e.g., traffic and traffic-related impacts) are less intensive than the commercial and industrial land uses evaluated for the Project site as part of the Adopted MND; therefore, the Project's potential to result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project operation of the Project would be less than that analyzed in the Adopted MND.

Because the Project would result in similar energy consumption during construction as that of the project analyzed in the Adopted MND and would result in less energy consumption than the project evaluated in the Adopted MND, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

# 5.1.7 Geology and Soils

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

- a) Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - I). Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

(Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, General Plan 2025 FPEIR Appendix E – Geotechnical Report, Geotechnical Report prepared by Salem Engineering Group, Inc. on July 31, 2014, Geotechnical Investigation Update Report prepared by Salem Engineering Group, Inc. on April 4, 2019)

# No Substantial Change from Previous Analysis:

The proposed Project is consistent with the project evaluated in the Adopted MND in terms of the physical disturbance area. Specifically, the proposed Project would not develop or disturb any additional property that was not assumed to be developed by the Adopted MND. Consistent with the conditions evaluated in the Adopted MND, no Alquist-Priolo Earthquake Fault Zone is presently known to exist in the City of Riverside. The site is in a seismically active region as is most of Southern California; however, no active or potentially active faults are presently known to exist at the Project site nor is the Project site situated within an Alquist-Priolo Earthquake Fault Zone.

The Adopted MND concluded that compliance with the California Building Code (CBC) regulations would ensure that no impacts would occur. As such, consistent with the Adopted MND, the proposed Project would result in no impacts due to a rupture of a known earthquake fault. Therefore, the proposed Project would not result in any new impacts not already analyzed in the adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

## II). Strong seismic ground shaking?

(Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, and Appendix E – Geotechnical Report, Geotechnical Report prepared by Salem Engineering Group, Inc. on July 31, 2014, Geotechnical Report prepared by Salem Engineering Group, Inc. on April 4, 2019)

## No Substantial Change from Previous Analysis:

Consistent with the conditions evaluated in the Adopted MND, the San Jacinto Fault Zone located in the northeastern portion of the City, or the Elsinore Fault Zone, located in the southern portion of the City's Sphere of Influence, have the potential to cause moderate to large earthquakes that would cause intense ground shaking. Because the proposed Project complies with CBC regulations, no significantly adverse impact would occur.

The Adopted MND concluded that compliance with the CBC regulations would ensure that no impacts would occur. As such, consistent with the Adopted MND, the proposed Project would result in no impacts due to a rupture of a known earthquake fault or due to any strong seismic shaking. Therefore, the proposed Project would not result in any new impacts not already analyzed in the adopted MND, and the

Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

# II). Seismic-related ground failure, including liquefaction?

(Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Appendix E – Geotechnical Report, Title 18 – Subdivision Code, Title 17 – Grading Code, and Storm Water Pollution Prevention Plan SWPPP, Geotechnical Report prepared by Salem Engineering Group, Inc. on July 31, 2014, Geotechnical Report prepared by Salem Engineering Group, Inc. on April 4, 2019)

# **No Substantial Change from Previous Analysis:**

Consistent with the conditions evaluated in the Adopted MND, the Project site is located in an area with low — moderate potential for liquefaction. Incorporation of the recommended design measures of the proposed Project's geotechnical study/preliminary soils report for compliance with the CBC regulations would ensure that impacts related to seismic-related ground failure, including liquefaction, are reduced to less than significant.

The Adopted MND concluded that compliance with the CBC regulations would ensure that no impacts would occur. As such, with compliance with the CBC and the recommendations of the Project's geotechnical investigation, impacts related to seismic-related ground failure, including liquefaction, would be reduced to less than significant. Thus, consistent with the Adopted MND, impacts would remain less than significant. Therefore, the proposed Project would not result in any new impacts not already analyzed in the adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

# IV). Landslides?

(Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Appendix E – Geotechnical Report, Title 18 – Subdivision Code, Title 17 – Grading Code, and Storm Water Pollution Prevention Plan SWPPP, Geotechnical Report prepared by Salem Engineering Group, Inc. on July 31, 2014, Geotechnical Report prepared by Salem Engineering Group, Inc. on April 4, 2019)

## No Substantial Change from Previous Analysis:

The proposed Project is consistent with the project evaluated in the Adopted MND in terms of the physical disturbance area. Specifically, the proposed Project would not develop or disturb any additional property that was not assumed to be developed by the Adopted MND. Consistent with the conditions evaluated in the Adopted MND, the Project site and its surroundings have generally flat topography and are not located in an area prone to landslides per Figure 5.6-1 of the General Plan 2025 Program Final EIR. Consistent with the Adopted MND, no impact would occur. Therefore, the proposed Project would not result in any new impacts not already analyzed in the adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

## b) Would the Project result insubstantial soil erosion, or the loss of topsoil?

(Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Title 18 – Subdivision Code, Title 17 – Grading Code, SWPPP, Geotechnical Report prepared by Salem Engineering Group, Inc. on July 31, 2014, Geotechnical Report prepared by Salem Engineering Group, Inc. on April 4, 2019)

# **No Substantial Change from Previous Analysis:**

Consistent with the conditions evaluated in the Adopted MND, erosion and loss of topsoil could occur as a result of the Project. State and federal requirements call for the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) establishing erosion and sediment controls for construction activities. The Project must also comply with the National Pollutant Discharge Elimination System (NPDES) regulations. In addition, with the erosion control standards for which all development activity must comply (Title 18 — Subdivision Code), the Grading Code (Title 17) also require the implementation of measures designed to minimize soil erosion. Compliance with State and Federal requirements as well as Titles 17 and 18 would ensure that impacts related to soil erosion or loss of topsoil would remain than significant. Therefore, the proposed Project would not result in any new impacts not already analyzed in the adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

c) Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

(Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, Figure 5.6-1 - Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, and Appendix E – Geotechnical Report, Geotechnical Report prepared by Salem Engineering Group, Inc. on July 31, 2014, Geotechnical Report prepared by Salem Engineering Group, Inc. on April 4, 2019)

## No Substantial Change from Previous Analysis:

Consistent with the conditions evaluated in the Adopted MND, the general topography of the Project site is flat. Compliance with the City's existing codes and the policies contained in the General Plan 2025 help to ensure that impacts related to geologic conditions remain less than significant. Therefore, the proposed Project would not result in any new impacts not already analyzed in the adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

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

(Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Figure 5.6-5 – Soils with High Shrink-Swell Potential, Appendix E – Geotechnical Report, and California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code,

Geotechnical Report prepared by Salem Engineering Group, Inc. on July 31, 2014, Geotechnical Report prepared by Salem Engineering Group, Inc. on April 4, 2019)

## **No Substantial Change from Previous Analysis:**

Consistent with the conditions evaluated in the Adopted MND, the soil type onsite is known to be an expansive soil. Compliance with the recommendations of the soils report and applicable provisions of the City's Subdivision Code- Title 18 and the CBC with regard to soil hazards related to the expansive soils, would ensure that impacts remain less than significant. Therefore, the proposed Project would not result in any new impacts not already analyzed in the adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

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

(Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Geotechnical Report prepared by Salem Engineering Group, Inc. on July 31, 2014, Geotechnical Report prepared by Salem Engineering Group, Inc. on April 4, 2019)

## **No Substantial Change from Previous Analysis:**

As anticipated by the Adopted MND, the Project Applicant proposes to connect to the City of Riverside's sanitary sewer system. Consistent with the findings of the Adopted MND, because the Project Applicant does not propose septic tanks or alternative waste water disposal systems, nor do any such facilities occur on site under existing conditions, no impact would occur. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

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

(Source: General Plan 2025 Policy HP-1.3, Paleontological Assessment prepared by Brian F. Smith and Associates on February 16, 2021)

MM-3: A qualified paleontologist (the "Project Paleontologist") shall be retained by the developer prior to the issuance of a grading permit. The Project Paleontologist shall be on-call to monitor ground-disturbing activities and excavations on the Project site in the event potential paleontological resources by project personnel are encountered during implementation of the Project. The Project Paleontologist will be allowed to temporarily divert or redirect grading or excavation activities in the vicinity in order to make an evaluation of the find. If the resource is significant, Mitigation Measure CR-4 shall apply.

MM-4: If a significant paleontological resource(s) is discovered on the Project site, in consultation with the Project proponent and the City, the qualified paleontologist shall develop a plan of mitigation which shall include salvage excavation and removal of the find, removal of sediment from around the

specimen (in the laboratory), research to identify and categorize the find, curation of the find in a qualified repository, and preparation of a report summarizing the find.

# **No Substantial Change from Previous Analysis:**

The Adopted MND concluded that activities including construction-related and earth-disturbing actions, could damage or destroy fossils in rock units. A cultural resources survey prepared by Power Engineers in May 2015 determined that the project was consistent with General Plan Policy HP-1.3 including compliance with the Federal Native American Graves Protection and Repatriation Act, and as such, impacts were determined to be less than significant.

As concluded in the Adopted MND and the site-specific Paleontological Assessment conducted by Brian F. Smith and Associates (*Technical Appendix G*) in 2021, there is no evidence that paleontological resources exist on the subject property. Notwithstanding, the Adopted MND and the Paleontological Assessment acknowledged that ground-disturbing activities may have the potential to uncover previously undiscovered resources, including unique paleontological resources or unique geologic features. Consistent with the project evaluated by the Adopted MND, the proposed Project would be consistent with the City's General Plan Policy HP-1.3, which ensures protection of sites of archaeological and paleontological significance and ensures compliance with all applicable State and federal cultural resources protection and management laws.

As required by the Adopted MND, the Project applicant is required to comply with Adopted MND Mitigation Measures (MM) MM CR-3 and MM CR-4, in the event that a resource is discovered during ground-disturbing construction activities. Therefore, consistent with the Adopted MND, impacts remain less than significant with implementation of mitigation. Thus, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

#### 5.1.8 Greenhouse Gas Emissions

		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact	
VIII. GREENHOUSE GAS EMISSIONS. WOULD THE PROJECT:						
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			$\boxtimes$		
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			$\boxtimes$		

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

(Source: GHG Analysis prepared by Yorke Engineering, LLC on March 2015, Greenhouse Gas Analysis prepared by Urban Crossroads, Inc. on October 26, 2021)

## No Substantial Change from Previous Analysis:

The Project involves the construction and operation of one 115,526 s.f. warehouse building and associated improvements. To accomplish the Project, the vacant site and the location of an adjacent car wash facility would be developed, which would entail demolition of the car wash structure and its associated improvements. The Project Applicant would not construct the previously entitled commercial buildings, the vehicle fuel station or the vehicle wash facility, but would construct the previously entitled industrial building, at a slightly larger size than previously approved. The proposed Project would not develop or disturb any additional property that was not assumed to be developed by the Adopted MND and the proposed Project's construction equipment and construction duration would be similar to the Project that was evaluated by the Adopted MND. The operational characteristics associated with the proposed warehouse use (e.g., traffic and traffic-related impacts) are less intensive than the commercial and industrial land uses evaluated for the Project site as part of the Adopted MND.

The Adopted MND concluded that because the project evaluated in the MND is consistent with the City's General Plan, the project would not interfere with the State's goals of reducing greenhouse gas emissions to 1990 levels by the year 2020 as stated in AB 32 and an 80 percent reduction in GHG emissions below 1990 levels by 2050 as stated in Executive Order S-3-05. In addition, the Adopted MND concluded that emissions resulting from the project were expected to be far lower than the SCAQMD thresholds for significance and impacts were determined to be less than significant in regard to GHG emissions.

A Greenhouse Gas Analysis was prepared for the proposed Project in 2021 and is attached to this Addendum as *Technical Appendix F*. The analysis provides a comparison of the emissions disclosed in the

Adopted MND to the emissions anticipated in association with the proposed Project's industrial uses. The annual GHG emissions associated with the operation of the proposed Project are summarized in Table 5-6, *Project GHG Emissions*. As shown, construction and operation of the proposed Project would generate approximately 1,349.01 metric tons of carbon dioxide equivalent per year (MTCO2e/yr.). Thus, the proposed Project would not exceed the SCAQMD/City's screening threshold of 3,000 MTCO2e/yr.; therefore, Project-related GHG emissions would not have a significant direct or indirect impact on GHG and climate change and no mitigation or further analysis is required. (Urban Crossroads, Inc., 2021a, pp. 47, 49)

Table 5-6 Project GHG Emissions

F	Emissions (MT/yr)					
Emission Source	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Total CO₂e		
Annual construction-related emissions amortized over 30 years	23.67	0.00	0.00	23.77		
Area Source	0.01	3.00E-05	0.00	0.01		
Energy Source	149.54	3.25E-03	8.00E-04	149.86		
Mobile Source	804.38	0.02	0.00	804.76		
On-Site Equipment	50.79	0.02	0.00	51.20		
Waste	22.09	1.31	0.00	54.72		
Water Usage	236.36	0.88	0.02	264.68		
Total CO₂e (All Sources)	1,349.01					

(Urban Crosssroads, Inc., 2021b, Table 2-6)

The estimated GHG emissions for Project buildout conditions relative to the currently approved Project disclosed in the Adopted MND are summarized in Table 5-7, *Adopted MND GHG Emissions*. As shown in Table 5-8, GHG Emissions Comparison, the proposed Project is anticipated to generate fewer GHG emissions as compared to emissions generated by the currently approved uses. (Urban Crosssroads, Inc., 2021b, pp. 47-48)

Table 5-7 Adopted MND GHG Emissions

Emission Source	Emissions (MT/yr)					
Emission source	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Total CO₂e		
Annual construction-related emissions amortized over 30 years	22.83	0.00	0.00	22.90		
Operational	1,896.00	1.84	0.02	1,940.00		
Total CO₂e (All Sources)		1,962.90				

(Urban Crosssroads, Inc., 2021b, Table 5-7)

Emission Source

Approved Project<sup>12</sup>

1,962.90

Proposed Project<sup>13</sup>

1,349.01

Differnece (Proposed – Approved Proejct)

-613.89

Table 5-8 GHG Emissions Comparison

(Urban Crosssroads, Inc., 2021b, Table 5-8)

Because the proposed Project would generate fewer GHG emissions than the project evaluated by the Adopted MND, the Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Consistent with the Adopted MND, impacts would remain less than significant. The proposed Project also would be subject to all applicable regulatory requirements addressing GHG emissions. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND and the Project would not increase the severity of a significant impact as previously identified and analyzed Adopted MND.

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

(Source: GHG Analysis prepared by Yorke Engineering, LLC on March 2015, Greenhouse Gas Analysis prepared by Urban Crossroads, Inc. on October 26, 2021)

## No Substantial Change from Previous Analysis:

The City of Riverside collaborated with the Western Riverside Council of Governments (WRCOG) on a Subregional Climate Action Plan (CAP). The City of Riverside Restorative Growthprint Climate Action Plan (RRG CAP) builds on the WRCOG Subregional CAP commitments and provides the City GHG reduction goals beyond 2020 to 2035. Through the WRCOG Subregional CAP process, the City has adopted a 2020 community-wide GHG emissions target of 2,224,908 MTCO2e, which represents a 15% reduction from the City's 2010 GHG emissions baseline inventory, and a 2035 emissions target of 1,532,274 MTCO2e, 49% below the 2007 baseline. These reduction targets are consistent with the statewide AB 32 goal of reducing emissions to 1990 levels and fulfill the requirements of SB 375. (Urban Crosssroads, Inc., 2021b, p. 38)

Based on a review of the proposed Project, the proposed Project would not conflict with any of the GHG reduction strategies set forth in the RRG-CAP (Urban Crosssroads, Inc., 2021b, pp. 55-62). The proposed Project is consistent with CARB's Final 2017 Scoping Plan Update, which reflects the 2030 target of a 40% reduction below 1990 levels set by Executive Order B-30-15 and codified by Senate Bill 32 (SB 32) (Urban Crosssroads, Inc., 2021b, pp. 49-55) There are no other applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions that apply to the Project area. Furthermore, and as discussed under Response (a) above, the proposed Project would generate only 1,347.81 MTCO2e/yr, resulting in a reduction of 615.09 MTCO2e/yr. as compared to the level of emissions that were disclosed for the Project analyzed in the Adopted MND. Because the proposed Project would be consistent with the applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases, consistent with the Adopted MND, impacts would remain less than significant and the proposed

Project would result in fewer GHG emissions than the project disclosed in the Adopted MND. The proposed Project also would be subject to all applicable regulatory requirements addressing GHG emissions. Therefore, the Project would not result in any new impacts not already analyzed in Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed Adopted MND.

# 5.1.9 Hazards and Hazardous Materials

		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
IX. HAZA	RDS AND HAZARDOUS MATERIALS. Would the project:				
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			$\boxtimes$	
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
C.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				$\boxtimes$
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				$\boxtimes$
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?			$\boxtimes$	
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				

		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				$\boxtimes$

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

(Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, Riverside Fire Department EOP, 2002 and Riverside Operational Area — Multi-Jurisdictional LHMP, 2004 Part 1, OEM's Strategic Plan, Phase I Environmental Site Assessment prepared by HMC on December 14, 2020, Phase II Environmental Site Assessment prepared by HMC on January 7, 2021)

#### **No Substantial Change from Previous Analysis:**

Regarding existing site conditions, the Phase I ESA prepared for the Project site in 2020 by HMC disclosed that releases of gasoline at the adjacent ARCO station poses a potential vapor intrusion condition to the site. In 2021, HMC conducted a Limited Phase II Soil Vapor Investigation at the site targeting the area west of the ARCO facility. The Limited Phase II Soil Vapor Investigation disclosed the presence of elevated concentrations of VOCs in soil gas above vapor intrusion screening levels. With implementation of the Project's design features, vapor intrusion levels would be at acceptable screening levels.

Regarding construction activity, the Project Applicant would not construct the previously entitled commercial buildings, the vehicle fuel station or the vehicle wash facility, but would construct the previously entitled industrial building, at a larger size than previously approved. The proposed Project would not develop or disturb any additional property that was not assumed to be developed by the Adopted MND and the proposed Project's construction equipment and construction duration would be similar to the Project that was evaluated by the Adopted MND. Therefore, the Project would not result in any increased impacts due to significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during the construction phase as compared to what was evaluated and disclosed by the Adopted MND. With respect to the routine transport, use, or disposal of hazardous materials, the operational characteristics of the uses proposed by the Project Applicant is consistent with the industrial use proposed for the project evaluated in the Adopted MND. Consistent with the findings of the Adopted MND, through compliance with all applicable federal and State laws, the likelihood and severity of accidents would be reduced and impacts would remain less than significant.

Consistent with the conclusion reached by the Adopted MND, because the Project Applicant is required to comply with all applicable federal and State laws, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

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?

(Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, Riverside Fire Department EOP, 2002 and Riverside Operational Area — Multi-Jurisdictional LHMP, 2004 Part 1, OEM's Strategic Plan, Phase I Environmental Site Assessment prepared by HMC on December 14, 2020, Phase II Environmental Site Assessment prepared by HMC on January 7, 2021)

#### **No Substantial Change from Previous Analysis:**

Regarding existing site conditions, the Phase I ESA prepared for the Project site in 2020 by HMC disclosed that releases of gasoline at the adjacent ARCO station poses a potential vapor intrusion condition to the site. In 2021, HMC conducted a Limited Phase II Soil Vapor Investigation at the site targeting the area west of the ARCO facility. The Limited Phase II Soil Vapor Investigation disclosed the presence of elevated concentrations of VOCs in soil gas above vapor intrusion screening levels. With implementation of the Project's design features, vapor intrusion levels would be at acceptable screening levels.

Regarding construction activity, the Project Applicant would not construct the previously entitled commercial buildings, the vehicle fuel station or the vehicle wash facility, but would construct the previously entitled industrial building, at a larger size than previously approved. The proposed Project would not develop or disturb any additional property that was not assumed to be developed by the Adopted MND and the proposed Project's construction equipment and construction duration would be similar to the Project that was evaluated by the Adopted MND. Therefore, the Project would not result in any increased impacts due to significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during the construction phase as compared to what was evaluated and disclosed by the Adopted MND. With respect to the routine transport, use, or disposal of hazardous materials, the operational characteristics of the uses proposed by the Project Applicant is consistent with the industrial use proposed for the project evaluated in the Adopted MND. Consistent with the findings of the Adopted MND, through compliance with all applicable federal and State laws, the likelihood and severity of accidents would be reduced and impacts would be less than significant.

Consistent with the conclusion reached by the Adopted MND, because the Project Applicant is required to comply with all applicable federal and State laws, the Project would not 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. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

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?

(Source: General Plan 2025 Public Safety and Education Elements, GP 2025 FPEIR Table 5.7-D - CalARP RMP Facilities in the Project Area, Figure 5.13-2 – RUSD Boundaries, Table 5.13-D RUSD Schools, Figure 5.13-3 AUSD Boundaries, Table 5.13-E AUSD Schools, Figure 5.13-4 – Other School District Boundaries, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code)

#### **No Substantial Change from Previous Analysis:**

As noted in the Adopted MND, there are no existing or proposed schools within one-quarter mile of the Project site. The nearest existing school is the Pacific View Charter School, located approximately 1.1 mile southeast of the Project site. Because the Project site is not located within one-quarter mile of a school and the Project is not associated with the storage, use, or handling of hazardous materials, substance, or waste, consistent with the Adopted MND, no impact would occur. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

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

(Source: General Plan 2025 Figure PS-5 – Hazardous Waste Sites, GP 2025 FPEIR Tables 5.7-A – CERCLIS Facility Information, Figure 5.7-B – Regulated Facilities in TRI Information and 5.7-C – DTSC EnviroStor Database Listed Sites)

#### **No Substantial Change from Previous Analysis:**

Consistent with the conclusion reached by the Adopted MND, there are no known existing hazardous material conditions on the site and the Project site is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Consistent with the Adopted MND, no impact would occur. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

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?

(Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, Airport Land Use Commission (ALUC) Development Review dated April 8, 2021; File No. ZAP1452MA21)

#### **No Substantial Change from Previous Analysis:**

Consistent with the project evaluated within the Adopted MND, the Project site is located within Compatibility Zone B1 and Accidental Potential Zone 2 (APZ II) of the March Air Reserve Base/Inland Port Airport (MARB/IP Airport). The Project was reviewed by the Airport Land Use Commission (ALUC) on April

8, 2021 to ensure the Project is consistent with the compatibility zone as well as in compliance with the land use standards in the RCALUCP. Consistent with the findings of the Adopted MND, because the Project would be consistent with the ALUC, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area, and impacts would be less than significant. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

## f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

(Source: GP 2025 FPEIR Chapter 7.5.7 – Hazards and Hazardous Materials)

#### No Substantial Change from Previous Analysis:

As concluded in the Adopted MND, the project will be served by existing, fully improved streets, as well as a network of on-site local streets and drive aisles. All streets have been designed to meet the Public Works and Fire Departments' specifications. Consistent with the Adopted MND, any street closing needed during the Project's construction would be of short duration so as not to interfere or impede with any emergency response or evacuation plan. Therefore, consistent with the Adopted MND, the Project would have a less than significant impact to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

## g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

(Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas, GIS Map Layer VHFSZ 2010)

#### **No Substantial Change from Previous Analysis:**

Consistent with the finding of the Adopted MND, because the Project site is not located near any wildland fire hazard zones, the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, and no impact would occur. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

### 5.1.10 Hydrology and Water Quality

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

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

(Source: GP 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water and Project Specific Hydrology Study and/or Water Quality Management Plan prepared by SDH & Associates, Preliminary Hydrology Calculations prepared by Thienes Engineering and dated January 19, 2021, Project Specific Water Quality Management Plan prepared by Thienes Engineering and dated March 2021)

#### No Substantial Change from Previous Analysis:

The California Porter-Cologne Water Quality Control Act (§ 13000 ["Water Quality"] et seq., of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act [CWA]) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the Santa Ana Regional Water Quality Control Board (RWQCB). Consistent with the conditions that existed when the Adopted MND was adopted, the Project Applicant would be required to comply with the Santa Ana RWQCB's Santa Ana River Basin Water Quality Control Plan.

A specific provision of the CWA applicable to the proposed Project is CWA Section 402, which authorizes the National Pollutant Discharge Elimination System (NPDES) permit program that covers point sources of pollution discharging to a water body. The NPDES program also requires operators of construction sites one acre or larger to prepare a Stormwater Pollution Prevention Plan (SWPPP) and obtain authorization to discharge stormwater under an NPDES construction stormwater permit. These requirements have not substantially changed since the Adopted MND was adopted.

Construction activities would occur on the same site and in a similar manner as assumed by the Adopted MND. As with the project evaluated by the Adopted MND, construction of the proposed Project would involve clearing, grading, paving, utility installation, building construction, and landscaping activities, which would result in the generation of potential water quality pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction of the Project in the absence of any protective or avoidance measures. However, pursuant to the requirements of the Santa Ana RWQCB, and consistent with the requirements that were in effect when the Adopted MND was adopted, the Project Applicant would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. Compliance with the NPDES permit involves the preparation and implementation of a SWPPP for construction-related activities, and these requirements also would have applied to new development at the time the Adopted MND was adopted. The SWPPP is required to specify the best management practices (BMPs) that the Project Applicant would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. As with the project evaluated in the Adopted MND, mandatory compliance with the SWPPP would ensure that the proposed Project does not violate any water quality standards or waste discharge requirements during construction activities. Therefore, with mandatory adherence to the

required SWPPP, water quality impacts associated with construction activities would remain less than significant and no mitigation measures would be required.

For long-term operating conditions, the Project Applicant would be required to implement its site-specific Water Quality Management Plan (WQMP), pursuant to the requirements of the applicable NPDES permit. The WQMP is a post-construction management program that ensures the on-going protection of the watershed basin by requiring structural and programmatic controls. The WQMP requires the implementation of structural control measures (e.g., detention basins) and operational source control measures (e.g., requirements for regular sweeping of parking areas, etc.). The structural and operational source control measures would minimize, prevent, and/or otherwise appropriately treat storm water runoff flows before they are discharged from the site. Mandatory compliance with the WQMP would ensure that the Project does not violate any water quality standards or waste discharge requirements during long-term operation.

Based on the foregoing analysis, and consistent with the conclusion reached by the Adopted MND, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, and no impact would occur. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

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

(Source: General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, Table PF-3 – Western Municipal Water District Projected Domestic Water Supply (AC-FT/YR), RPU Map of Water Supply Basins, RPU Urban Water Management Plan, WMWD Urban Water Management Plan, Preliminary Hydrology Calculations prepared by Thienes Engineering and dated January 19, 2021, Project Specific Water Quality Management Plan prepared by Thienes Engineering and dated March 2021)

#### **No Substantial Change from Previous Analysis:**

Consistent with the Adopted MND, the Project site is located within the Riverside South Water Supply Basin and is required to connect to the City's sewer system and comply with all NPDES and WQMP requirements, which would ensure the Project would not substantially deplete groundwater supplies or interfere with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. As such and consistent with the conclusion reached by the Adopted MND, Project impacts would be less than significant. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

- c) Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner in which would:
  - I. Result in substantial erosion or siltation on- or off-site;

(Source: Preliminary Grading Plan, Preliminary Hydrology Calculations prepared by Thienes Engineering and dated January 19, 2021, Project Specific Water Quality Management Plan prepared by Thienes Engineering and dated March 2021)

#### **No Substantial Change from Previous Analysis:**

The Adopted MND concluded that the Project would not alter the existing drainage pattern of the site, alter the course of stream or river, or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site and with compliance with the NPDES requirements, a SWPP, and WQMP, impacts would be less than significant.

The Preliminary Hydrology Calculations and the WQMP prepared in 2021, conclude that the proposed condition drainage pattern mimics the pre-development conditions and runoff would continue to drain to the existing offsite public storm drain located east of the northbound ramp and west of the Project site. The Project is designed to ensure that runoff from the site would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. Based on the foregoing and consistent with the findings of the Adopted MND, the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in substantial erosion of on or off-site. Consistent with the Adopted MND, impacts would remain less than significant. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

II. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

(Source: Preliminary Grading Plan, Preliminary Hydrology Calculations prepared by Thienes Engineering and dated January 19, 2021, Project Specific Water Quality Management Plan prepared by Thienes Engineering and dated March 2021)

The Adopted MND concluded that the Project would not alter the existing drainage pattern of the site, alter the course of stream or river, or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site and with compliance with the NPDES requirements, a SWPP, and WQMP, impacts would be less than significant.

The Preliminary Hydrology Calculations and the WQMP prepared in 2021, conclude that the proposed condition drainage pattern mimics the pre-development conditions and runoff would continue to drain to the existing offsite public storm drain located east of the northbound ramp and west of the Project site. The Project is designed to ensure that runoff from the site would not substantially increase the rate or

amount of surface runoff in a manner which would result in flooding on- or offsite. Based on the foregoing and consistent with the findings of the Adopted MND, the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site, and no impact would occur. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

III. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

(Source: Preliminary grading plan, Preliminary Hydrology Calculations prepared by Thienes Engineering, Inc. on February 19, 2021, Project Water Quality Management Plan prepared by Thienes Engineering, Inc. on March 12, 2021)

#### **No Substantial Change from Previous Analysis:**

Although minor modifications to the site's existing topography would occur with implementation of the proposed Project, the Project would not result in substantial alterations to the site's existing drainage pattern or the planned drainage pattern anticipated by the Adopted MND. An updated drainage study of the site (*Technical Appendix H1*) also concluded that development of the Project site would not change area drainage patterns or impact any surrounding properties. As mentioned under Response (a) above, the Project Applicant is required to implement a SWPPP and a WQMP, which would ensure that pollutants generated by the Project are treated through the incorporation of site design, and source control and treatment control measures. Because the Project's drainage pattern would be similar to the project evaluated by the Adopted MND and the Project Applicant is required to implement a SWPPP and WQMP, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Consistent with the Adopted MND, impacts would remain less than significant. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

#### IV. Impede or redirect flows?

(Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, FEMA Flood Hazard Maps)

#### No Substantial Change from Previous Analysis:

As noted by the Adopted MND, the Project site is not located within a flood prone or hazard area and the existing drainage system was designed with capacity to serve the Project. Because the Project site is not located within a flood prone or hazard area and construction activities associated with the proposed Project would be similar to the construction anticipated for the Project site by the Adopted MND, the Project would not substantially alter the existing drainage pattern of the site or area, including through

the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

# d) In flood hazard, tsunami, or seiche zones, would the proposed Project risk the release of pollutants due to project inundation?

(Source: GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality)

#### **No Substantial Change from Previous Analysis:**

The Project site is located approximately 40 miles from the Pacific Ocean, and is therefore not subject to hazards associated with tsunamis. Additionally, there are no large bodies of water within the Project site's vicinity that are capable of producing seiches that could affect the Project site. In addition, according to the Federal Emergency Management Agency, the Project site is not located within a flood prone or hazard area. Because the Project site is located approximately 40 miles from the Pacific Ocean and there are no large bodies of water within the Project site's vicinity, the Project would not flood and would not risk release of pollutants due to Project site inundation as a result of flood, tsunami, or seiche hazards. Consistent with the Adopted MND, no impact would occur. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

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

(Source: General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, Table PF-3 – Western Municipal Water District Projected Domestic Water Supply (AC-FT/YR), RPU Map of Water Supply Basins, RPU Urban Water Management Plan, WMWD Urban Water Management Plan)

#### **No Substantial Change from Previous Analysis:**

In 2014, the State of California enacted into law the Sustainable Groundwater Management Act (SGMA), which is intended to establish a framework for sustainable groundwater management. The SGMA requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. The Project Applicant would be subject to compliance with the City's Urban Water Management Plan (UWMP) and the Integrated Regional Water Management Plan (IRWMP). The purpose of the UWMP and IRWMP is to provide safe, adequate, and dependable water supplies in order to meet the future needs of the metropolitan area in an economical manner; protect groundwater quality from further degradation and overdraft; and, provide a plan of reasonably implementable measures and facilities. The Project Applicant also would be subject to compliance with the City's NPDES Permit. Refer also to the analysis of Responses (a) and (b), above.

Consistent with the findings of the Adopted MND, because the Project Applicant would comply with the City's UWMP, IRWMP, and NPDES Permit, the Project would not conflict with or obstruct implementation

of a water quality control plan or sustainable groundwater management plan, and no impact would occur. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified in the Adopted MND.

#### 5.1.11 Land Use and Planning

		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact	
XI. LAND USE AND PLANNING. Would the project:						
a.	Physically divide an established community?				$\boxtimes$	
b.	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			$\boxtimes$		

#### a) Would the physically divide an established community?

(Source: General Plan 2025 Land Use and Urban Design Element, Project Site Plan)

#### **No Substantial Change from Previous Analysis:**

The proposed Project is consistent with the project described in the Adopted MND in terms of physical location. Consistent with the findings of the Adopted MND, the Project site is currently undeveloped and is located in an area planned for commercial and industrial uses. A gas station with car wash facility is located to the east. While scattered residential uses occur to the east of the Project site, area to the north is planned and zoned for industrial development, and roadways border the Project site to the south and to the west. Because the Project site is not located within an established community or within the vicinity of an established community, the Project has no potential to physically divide an established community, and no impact would occur. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

b) Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

(Source: General Plan 2025, General Plan 2025 Figure LU-10 – Land Use Policy Map, Table LU-5 – Zoning/General Plan Consistency Matrix, Figure LU-7 – Redevelopment Areas, Sycamore Canyon Business Park Specific Plan, Title 19 – Zoning Code, Title 18 – Subdivision Code, Title 7 – Noise Code, Title 17 –

Grading Code, Title 20 – Cultural Resources Code, Title 16 – Buildings and Construction and Citywide Design and Sign Guidelines)

#### **No Substantial Change from Previous Analysis:**

The Adopted MND anticipated development of one 73,200 s.f. industrial building, two 4,000 s.f. commercial buildings, a 7,000 s.f. commercial building, a 2,572 s.f. diesel canopy and relocation of an existing 880 s.f. automated car wash. The Project includes an amendment to the City of Riverside General Plan Land Use Map that would change the Project site's land use designation from "Commercial" to "Business/Office Park." Approval of the requested General Plan Amendment would eliminate any potential inconsistency between proposed land uses and the site's existing land use designations. There are no environmental impacts that would result as a specific consequence of the proposed changes to the site's General Plan land use designation, beyond what is already evaluated and disclosed by this MND Addendum.

The Project also includes a Zone Change Amendment to amend the City of Riverside Zoning Map to change the zoning classification of the Project site from CR-SP - Commercial Retail and Specific Plan (Sycamore Canyon Business Park) Overlay Zones to BMP-SP - Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones. Approval of the requested Zone Change Amendment would eliminate any potential inconsistency between the proposed Project and the its underlying zoning classifications. The Project would not conflict with any development regulations and design standards in the Zoning Ordinance, and there are no components of the Project's proposed Zone Change Amendment that would result in impacts not already evaluated and disclosed by this MND Addendum.

The Project also includes a Specific Plan Amendment to amend the Sycamore Canyon Business Park Specific Plan to change the land use subarea from industrial support to industrial to allow for warehouse development. Approval of the requested Specific Plan Amendment would eliminate any potential inconsistency between the proposed Project and its underlying permitted land use. The Project would not conflict with any development regulations and design standards in the Specific Plan, and there are no components of the Project's proposed Specific Plan Amendment that would result in impacts not already evaluated and disclosed by this MND Addendum.

Lastly, the Project would be subject to all applicable development standards of the City of Riverside Municipal Code, as well as applicable policies of the General Plan and Sycamore Canyon Business Park Specific Plan. Consistent with the findings of the Adopted MND, the proposed Project, including the design and improvement of the subject property, would be consistent with the goals, objectives and policies of the applicable City of Riverside General Plan and Sycamore Canyon Business Park Specific Plan; would be safe from potential cause or introduction of serious public health problems; and, would not conflict with any public interests in the subject property or adjacent lands. The Project site also is suitable for the type and intensity of development proposed. Based on the foregoing and consistent with the conclusion reached in the Adopted MND, the Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant. Therefore, the Project

would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

#### **5.1.12 Mineral Resources**

		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact	
XII. MINERAL RESOURCES. Would the project:						
a.	Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?				$\boxtimes$	
b.	Result in the loss of availability of a locally- important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				$\boxtimes$	

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

(Source: General Plan 2025 Figure – OS-1 – Mineral Resources)

#### **No Substantial Change from Previous Analysis:**

As evaluated in the Adopted MND, according to the California Geological Survey mapping, the Project site is located in the MRZ-3 Mineral Resource Zone (MRZ), which is defined as "Areas containing mineral deposits the significance of which cannot be evaluated from available data." No mineral extraction activities are currently taking place within the Project site and there are no specific areas within the City of Sphere Area which have locally-important mineral resource recovery sites. Consistent with the determination in the Adopted MND, the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

b) Would the proposed Project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

(Source: General Plan 2025 Figure – OS-1 – Mineral Resources)

#### No Substantial Change from Previous Analysis:

As evaluated in the Adopted MND, according to the California Geological Survey mapping, the Project site is located in the MRZ-3, which is defined as "Areas containing mineral deposits the significance of which

cannot be evaluated from available data." No mineral extraction activities are currently taking place within the Project site and there are no specific areas with the City of Sphere Area which have locally-important mineral resource recovery sites. Consistent with the determination in the Adopted MND, the proposed Project would not result in the loss of availability of a locally important resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

#### 5.1.13 Noise

		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
XIII. Noi	se. Would the project cause:				
a.	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?				
b.	Generation of excessive ground-borne vibration or ground-borne noise levels?			$\boxtimes$	
c.	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				

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

(Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contours, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, FPEIR Table 5.11-I – Existing and Future Noise Contour Comparison, Table 5.11-E – Interior and Exterior Noise Standards, Appendix G – Noise Existing Conditions Report, Title 7 – Noise Code, Project Specific Noise Study/Acoustical Analysis

prepared by Acoustics Group, Inc., Noise Impact Analysis prepared by Urban Crossroads, Inc. on October 18, 2021)

#### **No Substantial Change from Previous Analysis:**

The Project involves the construction and operation of one 115,526 s.f. warehouse building and associated improvements. To accomplish the Project, the vacant site and the location of an adjacent car wash facility would be developed, which would entail demolition of the car wash structure and its associated improvements. The Project Applicant would not construct the previously entitled commercial buildings, the vehicle fuel station or the vehicle wash facility, but would construct the previously entitled industrial building, at a larger size than previously approved. The proposed Project would not develop or disturb any additional property that was not assumed to be developed by the Adopted MND and the proposed Project's construction equipment and construction duration would be similar to the Project that was evaluated by the Adopted MND. The operational characteristics associated with the proposed warehouse use (e.g., traffic and traffic-related impacts) are less intensive than the commercial and industrial land uses evaluated for the Project site as part of the Adopted MND.

The Adopted MND concluded that per Implementation Tool N-1 of the General Plan 2025 Noise Element, the project was reviewed to ensure that noise standards and compatibility issues were addressed. The acoustical analysis for the project concluded that the project would meet the City's noise standards as set forth in Title 7 of the Municipal Code and was compliant with the Noise/Land Use Noise Compatibility Criteria Matrix (Figure N-10) of the Noise Element. Impacts were determined to be less than significant.

#### **Construction Noise Impact Analysis**

In 2021, Urban Crossroads prepared a Noise Impact Analysis (*Technical Appendix I*) for the proposed Project. To evaluate whether the proposed Project would generate potentially significant short-term noise levels at nearest receiver locations, a construction-related daytime noise level threshold of 80 dBA Leq is used as a reasonable threshold to assess the daytime construction noise level impacts. As disclosed in the Project's Noise Impact Analysis, according the City of Riverside Municipal Code Section 7.35.020 (G), Project construction noise levels are considered exempt from municipal regulation if noise level activity, associated with construction, repair, remodeling, or grading of any real property; provided a permit has been obtained from the City as required; do not take place between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday.

The Project's construction noise analysis shows that the nearest receiver locations would satisfy the reasonable daytime 80 dBA Leq significance threshold during Project construction activities as shown on Table 5-9, *Typical Construction Noise Analysis*. Therefore, the noise impacts due to Project construction noise is considered less than significant at all receiver locations. In addition, consistent with the project evaluated in the Adopted MND, per Implementation Tool N-1 of the General Plan 2025 Noise Element, the proposed Project was reviewed to ensure that noise standards and compatibility issues were addressed. The acoustical analysis concluded that the proposed Project would meet the City's noise standards as set forth in Title 7 of the Municipal Code and was compliant with the Noise/Land Use Noise Compatibility Criteria Matrix (Figure N-10) of the Noise Element.

	Construction Noise Levels (dBA Leq)					
Receiver Location <sup>1</sup>	Highest Construction Noise Levels <sup>2</sup>	Threshold <sup>3</sup>	Threshold Exceeded? <sup>4</sup>			
R1	68.3	80	No			
R2	78.3	80	No			
R3	69.2	80	No			

Table 5-9 Typical Construction Noise Analysis

#### **Operational Noise Impact Analysis**

To demonstrate compliance with local noise regulations, Urban Crossroads evaluated the Project-only operational noise levels against exterior noise level thresholds based on the City of Riverside exterior noise level standards at nearby noise-sensitive receiver locations. As shown on Table 5-10, *Operational Exterior Noise Level Compliance* shows that the operational noise levels associated with the proposed Project would satisfy the City of Riverside and the City of Moreno Valley daytime and nighttime exterior noise level standards at all nearby receiver locations. Therefore, the operational noise impacts are considered less than significant at the nearby noise sensitive receiver locations. In addition, the interior noise levels will satisfy the City of Riverside daytime and nighttime interior sound level limits for Receiver R2 located in the City of Riverside. The City of Moreno Valley does not maintain any interior noise level limits for receivers R1 and R3. Thus, the Project's operational noise impacts are considered to be less than significant at the nearby noise sensitive receivers. (Urban Crossroads, Inc., 2021c, p. 32)

Table 5-10 Operational Exterior Noise Level Compliance

Receiver Location <sup>1</sup>	City	Project Operational Noise Levels (dBA Leq) <sup>2</sup>		Noise Level Standards (dBA Leq) <sup>3</sup>		Noise Level Standards Exceeded? <sup>4</sup>	
Location		Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	Moreno Valley	38.1	37.0	55	45	No	No
R2	Riverside	35.8	34.5	55	45	No	No
R3	Moreno Valley	37.8	36.4	55	45	No	No

<sup>&</sup>lt;sup>1</sup>See Exhibit 7-A of *Technical Appendix I* for the receiver locations.

(Urban Crossroads, Inc., 2021c, Table 8-5)

<sup>&</sup>lt;sup>1</sup> Noise receiver locations are identified in Exhibit 9-A of *Technical Appendix I*.

<sup>&</sup>lt;sup>2</sup> Highest construction noise level calculations based on distance from the construction noise source activity to the nearest receiver locations as shown on Table 9-2 of *Technical Appendix I*.

<sup>&</sup>lt;sup>3</sup> Construction noise level thresholds as shown on Table 4-1 of *Technical Appendix I*.

<sup>&</sup>lt;sup>4</sup> Do the estimated Project construction noise levels exceed the construction noise level threshold? (Urban Crossroads, Inc., 2021c, Table 5-9)

<sup>&</sup>lt;sup>2</sup> Proposed Project operational noise levels as shown on Tables 8-3 and 8-4 of *Technical Appendix I*.

<sup>&</sup>lt;sup>3</sup> Exterior noise level standards, as shown on Table 4-1 of *Technical Appendix I*.

<sup>&</sup>lt;sup>4</sup> Do the estimated Project operational noise source activities exceed the noise level standards?

<sup>&</sup>quot;Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.

In addition, as shown in Table 5-11, *Daytime Project Operational Noise Level Increases* and Table 5-12, *Nighttime Operational Noise Location Increases*, the proposed Project would not generate a daytime and nighttime operational noise level increase at the nearby receiver locations. Therefore, the Project-related operational noise level increase would satisfy the operational noise level significance criteria (see Table 4-1 of *Technical Appendix I* for the significance criteria summary). Therefore, the incremental Project-related operational noise level increase would be less than significant at all receiver locations. (Urban Crossroads, Inc., 2021c, p. 33)

Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

Combined **Total Project** Reference Increase Receiver Measurement Project Project Increase Operational Ambient Criteria Location1 Location<sup>3</sup> and Increase<sup>6</sup> Criteria7 Noise Level<sup>2</sup> Noise Levels<sup>4</sup> Exceeded? Ambient<sup>5</sup> R1 38.1 L1 68.0 68.0 0.0 1 No R2 35.8 L4 50.2 50.4 0.2 5 No R3 37.8 L3 72.2 0.0 No 72.2

Table 5-11 Daytime Project Operational Noise Level Increases

Table 5-12 Nighttime Operational Noise Location Increases

Receiver Location <sup>1</sup>	Total Project Operational Noise Level <sup>2</sup>	Measurement Location <sup>3</sup>	Reference Ambient Noise Levels <sup>4</sup>	Combined Project and Ambient <sup>5</sup>	Project Increase <sup>6</sup>	Increase Criteria <sup>7</sup>	Increase Criteria Exceeded?
R1	38.1	L1	66.3	66.3	0.0	1	No
R2	35.8	L2	60.6	60.6	0.0	2	No
R3	37.8	L3	72.2	72.2	0.0	1	No

<sup>&</sup>lt;sup>1</sup> See Exhibit 7-A of *Technical Appendix I* for the receiver locations.

<sup>&</sup>lt;sup>1</sup> See Exhibit 7-A of *Technical Appendix I* for the receiver locations.

<sup>&</sup>lt;sup>2</sup> Total Project daytime operational noise levels as shown on Table 8-3 of *Technical Appendix I*.

<sup>&</sup>lt;sup>3</sup> Reference noise level measurement locations as shown on Exhibit 5-A of *Technical Appendix I*.

<sup>&</sup>lt;sup>4</sup> Observed daytime ambient noise levels as shown on Table 5-1 of *Technical Appendix I*.

<sup>&</sup>lt;sup>5</sup> Represents the combined ambient conditions plus the Project activities.

<sup>&</sup>lt;sup>6</sup> The noise level increase expected with the addition of the proposed Project activities.

<sup>&</sup>lt;sup>7</sup> Significance increase criteria as shown on Table 4-1 of *Technical Appendix I*. (Urban Crossroads, Inc., 2021c, Table 8-6)

<sup>&</sup>lt;sup>2</sup> Total Project daytime operational noise levels as shown on Table 8-3 of *Technical Appendix I*.

<sup>&</sup>lt;sup>3</sup> Reference noise level measurement locations as shown on Exhibit 5-A of *Technical Appendix I*.

<sup>&</sup>lt;sup>4</sup> Observed daytime ambient noise levels as shown on Table 5-1 of *Technical Appendix I*.

<sup>&</sup>lt;sup>5</sup> Represents the combined ambient conditions plus the Project activities.

<sup>&</sup>lt;sup>6</sup> The noise level increase expected with the addition of the proposed Project activities.

### b) Would the proposed Project cause generation of excessive ground-borne vibration or ground-borne noise levels?

(Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contours, FPEIR Table 5.11-G – Vibration Source Levels For Construction Equipment, Appendix G – Noise Existing Conditions Report, Project Specific Noise Study/Acoustical Analysis prepared by Acoustics Group, Inc., Noise Impact Analysis prepared by Urban Crossroads, Inc. on October 18, 2021)

#### **No Substantial Change from Previous Analysis:**

The Adopted MND concluded that the project evaluated by the Adopted MND was in compliance with the City's noise standards and found impacts related to groundborne vibration and groundborne noise levels as a result of the project to be less than significant.

In 2021 as part of the Noise Impact Analysis for the proposed Project, Urban Crossroads' analysis shows that construction equipment vibration levels would satisfy the building damage thresholds at all receiver locations. In addition, the typical construction vibration levels at the nearest sensitive receiver locations are unlikely to be sustained during the entire construction period but would occur rather only during times that heavy construction equipment is operating adjacent to the Project site perimeter. (Urban Crossroads, Inc., 2021c, p. 43, Table 9-5)

Construction and operational activities associated with the proposed Project would not result in the generation of excessive groundborne vibration or groundborne noise levels beyond what was evaluated and disclosed by the Adopted MND. Furthermore, construction-related vibration is unlikely to be sustained during the entire construction period but would occur rather only during the times that heavy construction equipment is operating adjacent to the Project site perimeter. Table 5-13, Construction Equipment Vibration Levels, presents the expected typical construction equipment vibration levels at the nearest receiver locations. At distances ranging from 43 feet to 598 feet from typical Project construction activities (at the Project site boundary), construction vibration levels are estimated to range from 45.6 to 79.9 VdB and will remain below the FTA Transit Noise and Vibration Impact Assessment Manual maximum acceptable vibration criteria of 80 VdB for daytime residential uses at all receiver locations. Therefore, the Project-related vibration impacts are considered less than significant during typical construction activities at the Project site. Moreover, the vibration levels reported at the sensitive receiver locations are unlikely to be sustained during the entire construction period but will occur rather only during the times that heavy construction equipment is operating adjacent to the Project site perimeter. (Urban Crossroads, Inc., 2021c, p. 43) Accordingly, the Project would not result in generation of excessive groundborne vibration or groundborne noise levels, and impacts would be less than significant. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

<sup>&</sup>lt;sup>7</sup> Significance increase criteria as shown on Table 4-1 of *Technical Appendix I*. (Urban Crossroads, Inc., 2021c, Table 8-7)

Receiver Vibration Levels (VdB)2 Distance to Receiver Construction Threshold Threshold Highest Small Jack-Loaded Large Location<sup>1</sup> Activity VdB<sup>3</sup> Exceeded?4 Vibration Bulldozer hammer **Trucks** Bulldozer (Feet) Levels R1 515' 18.6 39.6 46.6 47.6 47.6 80 No R2 43' 50.9 71.9 78.9 79.9 79.9 80 No R3 598' 37.6 44.6 45.6 80 16.6 45.6 No

Table 5-13 Construction Equipment Vibration Levels

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

(Source: General Plan 2025 Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contour, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, Airport Land Use Commission Riverside County, ALUC Review dated April 8, 2021 (File No. ZAP1452MA21)

#### No Substantial Change from Previous Analysis:

Consistent with the project evaluated within the Adopted MND, the Project site is located within Compatibility Zone B1 and Accidental Potential Zone 2 (APZ II) of the March Air Reserve Base/Inland Port Airport (MARB/IP Airport). The proposed Project was reviewed by the ALUC on April 8, 2021 to ensure that the Project is consistent with the compatibility zone as well as in compliance with the land use standards in the RCALUCP. Consistent with the findings of the Adopted MND, because the Project would be consistent with the ALUC, there are no components of the proposed Project that would affect existing aircraft or airport operations in the Project vicinity. As such, and consistent with the findings of the Adopted MND, the proposed Project would not expose people residing or working in the project area to excessive noise levels, and no impact would occur. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

<sup>&</sup>lt;sup>1</sup> Noise receiver locations are shown on Exhibit 9-A of *Technical Appendix I*.

<sup>&</sup>lt;sup>2</sup> Based on the Vibration Source Levels of Construction Equipment included on Table 9-4 of *Technical Appendix I*.

<sup>&</sup>lt;sup>3</sup> FTA Transit Noise and Vibration Impact Assessment Manual maximum acceptable vibration criteria as shown on Table 4-1 of *Technical Appendix I*.

<sup>&</sup>lt;sup>4</sup> Does the vibration level exceed the maximum acceptable vibration threshold? (Urban Crossroads, Inc., 2021c, Table 9-5)

#### 5.1.14 Population and Housing

		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact		
XIV. POP	XIV. POPULATION AND HOUSING. Would the project:						
a.	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?						
b.	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?						

a) Would the Project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

(Source: General Plan 2025 Table LU-3 – Land Use Designations, FPEIR Table 5.12-A – SCAG Population and Households Forecast, Table 5.12-B – General Plan Population and Employment Projections – 2025, Table 5.12-C – 2025 General Plan and SCAG Comparisons, Table 5.12-D - General Plan Housing Projections 2025)

#### **No Substantial Change from Previous Analysis:**

As stated in the Adopted MND, the project is in an urbanized area and does not propose new homes or businesses that would directly induce substantial population growth, and does not involve the addition of new roads or infrastructure that would indirectly induce substantial population growth. In addition, and consistent with the information presented in the Adopted MND, the Project site is located in close proximity to developed areas of the City and water and sewer service are available to serve land uses within the Project area, inclusive of the Project site, and roadways exist in the vicinity of the Project area. Therefore, the expansion or new construction of public facilities and utilities will be localized and not extend into distant undeveloped areas of the City. In addition, consistent with the or new construction of public facilities and utilities will be localized and not extend into distant undeveloped areas of the City. In addition, consistent with the Adopted MND and as evaluated in Threshold 5.15, Public Services, impacts on public services would be less than significant; thus, the public service provider's ability to provide services will not be reduced. Based on the foregoing analysis, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

### b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

(Source: Google Earth)

#### **No Substantial Change from Previous Finding:**

Consistent with the conditions that existed when the Adopted MND was prepared, the Project site consists of vacant, undeveloped land that does not contain residential housing. Therefore, consistent with the findings of the Adopted MND, the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. The Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as Previously identified and analyzed in the Adopted MND

#### 5.1.15 Public Services

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
XV. Public Services.				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for <u>fire protection</u> services?				$\boxtimes$
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?				$\boxtimes$
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable				$\boxtimes$

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
service ratios, response times or other performance objectives for <b>schools</b> ?				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for <u>parks</u> ?				$\boxtimes$
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?				$\boxtimes$

a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

(Source: FPEIR Table 5.13-B – Fire Station Locations, Table 5.13-C – Riverside Fire Department Statistics and Ordinance 5948 § 1)

#### No Substantial Change from Previous Analysis:

As stated in the adopted MND, adequate fire facilities and services are provided to serve this Project. Fire protection services to the proposed Project would be provided by the City of Riverside Fire Department (RFD), and the nearest RFD fire station (Station 13) occurs approximately 1.1 miles northwest of the Project site. Consistent with the Adopted MND, the proposed Project would be conditioned by the City to provide a minimum of fire safety and support fire suppression activities, including compliance with State and local fire codes, fire sprinklers, a fire hydrant system, paved access, and secondary access routes. Consistent with the finding of the Adopted MND, no impact would occur. The Project would not trigger the need to provide new or physically altered fire stations or other fire protection facilities. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project

would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

b) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?

(Source: General Plan 2025 Figure PS-8 – Neighborhood Policing Centers)

#### **No Substantial Change from Previous Analysis:**

Police protection services to the Project site would be provided by the Riverside Police Department. As stated in the adopted MND, adequate police facilities and services are provided to serve this Project. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Police Department practices, there will be no impact on the demand for additional police facilities or service. Consistent with the finding of the Adopted MND, no impact would occur. The Project would not trigger the need to provide new or physically altered police stations or other law enforcement facilities. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

c) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for <u>school</u> services?

(Source: FPEIR Figure 5.13-2 - RUSD Boundaries, Table 5.13-D - RUSD, Figure 5.13-3 - AUSD Boundaries, Table 5.13-E - AUSD, Table 5.13-G - Student Generation for RUSD and AUSD by Education Level, and Figure 5.13-4 - Other School District Boundaries)

#### No Substantial Change from Previous Analysis:

The Project is a non-residential use that would not involve the addition of any housing units that would increase numbers of school age children. Consistent with the Adopted MND, the proposed Project does not involve the construction of any residential dwelling units, and as such only would have an indirect potential to increase the demand for school services in the area. The Project applicant would be required to pay school impact fees to the local school district to offset the potential impacts of increased student enrollment. Pursuant to Senate Bill 50, payment of school impact fees constitutes complete mitigation for project-related impacts to school services. As such, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities. Consistent with the finding of the Adopted MND, no impact would occur. Therefore, the Project would not result in

any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

d) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?

(Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Parks Master Plan 2003, GP 2025 FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative)

#### **No Substantial Change from Previous Analysis:**

Consistent with the Adopted MND, the proposed Project is a non-residential use that would not involve the addition of any housing units that would increase the population. Therefore, there would be no impact on the demand for additional park facilities or services. Consistent with the Adopted MND, the proposed Project does not involve the construction of any park facilities or housing that would generate a demand for park facilities. Consistent with the finding of the Adopted MND, no impact would occur. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

e) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

(Source: General Plan 2025 Figure LU-8 – Community Facilities, FPEIR Figure 5.13-5 - Library Facilities, Figure 5.13-6 - Community Centers, Table 5.3-F – Riverside Community Centers, Table 5.13-H – Riverside Public Library Service Standards)

#### **No Substantial Change from Previous Finding:**

As stated in the Adopted MND, adequate public facilities and service such as libraries and community centers and are provided to serve this Project. Therefore, the Project would not result in the intensification of land use and there would be no impact on the demand for additional public facilities or services. Consistent with the finding of the Adopted MND, no impact would occur. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

#### 5.1.16 Recreation

		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
XVI. REC	REATION. Would the project:				
a.	Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				$\boxtimes$
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				$\boxtimes$

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

(Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Figure CCM-6 – Master plan of Trails and Bikeways, Parks Master Plan 2003, FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative, Table 5.14-D – Inventory of Existing Community Centers, Riverside Municipal Code Chapter 16.60 - Local Park Development Fees, Bicycle Master Plan May 2007)

#### No Substantial Change from Previous Analysis:

Consistent with the Adopted MND, the Project applicant will pay applicable Park Development Impact Fees to the City of Riverside Parks, Recreation and Community Services Department. Also, consistent with the Adopted MND, the proposed Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Consistent with the finding of the Adopted MND, no impact would occur. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

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

(Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Figure CCM-6 – Master plan of Trails and Bikeways, Parks Master Plan 2003, FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the

Riverside Renaissance Initiative, Table 5.14-D – Inventory of Existing Community Centers, Riverside Municipal Code Chapter 16.60 - Local Park Development Fees, Bicycle Master Plan May 2007)

#### **No Substantial Change from Previous Finding:**

Consistent with the Adopted MND, the Project applicant will pay applicable Park Development Impact Fees to the City of Riverside Parks, Recreation and Community Services Department. Also, consistent with the adopted MND, the proposed Project would not include recreational facilities or require the construction or expansion of recreational facilities that may have an adverse physical effect on the environment. Consistent with the finding of the Adopted MND, no impact would occur. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

#### 5.1.17 Transportation

		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
XVII. TRA	ANSPORTATION. Would the project:				
a.	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?				
b.	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?		$\boxtimes$		
C.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?				
d.	Result in inadequate emergency access?				$\boxtimes$

# a) Would the Project conflict with a program, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, FPEIR Figure 5.15-4 – Volume to Capacity (V/C) Ratio and Level of Service (LOS) (Typical 2025), Table 5.15-D – Existing and Future Trip Generation Estimates, Table 5.15-H – Existing and Typical Density Scenario Intersection Levels of Service, Table 5.15-I – Conceptual General Plan Intersection Improvement Recommendations, Table 5.15-J – Current Status of Roadways Projected to Operate at LOS E or F in 2025, Table 5.15.-K – Freeway Analysis

Proposed General Plan, Appendix H – Circulation Element Traffic Study and Traffic Study Appendix, Trip Generation Assessment prepared by Urban Crossroads, Inc., on May 18, 2021)

#### **No Substantial Change from Previous Analysis:**

The Adopted MND determined that roadway capacity is adequate to accommodate the projected traffic volumes of the Project and the Project would operate at better than the required LOS D with implementation of the conditions of approval, and MM-1 Traffic, listed below. Impacts were determined to be less than significant.

### MM-1 Traffic: The Project shall install a second eastbound left turn lane at the signalized intersection of Alessandro Boulevard and the Arco Station.

The proposed Project is consistent with the project described in the Adopted MND in terms of general circulation design, including the proposed shared driveway along the Project site frontage with Alessandro Boulevard. Operationally, the Project evaluated in the Adopted MND anticipated construction of a gasoline service station, shopping center, and manufacturing warehouse uses. The proposed Project would consist of one warehouse building in place of the commercial retail and manufacturing use evaluated in the 2018 Substantial Conformance modification.

In 2021, a Trip Generation Assessment was prepared for the proposed Project, which is included as *Technical Appendix J* to this MND Addendum. Table 5-14, *Trip Generation Comparison*, indicates that the Project's proposed manufacturing warehouse use is anticipated to generate a total of 1,414 fewer two-way trips per day with 35 fewer AM peak hour trips and 57 fewer PM peak hour trips as compared to the currently approved project. In addition, the Project would contribute fewer than 50 peak hour trips to any off-site intersections. Therefore, the proposed Project would result in reduced impacts to study area transportation facilities as compared to the project evaluated by the Adopted MND. Because the Project Applicant proposes the same circulation design as the Adopted MND and would generate less traffic trips than the project evaluated in the Adopted MND, the proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Consistent with the findings of the Adopted MND, impacts would be less than significant. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

Table 5-14 Trip Generation Comparison

	AM Peak Hour			PM Peak Hour			
Land Use <sup>1</sup>	In	Out	Total	In	Out	Total	Daily
Currently Approved Project	74	41	115	64	79	143	1,942
Proposed Project	62	18	80	26	60	86	528
Variance	-12	-23	-35	-38	-19	-57	-1,414

(Urban Crossroads, Inc., 2021d, Table 5)

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

(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, FPEIR Figure 5.15-4 – Volume to Capacity (V/C) Ratio and Level of Service (LOS) (Typical 2025), Table 5.15-D – Existing and Future Trip Generation Estimates, Table 5.15-H – Existing and Typical Density Scenario Intersection Levels of Service, Table 5.15-I – Conceptual General Plan Intersection Improvement Recommendations, Table 5.15-J – Current Status of Roadways Projected to Operate at LOS E or F in 2025, Table 5.15.-K – Freeway Analysis Proposed General Plan, Appendix H – Circulation Element Traffic Study and Traffic Study Appendix, Vehicle Miles Traveled Analysis prepared by Urban Crossroads, Inc. and dated March 15, 2021)

#### **No Substantial Change from Previous Analysis:**

CEQA Guidelines § 15064.3(b) includes specific considerations for evaluating a project's transportation impacts using a Vehicle Miles Travelled (VMT) measure, instead of evaluating impacts based on Level of Service (LOS) criteria, as required by California Senate Bill (SB) 743. LOS has been used as the basis for determining the significance of traffic impacts as standard practice in CEQA documents for decades, including at the time the Adopted MND was adopted in December 2015. In 2013, SB 743 was passed, which is intended to balance the need for LOS for traffic planning with the need to build infill housing and mixed-use commercial developments within walking distance of mass transit facilities, downtowns, and town centers, and to provide greater flexibility to local governments to balance these sometimes-competing needs. In January 2019, the Natural Resources Agency finalized updates to the CEQA Guidelines including the incorporation of the SB 743 modifications. The Guidelines' changes were approved by the Office of Administrative Law and are now in effect. As such, as of July 1, 2020, LOS can no longer be the basis for determining an environmental effect under CEQA, and the analysis of impacts to transportation is now based on VMTs.

As indicated in Table 5-14, the proposed Project would result in 1,416 fewer daily trips as compared to the project evaluated in the Adopted MND and would therefore not exceed the City's VMT threshold. (Urban Crossroads, Inc., 2021d, pp. 3-5). Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

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

(Source: Project Site Plans)

#### **No Substantial Change from Previous Analysis:**

The proposed Project is consistent with the project described in the Adopted MND in terms of general circulation design and providing a shared driveway along the Project site's frontage with Alessandro Boulevard. Consistent with the project evaluated in the Adopted MND, the Project would not result in or require major improvements to circulation facilities within the City and the geometrics of the Project's proposed access driveway is consistent with applicable City requirements. Additionally, the Project occurs in an area that is planned for long-term development with industrial uses, and the manufacturing

warehouse uses proposed as part of the Project would not represent an incompatible use. Because the Project would be consistent with the project evaluated in the Adopted MND in terms of circulation design and compatible use, the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), and no impact would occur. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

#### d) Would the Project result in inadequate emergency access?

(Source: City of Riverside Municipal Code, and Fire Code)

#### No Substantial Change from Previous Analysis:

The proposed Project would not involve substantial changes to the area's circulation system, and the Project would be served by a shared driveway along the Project site's frontage with Alessandro Boulevard. The Project's design is required to be reviewed by the RFD as part of the building permit issuance process. The Project accommodates a fire lane surrounding the proposed building, which would provide for adequate emergency access on the site. Because the Project's circulation design would provide adequate fire lane access and would comply with the RFD, the Project would not result in inadequate emergency access, and no impact would occur. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

#### **5.1.18 Tribal Cultural Resources**

		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>XVIII. TRIBAL CULTURAL RESOURCES.</b> Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defines in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
а.	Listed or eligible for listing in the California Register of Historical resources or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or;		$\boxtimes$		
b.	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying for the criteria set forth in (c) of Public				

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				

a) Would the proposed Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defines in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical resources or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

(Source: AB-52 Native Americans: California Environmental Quality Act — California Legislative Information)

#### No Substantial Change from Previous Analysis:

The above-listed threshold was added to Appendix G to the CEQA Guidelines pursuant to AB 52. AB 52 was signed into law in 2014 while the Adopted MND was adopted in January 2016. AB 52 requires tribal consultation for certain development projects and applies only to projects that have a notice of preparation or notice of negative declaration or mitigated negative declaration filed on or after July 1, 2015. As demonstrated by the analysis herein, the proposed Project is fully within the scope of analysis of the Adopted MND, and the Project would not trigger any of the conditions described in § 15162 of the CEQA Guidelines calling for the preparation of a subsequent EIR or MND. As such, an Addendum to the Adopted MND has been prepared for the Project pursuant to § 15164 of the CEQA Guidelines, and the Project would not require a notice of preparation or notice of negative declaration or mitigated negative declaration. Therefore, the provisions of AB 52 are not applicable to the Project. Refer also to the discussion and analysis of potential impacts to cultural resources provided herein in Subsection 5.1.5, which concludes that with implementation of applicable mitigation measures (i.e., MM CR 1 and MM CR 2) from the Adopted MND, Project impacts to cultural resources, including tribal cultural resources, would be less than significant. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

b) Would the proposed Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defines in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial

evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1? (In applying for the criteria set forth in (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)

(Source: AB-52 Native Americans: California Environmental Quality Act — California Legislative Information)

#### No Substantial Change from Previous Analysis:

The above-listed threshold was added to Appendix G to the CEQA Guidelines pursuant to AB 52. AB 52 was signed into law in 2014 while the Adopted MND was adopted in January 2016. AB 52 requires tribal consultation for certain development projects and applies only to projects that have a notice of preparation or notice of negative declaration or mitigated negative declaration filed on or after July 1, 2015. As demonstrated by the analysis herein, the proposed Project is fully within the scope of analysis of the Adopted MND, and the Project would not trigger any of the conditions described in § 15162 of the CEQA Guidelines calling for the preparation of a subsequent EIR or MND. As such, an Addendum to the Adopted MND has been prepared for the Project pursuant to § 15164 of the CEQA Guidelines, and the Project would not require a notice of preparation or notice of negative declaration or mitigated negative declaration. Therefore, the provisions of AB 52 are not applicable to the Project. Refer also to Response (a)(ii) above.

The above-listed threshold was added to Appendix G to the CEQA Guidelines pursuant to AB 52. AB 52 was signed into law in 2014 while the Adopted MND was adopted in January 2016. AB 52 requires tribal consultation for certain development projects and applies only to projects that have a notice of preparation or notice of negative declaration or mitigated negative declaration filed on or after July 1, 2015. As demonstrated by the analysis herein, the proposed Project is fully within the scope of analysis of the Adopted MND, and the Project would not trigger any of the conditions described in § 15162 of the CEQA Guidelines calling for the preparation of a subsequent EIR or MND. As such, an Addendum to the Adopted MND has been prepared for the Project pursuant to § 15164 of the CEQA Guidelines, and the Project would not require a notice of preparation or notice of negative declaration or mitigated negative declaration. Therefore, the provisions of AB 52 are not applicable to the Project. Refer also to the discussion and analysis of potential impacts to cultural resources provided herein in Section 5.1.5 from the Adopted MND, Project impacts to cultural resources, including tribal cultural resources, would be less than significant. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

#### 5.1.19 Utilities and Service Systems

		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:					
a.	Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?			$\boxtimes$	
b.	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?				$\boxtimes$
C.	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				$\boxtimes$
d.	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				×
a.	Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?				$\boxtimes$

a) Would the proposed Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?

(Source: General Plan 2025 Table PF-1 – RPU PROJECTED DOMESTIC WATER Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, Table PF-3 – Western Municipal Water District Projected Domestic Water Supply (AC-FT/YR), RPU, FPEIR Table 5.16-G – General Plan Projected Water Demand for RPU Including Water Reliability for 2025, Table 5.16-I - Current and Projected Water Use WMWD, Table 5.16-J - General Plan Projected Water Demand for WMWD Including Water Reliability 2025, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area & Table 5.16-L - Estimated Future Wastewater Generation for the Planning Area Served by WMWD, Figure 5.16-4 – Water

Facilities and Figure 5.16-6 – Sewer Infrastructure and Wastewater Integrated Master Plan and Certified EIR.)

#### **No Substantial Change from Previous Analysis:**

The proposed Project is consistent with the project described in the Adopted MND in terms of utility provision and demand. Specifically, there would be no major changes in the Project's proposed utility connections. Impacts associated with the Project's proposed utility connections have been evaluated throughout this Addendum to the Adopted MND, and were evaluated as part of the Adopted MND. There are no components of the Project's proposed utility connections that would result in impacts to the environment that have not already been addressed and, where necessary, mitigated to the maximum feasible extent. Because the Project would be consistent with the project evaluated in the Adopted MND in terms of utility provision and demand, the Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

# b) Would the proposed Project have sufficient water supplies available to serve the project and reasonably foreseeable development during normal, dry, and multiple dry years?

(Source: FPEIR Figure 5.16-3 – Water Service Areas, Figure 5.16-4 – Water Facilities, Table 5.16-E – RPU Projected Domestic Water Supply (AC-FT/YR, Table 5.16-F – Projected Water Demand, Table 5.16-G – General Plan Projected Water Demand for RPU including Water Reliability for 2025, Table 5.16-H – Current and Projected Domestic Water Supply (acre-ft/year) WMWD Table 5.16-I Current and Projected Water Use WMWD, Table 5.16-J – General Plan Projected Water Demand for WMWD Including Water Reliability 2025, RPU Master Plan, EMWD Master Plan, WMWD Master Plan, Highgrove Water District Master Plan)

#### **No Substantial Change from Previous Analysis:**

Consistent with the finding of the Adopted MND, water service is available to serve the proposed Project subject to the payment of applicable connection charges and/or fees; provision and construction of standard connections, extensions, and installations of facility infrastructure in accordance with Department of Public Utilities standards, specifications, and policies; the rules and regulations of the California Public Utilities Commission and California Health Services; and implementation of the City-wide program for the completion of incremental expansions to facilities for planned water supply, treatment, and storage. Accordingly, there would be sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as Previously identified and analyzed in the Adopted MND.

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

(Source: FPEIR Figure 5.16-5 - Sewer Service Areas, Figure 5.16-6 -Sewer Infrastructure, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area, Table 5.16-L - Estimated Future Wastewater Generation for the Planning Area Served by WMWD, Wastewater Integrated Master Plan and Certified EIR)

#### **No Substantial Change from Previous Analysis:**

The proposed Project is consistent with the project described in the Adopted MND in terms of wastewater conveyance and treatment. Consistent with the finding of the Adopted MND, sanitary sewer service is available to serve the proposed Project subject to the payment of applicable connection charges and/or fees; provision and construction of standard connections, extensions, and installations of facility infrastructure in accordance with Department of Public Utilities standards, specifications, and policies; and the rules and regulations of the California Public Utilities Commission and California Health Services. Accordingly, and consistent with the finding of the Adopted MND, the proposed Project would not result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

d) Would the Project generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

(Source: FPEIR Table 5.16-A — Existing Landfills and Table 5.16-M — Estimated Future Solid Waste Generation from the Planning Area, CalRecycle — El Sobrante Landfill, Badlands Landfill, and Lamb Canyon Landfill)

#### No Substantial Change from Previous Analysis:

The Project would be served by either the El Sobrante Landfill, Badlands Landfill, and/or Lamb Canyon Landfill. As determined in the Adopted MND, adequate landfill capacity would exist to serve the Project because these landfills have an excess of approximately 65,932,830, 18,651,201 tons, and 19,692,703 tons of solid waste, respectively. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

e) Does the Project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

(Source: California Integrated Waste Management Board 2002 Landfill Facility Compliance Study)

#### **No Substantial Change from Previous Analysis:**

Consistent with the project evaluated in the Adopted MND, the Project Applicant would be required to comply with the City of Riverside's waste reduction programs pursuant to the State's Integrated Waste Management Act (IWMA). Project-generated solid waste would be conveyed to either the El Sobrante Landfill, Badlands Landfill, and/or Lamb Canyon Landfill. These landfills are required to comply with federal, State, and local statutes and regulations related to solid waste. Mandatory compliance with federal, State, and local statues also would reduce the amount of solid waste generated by the proposed Project and diverted to landfills, which in turn will aid in the extension of the life of the El Sobrante Landfill, Badlands Landfill, and/or Lamb Canyon Landfill. There are no components of the proposed Project with the potential to conflict with federal, State, or local management or reduction statutes and regulations related to solid waste. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

#### 5.1.20 Wildfire

		Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
	<b>XX. WILDFIRE.</b> If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:			erity zones,	
a.	Substantially impair an adopted emergency response plan or emergency evacuation plan?				$\boxtimes$
b.	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				$\boxtimes$
C.	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				$\boxtimes$
d.	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				×

- a) Would the proposed Project substantially impair an adopted emergency response plan or an emergency evacuation plan?
- b) Due to slope, prevailing winds, and other factors, would the proposed Project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- c) Would the proposed Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- d) Would the proposed Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

(Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas, GIS Map Layer VHFSZ 2010)

#### **No Substantial Change from Previous Analysis:**

Although not originally analyzed in the Adopted MND, the Project site is not located near any wildland fire hazard zones, and the Project site is not located within or near a state responsibility area. The building proposed as part of the Project would be required to contain appropriate fire suppression measures, such as fire sprinklers, consistent with the City of Riverside's building code requirements. There are no components of the Project that would result in increased risk due to fire hazards, either on or off site, and the Project is not required to maintain fire-related infrastructure that could exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. The Project site is not identified as part of any emergency response plans or emergency evacuation plans, and the Project would accommodate appropriate fire department access around the proposed building. Accordingly, there would be no impacts associated with wildland fire hazards. Therefore, the Project would not result in any new impacts, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

#### 5.1.21 Mandatory Findings of Significance

		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
XX. MAN	IDATORY FINDINGS OF SIGNIFICANCE				
a.	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-		$\boxtimes$		

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?				
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		$\boxtimes$		

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

(Source: General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, and Habitat Assessment, FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas, Figure 5.5-1 - Archaeological Sensitivity, Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Appendix D, Title 20 of the Riverside Municipal Code, Cultural Resources Survey prepared by Brian F. Smith and Associates on February 16, 2021)

#### No Substantial Change from Previous Analysis:

The Project's potential impacts to biological resources and cultural resources are evaluated herein, which conclude that with the implementation of the mitigation measures identified by the Adopted MND, impacts to biological and cultural resources would be reduced to below a level of significance. As such, with mitigation, the Project does not have the potential to substantially degrade the quality of the

environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND

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

(Source: FPEIR Section 6 – Long-Term Effects/ Cumulative Impacts for the General Plan 2025 Program)

#### **No Substantial Change from Previous Analysis:**

The Project's potential cumulatively-considerable impacts have been evaluated throughout this MND Addendum and in the analysis and discussions contained in the Adopted MND. Where cumulatively-considerable impacts were identified, appropriate and feasible mitigation measures were adopted to reduce potential impacts to the maximum feasible extent. There are no components of the proposed Project that would result in new or increased cumulatively-considerable impacts. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

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

(Source: FPEIR Section 5 – Environmental Impact Analysis for the General Plan 2025 Program)

#### No Substantial Change from Previous Analysis:

The Project's potential to result in adverse effects to human beings has been evaluated throughout this MND Addendum and in the discussion and analysis contained in the Adopted MND. Where significant impacts have been identified, feasible mitigation measures have been imposed on the Project to reduce potential adverse effects to human beings to the maximum feasible extent. There are no components of the proposed Project that would result in increased substantial adverse effects on human beings beyond what was evaluated, disclosed, and mitigated to the maximum feasible extent by the Adopted MND. Therefore, the Project would not result in any new impacts not already analyzed in the Adopted MND, and the Project would not increase the severity of a significant impact as previously identified and analyzed in the Adopted MND.

### 5.2 <u>EARLIER ANALYSES</u>

Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration as per California Code of Regulations, § 15063(c)(3)(D). In this case, a brief discussion should identify the following:

Earlier Analyses Used, if any: P14-0841, P14-0842, P14-0843, P14-0844, P14-0846 & P14-0847 Mitigated Negative Declaration

Location: City of Riverside

Community & Economic Development Department – Planning Division

3900 Main Street, 3<sup>rd</sup> Floor

Riverside, CA 92522

### 6.0 References

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(HMC, 2020)	Hazard Management Consulting, 2020. Phase I Environmental Site
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	000-28, and 2632-500-63 Riverside, CA 92508. December 14, 2020.
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	Management Plan 2610 Alessandro. March 12, 2021. Technical Appendix H2.
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Inc., 2021b)	Assessment. May 18, 2021. Technical Appendix J.
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(Urban Crosssroads,	Urban Crossroads, 2021d. Alessandro Corporate Center Trip Generation
Inc., 2021b)	Assessment. May 18, 2021. Technical Appendix J.
<b>Documents and Websit</b>	tes consulted in Preparation of this Addendum to MND
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Addendum to Mitigated Negative Declaration Planning Case No. PR2020-000519

### 7.0 Mitigation Monitoring and Reporting Program

IMPACT CATEGORY	MITIGATION MEASURES	IMPLEMENTATION TIMING	RESPONSIBLE MONITORING PARTY <sup>1</sup>	MONITORING/REPORTING METHOD
Air Quality	MM Air 1: To reduce diesel emissions associated with construction, construction contractors shall provide temporary	Prior to issuance of grading and/or building	Building & Safety Division	Proof of power source to be provided
	electricity to the site to eliminate the need for diesel-powered electric generators, or provide evidence that electrical	permits.	Public Works Department	from electric service provider.
	hook ups at construction sites are not cost effective or feasible.			
	MM Air 2: To reduce construction related particulate matter air quality impacts of City projects the following measures	Prior to issuance of individual grading	Public Works Department	Construction Inspection.
	shall be required:	and/or building permit.		
	1. the generation of dust shall be controlled as required by the AQMD;			
	2. grading activities shall cease during periods of high winds (greater than 25 mph);	The plan for traffic control shall be		
	3. trucks hauling soil, dirt or other emissive materials shall have their loads covered with a tarp or other protective cover	submitted with the grading and/or building		
	as determined by the City Engineer; and	plans.		
	4. the contractor shall prepare and maintain a traffic control plan, prepared, stamped and signed by either a licensed			
	Traffic Engineer or a Civil Engineer. The preparation of the plan shall be in accordance with Chapter 5 of the latest			
	edition of the Caltrans Traffic Manual and the State Standard Specifications. The plan shall be submitted for approval,			
	by the engineer, at the preconstruction meeting. Work shall not commence without an approved traffic control plan.			
Cultural	MM CR 1: At least 30 days prior to beginning Project construction, the Project Applicant shall contact the Tribes of	Site-Specific Environmental Review and/or	Planning Division	Compliance with Project Conditions
Resources	grading, excavation, and the monitoring program and, if a Cultural Resources Treatment and Monitoring Agreement has	prior to the issuance of a demolition,		of Approval.
	not been developed, to develop a Cultural Resources Treatment and Monitoring Agreement between the Applicant and	grading and/or building permit.	Public Works Department	
	the Tribes. The Agreement shall address the treatment of known cultural resources, the designation, responsibilities,			
	and participation of professional Native American Tribal monitors during grading, excavation and ground disturbing			
	activities; project grading and development scheduling; terms of compensation for the monitors; and treatment and			
	final disposition of any cultural resources, sacred sites, and human remains discovered on the site.			
	MM CR 2: If inadvertent discoveries of subsurface archaeological/cultural resources are discovered during grading, the	Site-Specific Environmental Review and/or	Planning Division	Compliance with Project Conditions
	developer, the project archaeologist, and the Tribe(s) shall assess the significance of such resources and shall meet and	prior to the issuance of a demolition,		of Approval.
	confer regarding the mitigation for such resources. Pursuant to Calif. Pub. Res. Code 21083.2(b) avoidance is the	grading and/or building permit.	Public Works Department	
	preferred method for archaeological resources. If the developer, the project archaeologist, and the Tribe(s) cannot			
	agree on the significance or the mitigation for such resources, these issues will be presented to the Community			
	Development Director for decision. The Community Development Director shall make the determination based on the			
	provisions of CEQA with respect to the archaeological resources and shall take into account the religious beliefs,			
	customs, and practices of the Tribe(s). Notwithstanding any other rights available under the lay, the decision of the			
	Community Development Direct shall be appealable to the Planning Commission and/or City Council.			
Traffic	MM-1 Traffic: The project shall install a second eastbound left turn lane at the signalized intersection of Alessandro	Site-Specific Environmental Review.	Planning Division	Compliance with Project Conditions
	Boulevard and the Arco Station (shown as intersection #4 within the Traffic report).			of Approval.
			Public Works Department	

<sup>&</sup>lt;sup>1</sup> All Agencies are City of Riverside Departments/Divisions unless otherwise noted.