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April 30, 2018

Riverside County Board of Supervisors  
Clerk of the Board  
4080 Lemon Street.  
Riverside, CA 92501

Dear Honorable Supervisors:

**Re: Item 18.1 - Opposition to GPA 1151 & 1152 - Knox Business Park Building D & E  
Project - Final Environmental Impact Report No. 546**

The Rural Association of Mead Valley (RAMV.org) representing over 19,000 residents of the rural community of Mead Valley is adamantly opposed to General Plan Amendment 1151 & General Plan Amendment 1152 and zone changes 7873 & 7872 that proposes to build two logistics high-cube Industrial Warehouses on 58.6 acres of land directly adjacent to rural homes along Redwood Drive in Mead Valley. These two warehouses will generate over 800 truck trips per day. Many of these trucks will be using Decker Road to Markham to Cajalco which is the fastest and shortest route to the I-91. The project is located south of Oleander Avenue, north of Redwood Drive, east of Day Street, and west of Harvill Avenue. Ellsworth Street / Decker Road transects the Project site.

This project is an intrusion into our rural community, threatens our rural lifestyle and quality of life. Mead Valley Area Plan - Land use element clearly show the proposed warehouse Project to be located within the Business Park land use area of the Plan. Business Park land use acts as a buffer between Industrial and residential land uses recreating more compatible land uses.

Planning Commission speaker slips. The majority of the people who filled out speaker slips do not live in Mead Valley and yet checked the box stating that they were neighbors to the project (See Attachment).

**There is another choice. RAMV.org recommends the NO Project Alternative – to leave the area as open space and protect the wildlife corridor. The second choice would be to retain the existing land use of Business Park and Rural Residential.** Business Park zoning would allow smaller businesses that create real jobs, sales taxes and operate from 8:00am to 6:00 pm not 24-7. This zoning follows the Riverside County General Plan – Mead Valley Area Plan and vision for the area. Any buildings should allow for a substantial buffer (1000 ft) between rural homes and Industrial land uses. The Business Park alternative would reduce the operational effects of the project substantially reducing truck trips, air pollution, traffic, noise, truck idling times, diesel particulate PM and NOx emissions, off-site parking, prostitution and increased crime.

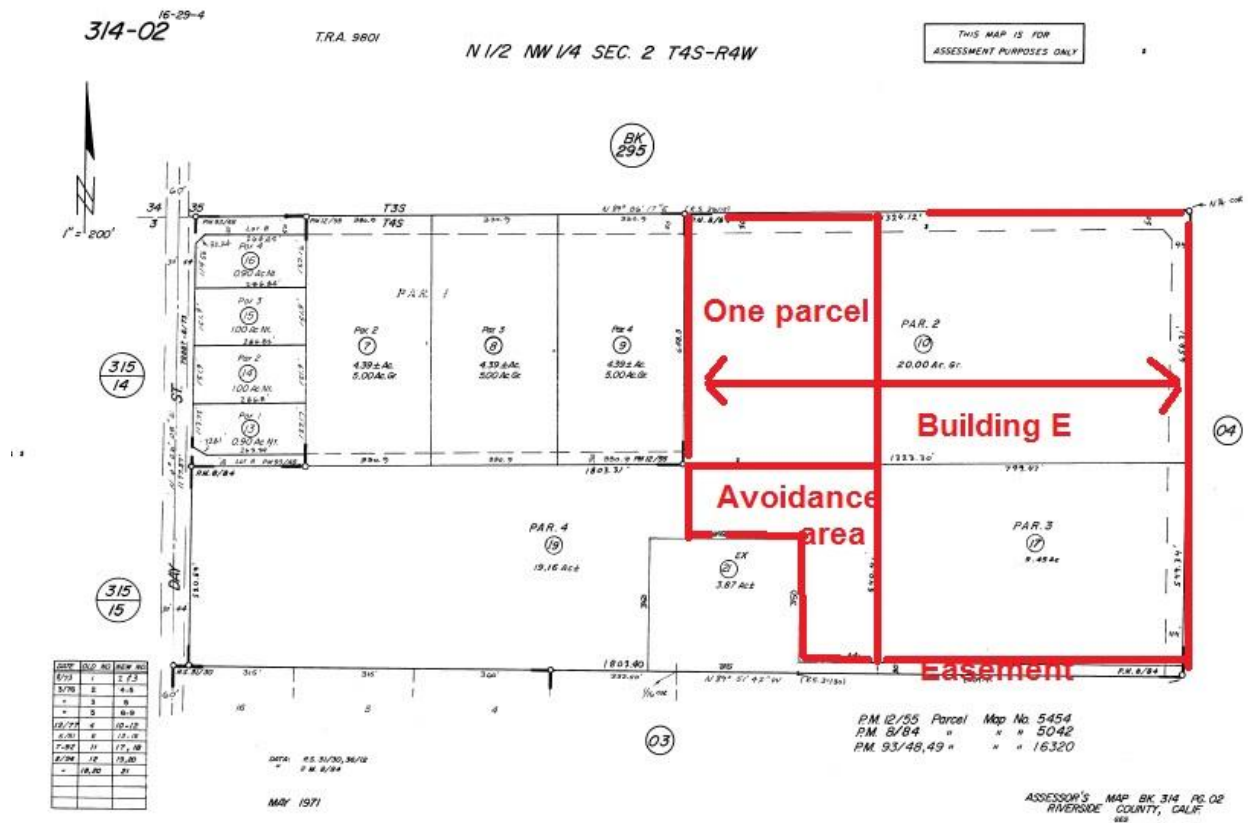
5/1/18 18-1  
2018-5-139505

New Conditions of Approval and changes were available to the public on April, 26, 2018. There are so many inconsistencies, errors and omissions in the staff report and accompanying documents that it is impossible to understand what is really being proposed today.

Request that Parcel Maps be removed and yet there are easements, avoidance areas and lot line adjustments that cannot be over looked. Ord. 460 requirements cannot be ignored.

Parcel: 10  
Check Digit: 5

the page/block number, and the third segment identifies the parcel number



"Conditions from Transportation were revised to address alternative secondary access as required by the Tentative Parcel Map consistent with Ordinance No. 460 requirements and consistent with the areas analyzed in the project's EIR. The revisions to secondary access would require improvements.

(24' width of pavement) to Ellsworth Street south of the project site to Markham Street. Due to concerns from the nearby residents that improvements to this section of Ellsworth Street could allow for truck traffic to pass by to connect to Markham Street despite what mitigation measures are included in the EIR for truck traffic to be directed on Oleander, these improvements are understood to not be desirable from the nearby residents (or the applicant or staff) and is a result of a requirement of Ordinance No. 460. This condition is recommended for incorporation with

consideration of the Tentative Parcel Maps due to its requirement per Ordinance No. 460, but discussion is anticipated regarding this requirement and whether the applications for the Tentative Parcel Maps may be set aside to remove the requirement for improvements to Ellsworth Street south of the project site to Markham Street." (Memorandum, Planning Department April 2, 2018).

See Parcel Map for Building "E" that includes avoidance area, easement to access EMWD water reservoir, lot line adjustment, required by Ord. 460. Standard road with is 32' and is now being changed to 24'.

### **PM36950**

#### **"50. Transportation.7 – Off-Site Access 2**

The landowner/developer shall provide/acquire sufficient public off-site rights-of-way to provide for a paved access road to a paved County maintained road. Said access road shall be constructed with **a minimum of 24' 32'** of A.C. pavement within a 60' dedicated right-of-way in accordance with County Standard No. 106, Section A (**24'32'/60'**) at a grade and alignment as approved by the Transportation Department. Should the applicant fail to provide/acquire said off-site right-of-way, the map shall be returned for redesign. The applicant shall provide the appropriate environmental clearances for said off-site improvements prior to recordation or the signature of any street improvement plans.

Said off-site access road shall be the northerly **southerly** extension of Decker Road (Ellsworth Street) to Harley Knox Boulevard **Markham Street** and the easterly extension of Harley Knox Boulevard to a paved County maintained Harley Knox Boulevard.

**or as approved by the Director of Transportation.**

Air pollution for the Inland Empire is continuing to increase. Our area has some of the worst air pollution in the nation. The EIR states air pollution is improving , but the facts prove differently. <https://www.dailynews.com/2018/04/18/southern-california-has-some-of-the-worst-air-pollution-in-the-country-report-finds/>

Documented evidence of truck drivers behaving badly has occurred in Riverside and also at the warehouse at Harley Knox X Harvill X Oleander. Truck idling mitigation only applies once the trucks enter the facility. Trucks can idle for hours increasing air pollution dramatically in the area nearby and the region. Recent PE article describes the problems that residents face living near warehouses.

"The company has explained policies to drivers and met with the city, and "officials have monitored our site and since assured us that the entire matter has been resolved," the statement said.

At Staylor's request, a state Air Resources Board team visited in July and found **three lanes filled with up to 25 trucks trying to get into Smart & Final**, according to an email from Nancy O'Connor, field enforcement manager for the air board.

Though the waiting trucks ran their engines for 15 minutes to an hour, no citations were given because state rules against idling apply only within 100 feet of a residence.

O'Connor wrote that the team saw other problems "such as drivers urinating on the street and littering" but that those were outside the board's jurisdiction."

<https://www.pe.com/2016/12/11/misbehaving-truck-drivers-draw-complaints-in-riverside-warehouse-district/>

Business Park zoning acts as a buffer between Very Low Density Residential A-1-1 and RR Rural Residential Zoning to the south and west of the project and Light Industrial along Harvill Ave.

"Business Park (BP) - The Business Park land use designation allows for employee-intensive uses, including research and development, technology centers, corporate and support office uses, clean industry and supporting retail uses. Building intensity ranges from 0.25 to 0.6 FAR" (Riverside County General Plan – Mead Valley Area Plan).

1. Recent changes to the Conditions of Approval just came out Thursday afternoon for this project.

a. Federal Migratory Bird Act - Burrowing Owl mitigation was struck out. Specific provisions in the statute include:

- Establishment of a Federal prohibition, unless permitted by regulations, to "pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention . . . for the protection of migratory birds . . . or any part, nest, or egg of any such bird." (16 U.S.C. 703)

A recent study last year showed no burrowing owls located on the Project site and yet I have observed two nesting pairs on this site. See picture that I took August 2017 after the study was performed. Saturday, April 28, 2018, I observed another pair of nesting burrowing owls on this site. In 2015 a burrowing owl survey did find burrowing owls. Burrowing Owls have been plentiful in this location for over 30 years. The EIR and Conditions of Approval are required to follow state and federal law. Burrowing Owls are a species of Special Concern.



Nesting Burrowing Owl pictures on the project site taken July 2017.

2. Conditions of Approval state: Also attached is the comment letter received yesterday from Debbie Walsh. No such letter is attached. I requested this letter be made part of the public record. The letter was emailed to Russell Brady and the Secretary of the Planning Commission.

3. Conditions of Approval regarding secondary access (Decker / Ellsworth Street). Residents do not want 800 truck trips per day going down Decker Road in front of their homes, whether the county is required to pave Decker or not these trucks will use Decker Road.

4. There are occupied homes located within the Industrial Corridor. On the project site Building "D" is a double wide mobile home which has been occupied for over 20 years. At the corner of Oleander X Harvill is a mobile home, garage and outbuildings occupied for over 30 years. Along Cajalco Road near Seaton are a number of homes. Along Patterson south of Cajalco are a number of homes. Statements by the Planning Commission that no homes were located within the Industrial Corridor are not accurate.

#### ~~60.Planning-EPD.2~~

~~Prior to the issuance of a grading permit, a Burrowing Owl Relocation Plan shall be prepared if burrowing owls are determined to be occupying the project site at the time of the 30-Day pre-construction burrowing owl survey. The relocation plan shall comply with the Burrowing Owl Species Account Objectives within Appendix B of Volume 2 - The MSHCP Reference Document. Passive relocation shall not be allowed at the project site.~~

~~If it is determined during the 30-day preconstruction survey that burrowing owls have colonized the project site prior to the initiation of construction, the project proponent will immediately inform the Riverside County Biologist, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, and the Regional Conservation Authority, and would need to retain a Biologist that holds a Memorandum of Understanding with the County of Riverside to prepare a Burrowing Owl Protection and Relocation Plan for approval by the County of Riverside and Wildlife Agencies prior to initiating ground disturbance. The relocation plan will include the following:~~

~~-The locations of the nests and the owls proposed for relocation.~~

~~-The locations of the proposed relocation sites.~~

~~-The numbers of adult owls and juveniles proposed for relocation.~~

~~-The time of year when relocation is proposed to take place.~~

~~-The name of the biologist proposed to supervise the relocation, and the details of his/her previous experiences capturing, handling, and relocating burrowing owls, including the outcomes of their previous relocation efforts (survival/mortality rates and site-fidelity rates of relocated owls), and relevant permits held.~~

~~-A detailed description of the proposed method of capture, transport, and acclimation of the current project's owls on the proposed relocation site.~~

~~-A detailed description of relocation site preparations (e.g., the design and dimensions of the artificial release burrows and hacking cage, duration of hacking activities (including food and water provision).~~

~~-Description of the monitoring methods and monitoring duration to be employed to verify survival of the relocated owls and their long-term retention on the relocation site.~~

**Good Neighbor Guidelines For Siting New and/or Modified Warehouse/Distribution Facilities** <http://www.wrcog.cog.ca.us/DocumentCenter/View/318/Good-Neighbor-Guidelines-for-Siting-Warehouse-Distribution-Facilities-PDF>.

In 2005, a Regional Air Quality Task Force Policy Committee was set up to deal with the immense and growing air pollution problems created by the huge number of high cube warehouses coming into Mira Loma and Jurupa Valley being built next to homes.

John Tavaglione, Supervisor, District 2;  
John Field, Senior Deputy, Office of Supervisor John Tavaglione, District 2;  
Larry Dressel, Mayor, City of Beaumont  
Frank Hall, Council Member, City of Norco  
Ron Loveridge, Mayor, City of Riverside.

**Main Goals. Minimize exposure to diesel emissions to neighbors that are situated in close proximity to the warehouse/distribution center.**

Residents to this project have a 35' buffer between their back fence and the driveway along the southern portion of the warehouse. Claims that no semi trucks will use the driveway along the southern portion of the warehouse are not accurate. Residents are not living in a bubble. To assume that they will always be in their homes is unreasonable. In fact, children and their parents along Redwood Street frequently use their back yards. A warehouse just to the northeast, owned by this same developer, are allowing truck parking in a similar area designated for car parking. Trucks are parked in any available space as there are not enough warehouse truck parking spaces to accommodate all of the truck trailers this warehouse uses. Yard trucks are using diesel fuel instead of electric power. Yard trucks are seen frequently traveling down Harvill to the truck stop on Cajalco. The warehouse at Harvill X Oleander has three tenants.

Warehouses at Oleander X Decker are built on speculation and can accommodate two tenants each. With four tenants these warehouses would certainly have a higher chance of needing refrigerated hook-ups. Idling trucks are a real problem as they will be waiting to enter the facility along Oleander. Refrigerated trucks at the proposed warehouses will idle until they are unloaded and completely loaded which is far more than the 3 minutes allowed by CARB.

**Goal 2:**

**Eliminate diesel trucks from unnecessarily traversing through residential neighborhoods.** These two warehouses will be bringing 800 truck trips a day through our quiet rural neighborhoods using our two lane country roads and going past two elementary schools and a middle school near Cajalco Road and Clark Street.

Decker Road ends at Markham and goes up a steep grade with an "S" curve where a large number of accidents have occurred. K-rails line the street to protect homes from cars flying off of Markham.

The staff report states trucks will not use Decker Road, but it is required by Transportation as a secondary access. The County feels that weight limit signs will prevent these trucks from taking the shortest and fastest route to the I-91. Truck drivers know that the CHP must cite drivers and therefore they can ignore these signs.

**Goal 3. Eliminate trucks from using residential areas and repairing vehicles on the streets.**

Trucks are still parked along residential streets in Mead Valley. Who will cite them? We do not have enough Code Enforcement officers to take care of that task. Decker will become a truck parking area. Dirt fields will become truck parking lots as is currently seen on Oleander X Harvill south of warehouse at Harvill. No restrooms and attracting prostitutes into our area 24-7. Trucks idling for hours as the drivers sleep.

**Goal 4. Reduce and/or eliminate diesel idling within the warehouse/distribution center.**

Benefits:

1. Reduces exposure of diesel emissions to residences and other sensitive receptors.

Recommended Guidelines:

- Require the installation of electric hook-ups to eliminate idling of main and auxiliary engines during loading and unloading, and when trucks are not in use;
- Train warehouse managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks within the facility;
- Require signage that informs truck drivers of the California Air Resources Board (CARB) regulations (which include anti-idling regulations);
- Post signs requesting that truck drivers turn-off engines when not in use;
- Restrict idling within the facility to less than ten (10) minutes

Who will be enforcing these measures? No one inside the warehouse will be monitored to make sure that trucks are idling for 3 minutes or 5 minutes.

Developer refuses to install electric hook-ups to prevent excessive idling and also refuses to put in adequate buffering between rural homes and this warehouse. Residents will be living 35' from a massive warehouse with over 800 truck trips per day. WRCOG good neighbor policy highly recommends a 1,000 foot buffer from the property line. Claims by the developer that there is a 191' buffer are not accurate as the measurement the developer is using is from the warehouse building to the first house. Not from the property line to the warehouse.

**Goal 5:**

**Establish a diesel minimization plan for on- and off-road diesel mobile sources to be implemented with new projects.**

Encourage warehouse/distribution center fleet owners to replace their existing diesel fleets with new model vehicles and/or cleaner technologies, such as electric or compressed natural gas;

- Require all warehouse/distribution centers to operate the cleanest vehicles available;
- Provide incentives for warehouses/distribution centers and corporations which partner with trucking companies that operate the cleanest vehicles available;
- Encourage the installation of clean fuel fueling stations at facilities

Require the posting of signs outside of the facility providing a phone number where neighbors can call if there is an air quality issue

Statements that these warehouses will use 2010 or newer trucks also goes back to monitoring.

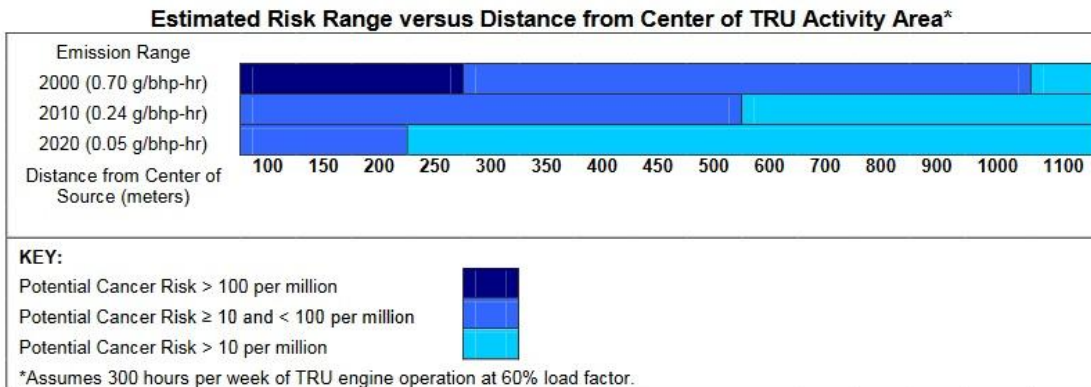


Warehouses nearby allow older trucks (paint falling off) to use their facilities with COA requiring 2010 or newer trucks.

Why do we suggest buffer zones?

The reduction of potential cancer risk levels at locations where TRUs operate is a direct result of the reduction of diesel PM emissions. Figure 1-1 compares the cancer risk range at various distances assuming 300 hours of TRU activity per week. For year 2000, the current fleet average emission rate of 0.7 g/bhp-hr was used. In 2020, the statewide fleet PM emission rate would be reduced 92 percent from the 2000 baseline year to 0.05 g/bhp-hr. Figure 1-1 below illustrates the significant reduction of the estimated near source risk as the diesel PM emission rate is reduced from the current fleet emission rate to the much lower emission rate in 2020.<sup>4</sup>

Figure 1-1



The County of Riverside was a big part in creating the WRCOG Good Neighbor Policy Guidelines and yet we are being told they do not apply "guidelines only". These policies are not even being used as guidelines anymore. Does Riverside County no longer care about the residents who live in Riverside County in regards to their health, safety and welfare. This warehouse Project far exceeds AQMD regional thresholds for NOx and VOC and yet these warehouse over 1.1 million sq. ft are right in our backyard. No buffer whatsoever. A few trees planted along the back wall. The very minimum needed by the developer. This will not stop the noise, air pollution, truck traffic, crime and prostitution that comes with warehouses and high truck traffic. Over 800 additional semi trucks traveling to Cajalco Road, Harley Knox Blvd. and Harvill Ave. each day. These roads are already gridlocked during commute times. Harley Knox off ramp is over capacity and trucks are backing up onto the freeway.

**What is the solution.** Keep the Business Park designation that is our vision for the community. Local residents, small businesses and better jobs. The entire area is becoming over saturated with mega warehouses. Wholesale land use changes are being made and the consequences are replacing workers with robots in the near future leading to increased poverty and reduced County revenue.

**Policies:**

The following policies apply to Industrial and Business Park designated properties within the Community Development General Plan Foundation Component, as further depicted on the area plan land use maps



## Community Design

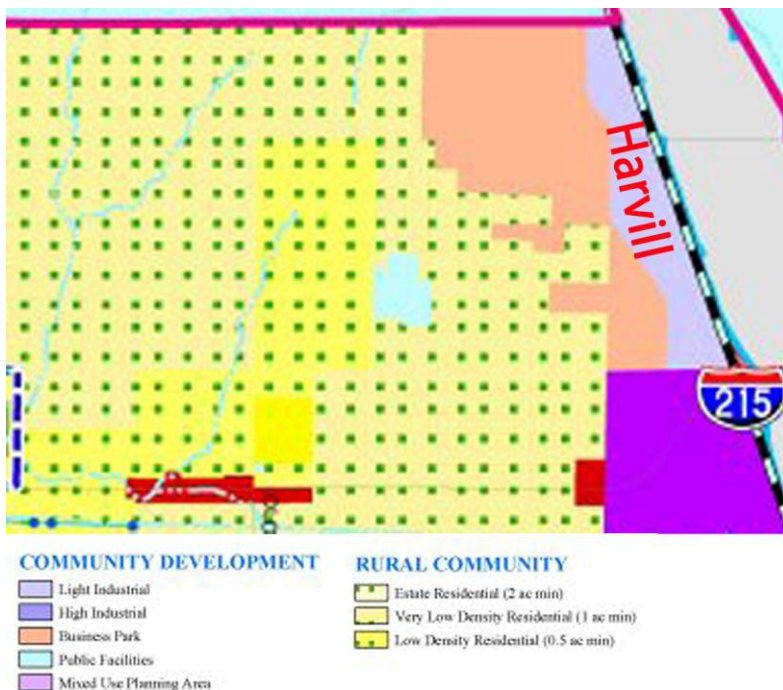
LU 30.2 Control heavy truck and vehicular access to minimize potential impacts on adjacent properties.

**Most of the project is designated Business Park (BP) Land Use in the Riverside County General Plan. Massive Logistics warehouses bring in low paying temps jobs, while small business create "clean industry" with highly skilled labor.**

Business Park (BP)	0.25 - 0.60 FAR	<ul style="list-style-type: none"> <li>Employee intensive uses, including research &amp; development, technology centers, corporate offices, "clean" industry and supporting retail uses.</li> </ul>
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## Light Industrial (LI) Land Use.

Light Industrial (LI)	0.25 - 0.60 FAR	<ul style="list-style-type: none"> <li>Industrial and related uses including warehousing/distribution, assembly and light manufacturing, repair facilities, and supporting retail uses.</li> </ul>
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**Mauve color is Business Park, light purple is Industrial, dark purple is Community Center, Warehouses are being proposed outside of the Business Park land use area changing the Mead Valley Area Plan and Vision**

## PROJECT

The Project proposes to build two high-cube logistics warehouses totaling 1,113,627 square feet.

Building "D" is a 702,645 square foot located to the east of Ellsworth Street and south of Old Oleander on 37.1 acres; and Building "E" is a 410,982 square foot building to the west of Ellsworth and south of Oleander on 21.5 acres.

- General Plan Amendment (GPA) No. 1151 proposes to change the General Plan designation from Community Development- Light Industrial (CD-LI) and Community Development Business Park (CD-BP) to entirely CD-LI.
- Change of Zone No. 7873- a Zone Change for Building E site from (RR) Rural Residential ½- acre lot sizes and (IP) Industrial Park to (IP) Industrial Park.
- GPA No. 1152- seeks to change the General Plan Land Use Designation from CD-BP Community Development Business Park to CD-LI Community Development Light Industrial.
- Change of zone No.7872 for building "D" from (MM) Medium Manufacturing and (RR) Rural Residential to (IP) Industrial Park.

The project site Plot Plans for Buildings E and D contain parking spaces for 331 trucks and trailers—251 at Building Site D and 80 at Building Site E. The Project will also contain 160 loading docks-- 109 at Building D and 51 at Building E. The Plot Plans in EIR 546 indicate that Building E and D will be located directly adjacent to rural residential properties along the southern property boundary line. These types of high cube logistics warehouses operate 24 hours a day and 7 days per week.

After reviewing EIR 546 a large number of major flaws are readily apparent in this document that raise a number of health and safety concerns to the residents of our rural neighborhoods, Community of Mead Valley, surrounding Communities of Greater Lake Mathews, Greater Mead Valley, Woodcrest, Orangecrest and the City of Riverside

There currently is a similar Knox Business Center high cube warehouse at 17789 Harvill that has multiple tenants, which is creating enormous delays in trucks staging (queuing) outside of the facility. More than 30 trucks have been observed lining up on Harvill Ave and along the Harley Knox overpass with their engines idling for hours as they wait their turn to enter this facility. This is causing a traffic nightmare, CARB violations, and safety hazards on Harvill Ave. as these trucks are idling for hours and blocking traffic as cars are turning left from Harley Knox onto Harvill Ave. Some near accidents have been observed. Harvill Ave. was never built to County width standards and therefore trucks cannot park along Harvill Ave. without being in the right lane of traffic. This problem continues during some peak hours of operation.

## **First**

Many of the EIR documents are using out of date information from 2014 and 2015 such as Biological Reports, Cultural Reports, Traffic Studies, etc. Conditions for this project have changed dramatically in a number of ways. Traffic studies fail to include additional mega high cube warehouses currently under construction in the vicinity that were once zoned for residential and commercial land uses. Habitat for wildlife is diminishing rapidly forcing more animals to look for suitable habitat land nearby. **Several warehouses are currently under construction along the eastern portion of Harvill between Markham and Cajalco. These are not included**

**in EIR 546.**

The EIR is flawed at it fails to mention that Building D and E are built to accommodate more than one tenant. The Buildings have two entrance gates and truck access locations along Old Oleander Ave. There are two offices on the northeast and northwest side of each building. There are two separate loading docks and parking spaces on each side of the buildings. Oleander is 78' in width with 2 lanes. See Figure 3-8, Plot Plan No. 25838. Oleander is the primary access for both Building E and D requiring arriving trucks to enter the facilities turning left into the truck entrances. Traffic studies Appendix J1 Traffic Impact Analysis. "Consistent with the 2015 Traffic Study, the ITE High-Cube Warehouse / Distribution Center land use (ITE Land Use Code 152) has been utilized for the purposes of this supplemental analysis" It is unclear as to what information has been updated and what information is still contained from the 2015 traffic study. Various maps show Building E with outdated Plot Plan information and inaccurate outdated traffic assumptions. The fact that Harvill Ave. is undersized cannot be over stated. Trucks cannot park along the street without blocking the right hand lane.

Urban Crossroads noise analysis study for the "Project"

"The traffic noise levels provided in this analysis are based on the traffic forecasts found in the Knox Business Park Traffic Impact Analysis prepared by Urban Crossroads, Inc. in June 2015 (page 23). Outdated traffic report almost 3 years ago. Based on Urban Crossroads noise analysis outdated study as numerous warehouses are currently under construction along Harvill south and east of Markham as part of the Majestic Business Park. One very large warehouse was just completed north of Harley Knox x Nandina.

## EXHIBIT 1-A: LOCATION MAP

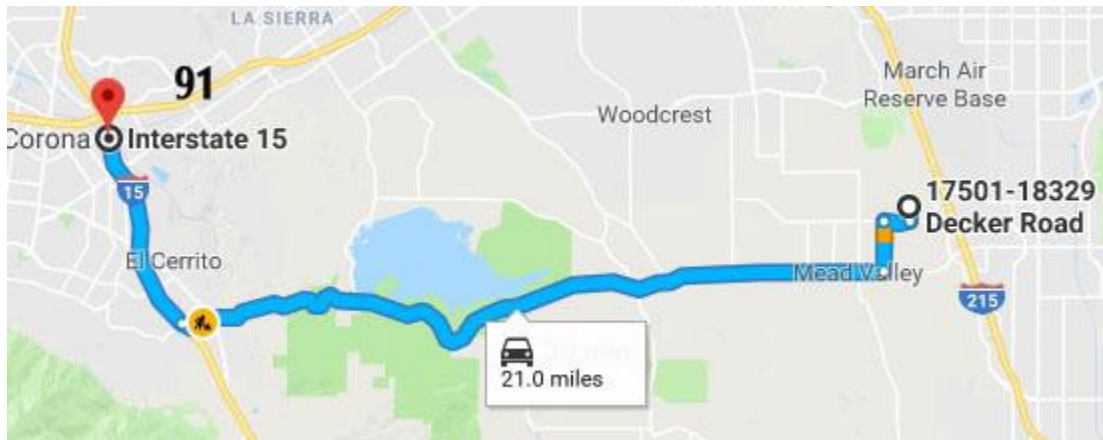


Old Oleander is also undersized for these types of logistics warehouses. Entrances have short distances between them which will make it difficult for trucks to try to turn left into the four truck driveways. The center continuous left-turn lane will only support a few trucks at a time. It is quite possible that trucks will be forced to queue along the shoulder of Oleander Road and then try to turn left into one of the four driveways as other trucks are trying to turn left into a driveway just down the street. Trucks may even back up onto Decker and Harvill Ave and idle as they wait in line. The area to the north will remain unimproved which will attract trucks to use this area for breaks all the while the trucks are idling. EIR air pollution analysis assumes idling time of just 3 minutes which is impossible to attain. Monitoring is impossible to determine what idling times are actually attained.

***Old Oleander is an Industrial Collector and is designated to have 2 lanes with a minimum right-of-way of 78-feet. Industrial Collectors are circulatory streets with a continuous left-turn lane with at least one end connecting to a road of equal or greater classification.***

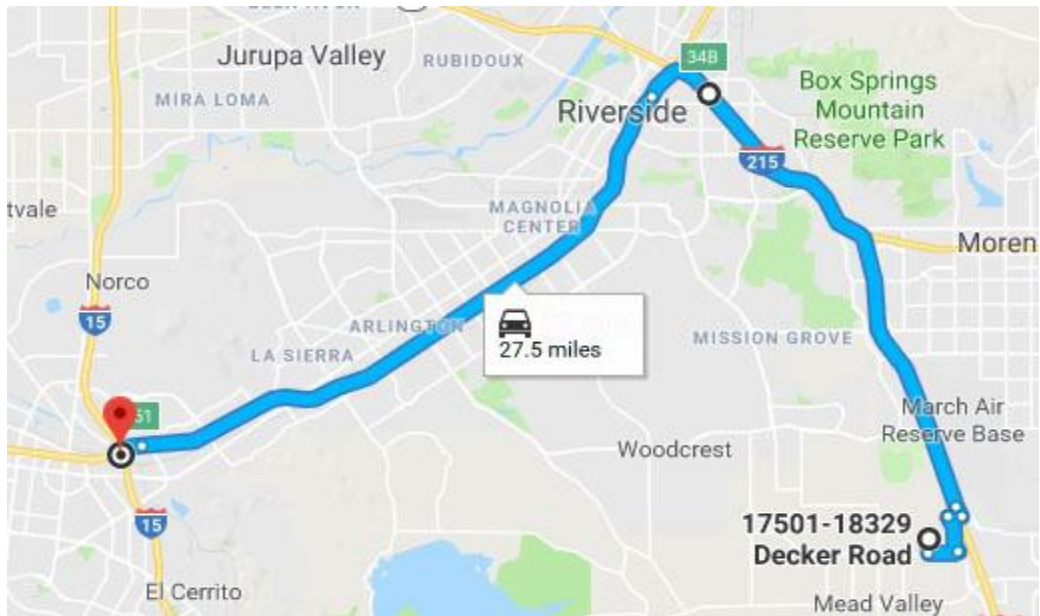
**Decker Road** – Decker Road is a north-south oriented roadway bisecting the Project. The Project proposes to construct Decker Road from Oleander Avenue to the southern Project boundary at its ultimate full section width as a secondary highway (100-foot right-of-way). The EIR does not adequately address the fact that Decker road south of the project boundaries is a non-dedicated unimproved dirt road. Trucks will be driving down a narrow street with 3 speed humps, pot holes, uneven surfaces, dust, mud and no painted markings on the road. No stop sign or street sign at Markham Street X Decker Road. Decker Road is not suitable for heavy truck traffic 24-7 and the noise pollution, air pollution, vibration and Jake Brake noise created from these trucks will destroy the quality of life for thousands of rural residents who live along the routes that these trucks will be traveling. The EIR does not analyze or address this in the traffic study or any other appendices or reports.

The EIR state numerous times that trucks from this project will not use Decker Road south to Markham to access Day Street. This is not based on accurate information. Using Google maps one can easily see that the shortest distance from the Project site is to use Cajalco Road to the I-91 X I-15 Interchange with a distance of 21 miles.



Using El Sobrante to La Sierra to the I-91 is also a much faster route than using Harvill to the I-60 to the I-91. **The EIR states that ALL vehicles will be using Old Oleander to Harvill to access the Harley Knox onramp onto the I-215 Freeway.** The distance for that route is 27.5 miles and has massive traffic congestion during peak hours. The EIR is flawed in its analysis.





Traffic conditions have changed dramatically since this study was performed in 2015. The EIR is flawed and a new current traffic study must be performed. Traffic backs up to Nuevo Road going North and all the way to Orange County going South on the I-215.

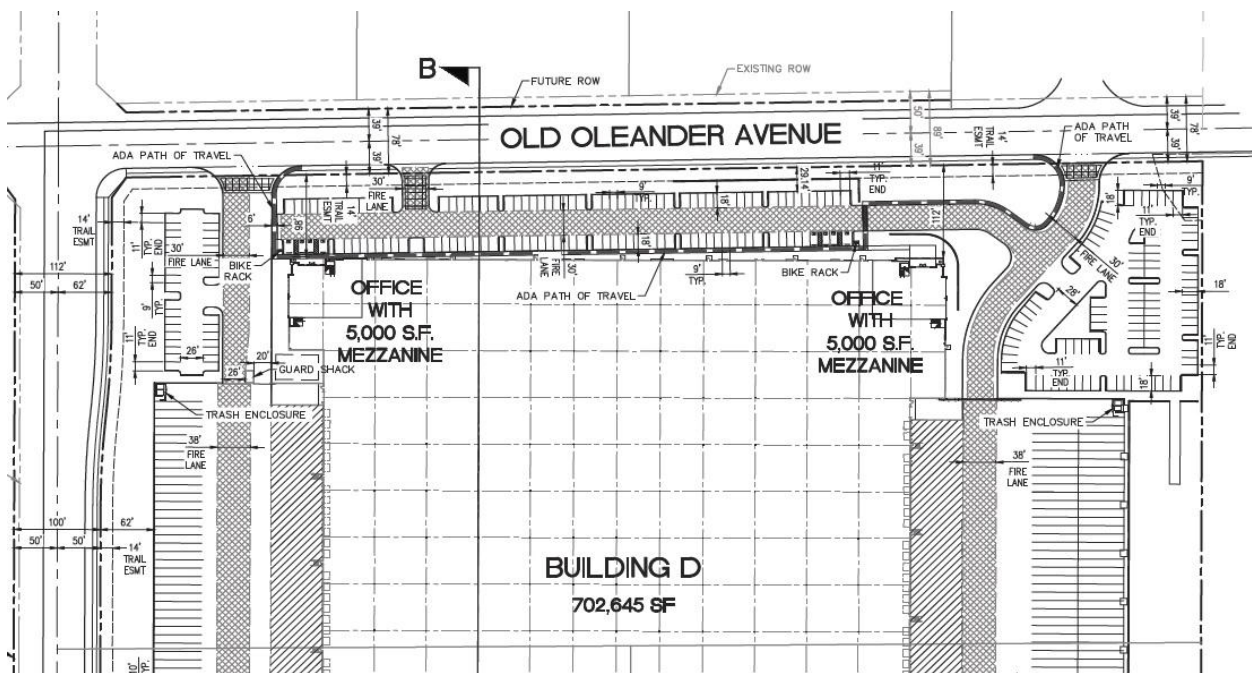


Harvill Ave right hand lane blocked as trucks are trying to gain entry into the logistics warehouse at Harvill X Old Oleander Road. Trucks are blocking traffic as cars are turning left from Harley Knox onto Harvill Ave. There were a number of near accidents caused by these trucks stopped in the right lane of traffic. The developer states this problem is solved, but there are still problems with trucks coming in all at once and backing up along Harvill.





Truck blocking Harvill as the driver turns left from the center median to get into the warehouse gate entrance at 17789 Harvill Ave. This is the same type of conditions that trucks will incur trying to turn left from Old Oleander into the driveways of Building E and D and are not addressed in the EIR. Trucks that are unloaded and trying to travel to Harvill will be idling in the road as they wait to get past trucks parked in the middle of the road. Statements that there are adequate room at the entrances does not allow for 2 tenants for each warehouse with their own entrance.



The EIR 546 fails to analyze the impacts from multiple tenants and inadequately analyzes truck queuing and staging areas along Oleander Ave. These proposed warehouses will be operating 24 hours per day and 7 days per week directly adjacent to rural homes. EIR does not mention trucks idling on local roads or vacant lots.

## **Second.**

The project seeks to merge a number of parcels together with various zoning and land use designations to create 2 large parcels in order to build two distinct high cube logistics warehouses. These two high cube warehouses are being considered as one project totaling over 1.1 million sq ft. **This type of piecemealing or segmentation is not allowed under CEQA. Therefore EIR 546 must be revised and recirculated so that this error to piecemeal the project can be corrected.**

The State CEQA Guidelines define a project under CEQA as “the whole of the action” that may result either directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment.

In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by responsible agencies. When future phases of a project are possible, but too speculative to be evaluated, the EIR should still mention that future phases may occur, provide as much information as is available about these future phases, and indicate that they would be subject to future CEQA review.

CEQA case law has established the following general principles on project segmentation for different project types:

“For a phased development project, even if details about future phases are not known, future phases must be included in the project description if they are a reasonably foreseeable consequence of the initial phase and will significantly change the initial project or its impacts” *Laurel Heights Improvement Association v Regents of University of California* (1988) 47 Cal. 3d 376.

EIR 546 does not mention future Trammel Crow phases for warehouses within the Knox Business Park or the impacts that these future high cube warehouses will have on the surrounding rural neighborhoods, Community of Mead Valley, surrounding Communities of Greater Lake Mathews, Greater Mead Valley, Woodcrest, Orangecrest or the City of Riverside. No mention of the impacts of the Mid-County Parkway that exits onto the I-215 near Placentia / Rider Streets bringing more crime to the area.

For a linear project with multiple segments such as a highway, individual segments may be evaluated in separate CEQA documents if they have logical termini and independent utility. *Del Mar Terrace Conservancy, Inc. v. City Council* (1992) 10 Cal. App. 4th 712.

For a planning approval such as general plan amendment, the project description must include reasonably anticipated physical development that could occur in view of the approval. *City of Redlands v. County of San Bernardino* (2002) 96 Cal. App. 4th 398.

For a project requiring construction of offsite infrastructure (e.g., water and sewer lines), the offsite infrastructure must be included in the project description. *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App. 4th 713.

For modification of a permit for an existing facility, the scope of the project description can be limited to the scope of the permit modification and does not cover the entire facility. *Citizens for East Shore Parks v. State Lands Commission* (2011) 202 Cal.App. 4th 549. (<https://ceqportal.org//tp/ProjectDiscription03-23-161.pdf>).

Building Industrial High Cube logistics warehouses at this location will set a precedent for future warehouses in the rural and business park zoned areas next to and nearby this proposed project.

### **Third**

The EIR assessment for Building "E" on the west side of Decker Road has been modified substantially in the number of parcels, combined lot size and building size. Modification to the EIR for Building "E" describe different scenarios in regards to traffic flow, differing elevation height measurement of the building and various other inconsistencies that affect every aspect of the Environmental Impact Report. This EIR must be rejected because the project description is inaccurate and is described differently in different parts of the document. The approval by the ALUC is also inconsistent and inaccurate with the EIR in the project size and description.

Building height is described in the ALUC public hearing as a request to go from 44' to 55'. EIR 546 and project description do not mention the new height of 55' in their reports and analysis. How will this impact noise, air pollution, traffic, number of trucks being processed each day, etc.

*County of Inyo v. City of Los Angeles* (1977) 32 Cal. App. 3d 795:

"EIR was rejected because the project description was inaccurate and was described differently in different parts of the document" (AEP CEQA Portal, CEQA Portal Topic paper)

Project Description in the State CEQA Guidelines.

The project description is addressed in the following sections of the State CEQA Guidelines:

**Section 15378** – Defines the term “project” as used within CEQA, and the types of actions that either do or don’t constitute a project for the purposes of CEQA.

**Section 15124** – Discusses the types of information about a proposed project that should be included in the Project Description.

### **Fourth**

MVAP 6.1 In conjunction with the first warehousing/distribution building proposed for the industrial area located along Interstate 215 (including land designated Light Industrial, Business Park, and Light Industrial with a Community Center Overlay) whereby the cumulative square footage of warehousing/distribution space in the area would exceed 200,000 square feet, an Environmental Impact Report (EIR) shall be prepared that assesses the potential impacts of the

project. The EIR must address air quality, including a health risk assessment of diesel particulates and impacts to sensitive receptors, truck traffic and noise, and the cumulative impacts of reasonably foreseeable warehouse development in the area (Mead Valley Area Plan, pg. 32).

Final EIR 546 does not adequately address air quality, including the health risk assessment of diesel particulates and impacts to sensitive receptors, truck traffic and noise, and the cumulative impacts of reasonably foreseeable warehouse development in the area. Impacts such as noise pollution, truck traffic impacts to sensitive receptors (rural residential property) that abuts this project, impacts of using Decker Road which is a unimproved dirt road with speed bumps, pot holes, uneven surfaces, lack of painted road lines, no stop sign and no road sign. Decker is listed as the secondary access to Buildings D and E. No mention in the EIR that Decker Road will allow trucks from this Project to use a large number of local roads to get to the Ports.

Noise: According to the Riverside County General Plan N.1 Noise Element, " **Sound** refers to anything that is or may be perceived by the ear. **Noise** is defined as "unwanted sound" because of its potential to disrupt sleep, rest, work, communication, and recreation, to interfere with speech communication, to produce physiological or psychological damage, and to damage hearing."

The Noise Element is a mandatory component of the General Plan pursuant to the California Planning and Zoning Law, Section 65302(f).

Research pursuant to Section 46050.1 of the Health and Safety Code. It also can be utilized as a tool for compliance with the State of California's noise insulation standards.

### **Noise Sensitive Land Uses**

A series of land uses have been deemed sensitive by the State of California. These land uses require a serene environment as part of the overall facility or residential experience. Many of these facilities depend on low levels of sound to promote the well being of the occupants. These uses include, but are not necessarily limited to; schools, hospitals, rest homes, long term care facilities, mental care facilities, residential uses, places of worship, libraries, and passive recreation areas. Activities conducted in proximity to these facilities must consider the noise output, and ensure that they don't create unacceptable noise levels that may unduly affect the noise-sensitive uses. N-4

Require commercial or industrial truck delivery hours be limited when adjacent to noise-sensitive land uses unless there is no feasible alternative or there are overriding transportation benefits (AI 105, 107). The current project is not restricted in any way and will be operating 24-7. Construction operations are also not limited and will be allowed to pour concrete 24-7 (allowing for loud noise, light trespass, dust, air pollution, traffic 24-7).

Require a minimum setback of 1000ft. SCAQB, WRCOG highly recommend 1000 foot setbacks from industrial land uses. Mead Valley Area Plan requires setbacks from sensitive receptors.

<http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/chapter-2---air-quality-issues-regarding-land-use.pdf>

N 15.2 Require that commercial and residential mixed-use structures minimize the transfer or

transmission of noise and vibration from the commercial land use to the residential land use. (AI 105)

**Policies:**

N 16.1 Restrict the placement of sensitive land uses in proximity to vibration-producing land uses. (AI105)

<http://www.rivcocob.org/ords/800/847.pdf>

Noise: Rural Community VLDR

Maximum DB 7:00 am - 10:00 pm 55db / 10:00pm - 7:00am 45 db.

LI zone 7:00 am - 10:00 pm 75db / 10:00pm - 7:00am 55 db.

b. Power Tools and Equipment. No person shall operate any power tools or equipment between the hours of 10:00 p.m. and 8:00 a.m. such that the power tools or equipment are audible to the human ear inside an inhabited dwelling other than a dwelling in which the power tools or equipment may be located. No person shall operate any power tools or equipment at any other time such that the power tools or equipment are audible to the human ear at a distance greater than one hundred (100) feet from the power tools or equipment.

Warehouse construction is allowed to operate with loud noise at distances greater than 2 blocks from the site at night with bright lights, generators, and concrete pumping machines and concrete trucks. Neighbors at these distances cannot sleep because of the light trespass and noise generated from construction operations.

EIR claims that air pollution is getting better, while that is not the case as air pollution is getting worse.

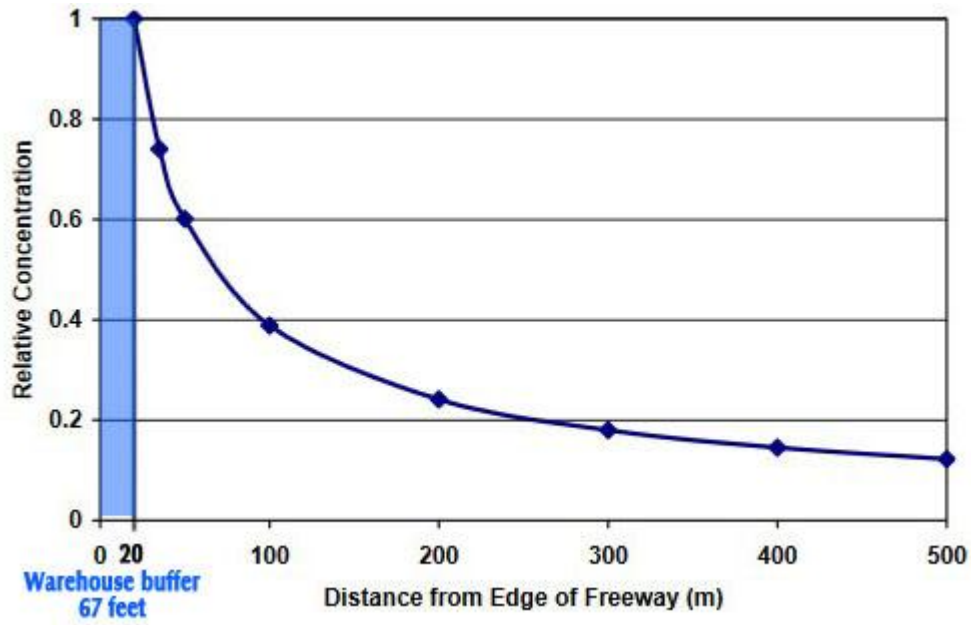
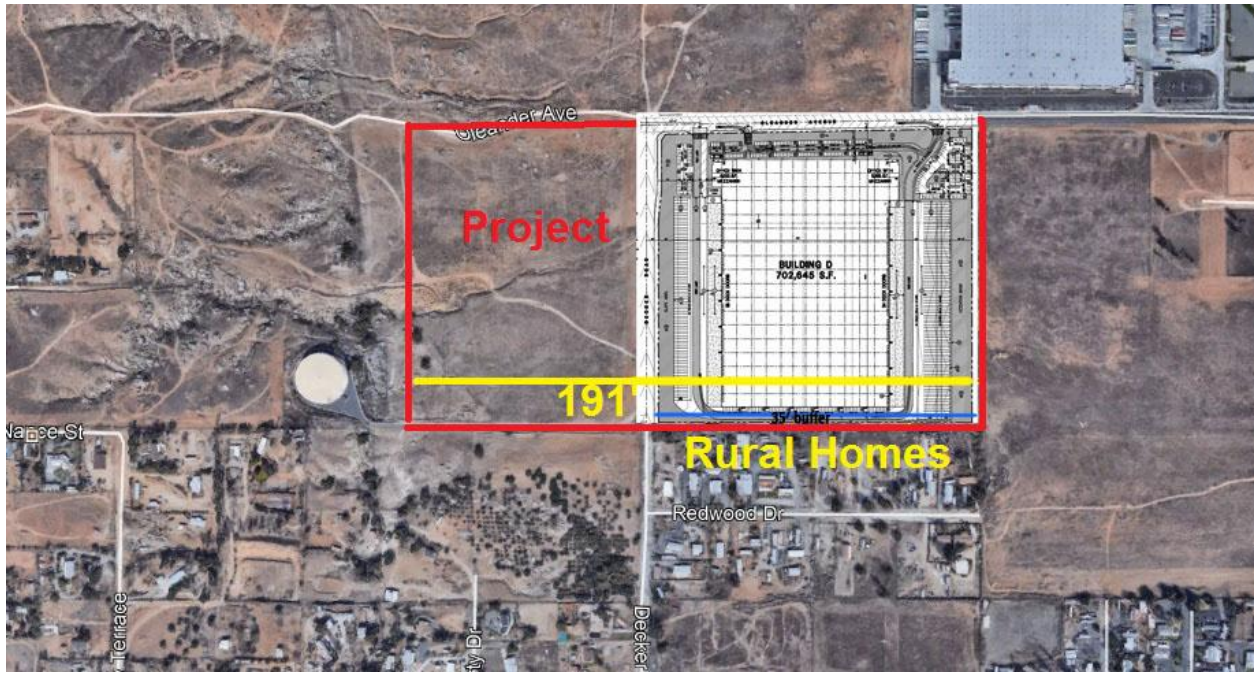
<http://www.latimes.com/local/lanow/la-me-ln-bad-air-days-20171115-story.html>

<https://www.dailynews.com/2017/05/24/why-is-southern-californias-air-quality-so-bad-its-smog-season/>

<https://www.pe.com/2017/04/18/southern-californias-smog-clean-up-future-is-far-from-clear/>

EIR 546 not only fails to meet CEQA guidelines, but also falls short of the Riverside County General Plan - Mead Valley Area Plan for land use with NO buffer between sensitive receptors and Building "D". The total square footage of Building "D" and "E" will be over 1.1 million square feet of high cube warehouses up to 55' tall removing all view of the valleys and mountains from residents living nearby and up the hill at Day Street. The buildings will have very tall slopes up to 17' tall next to homes, a secondary highway and community trail. The EIR does not address the ineffective noise / pollution barriers that will be put in place as an attempt to protect rural residents against harmful cumulative effects of noise pollution, air pollution, light trespass, truck traffic, vibration day and night 24-7. EIR states buffer of 191' between residents and warehouse. The actual buffer is just 67' from the property line between rural residents and the warehouse. Trucks utilizing the southern driveway will be much closer to residents homes. The warehouse similar to this on Harvill has numerous trucks parked in the auto parking areas which in the case of this project will be next to residents homes.





Maximum buffer from property line to south warehouse wall 67'. EIR states 191' buffer.



Figure 2-1

**Relative Concentration of Diesel Particulate Matter  
in Relation to the Distance from The Edge of a Freeway**

Source: South Coast Air Quality Management District. Adapted from the California Air Resources Board's Diesel Risk Reduction Plan.

A comparison of total cancer risk and cancer risk from diesel particulate matter emissions in rural and urban areas shows that cancer risk associated with elevated levels of diesel particulate both decrease rapidly within the first 100 – 150 meters from the edge of a roadway (Table 2-2). Estimated cancer risk from diesel particulate matter along rural and urban roadways is decreased approximately 68 percent at a distance 150 m (492 ft) from the edge of the roadway. Clearly, these data demonstrate that a minimum distance that separates sources of diesel emissions from nearby receptors is effective in reducing potential cancer risk. The AQMD recognizes that physical separation of the receptors from the pollution sources is not always reasonable or feasible particularly in mature communities. For example, in southern Los Angeles county a sequence of land use decisions in urban areas allowed freeway construction through existing neighborhoods.

Table 2-2

**Cancer Risks from Diesel Particulate Matter at the  
Edge of Roadways in Rural and Urban Areas**

Distance from Edge of Roadway (meters)	Diesel Particulate Matter Cancer Risk (in one million)		Total Cancer Risk (in one million)*	
	Rural	Urban	Rural*	Urban*
20 m	475	890	589	1104
150 m	151	277	187	343
500 m	86	159	107	197

Source: South Coast Air Quality Management District. Adapted from the California Air Resources Board's Diesel Risk Reduction Plan.

\*To account for gasoline vehicle emissions, the diesel PM risk was multiplied by 1.24. This represents the relative risk contribution from benzene, 1, 3 butadiene, formaldehyde, and acetaldehyde on a basin-wide basis. It is assumed that the vast majority of benzene, 1, 3 butadiene, formaldehyde, and acetaldehyde emissions come from on-road gasoline vehicles.

The AQMD provides guidance for analyzing cancer risks from diesel particulate matter from mobile sources at facilities such as truck stops and warehouse distribution centers in the document titled Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis. This document may be downloaded at <http://www.aqmd.gov/ceqa/hdbk.html>. This guidance describes analysis of potential cancer risks associated with diesel particulates from truck idling and movement (such as truck stops, warehouse and distribution centers, or transit centers), ship hotelling at ports, and train idling. It is suggested that projects with diesel-powered mobile sources use this health risk guidance document to quantify potential cancer risks from the diesel particulate emissions.

[http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/particulate-matter-\(pm\)-2.5-significance-thresholds-and-calculation-methodology/final\\_pm2\\_5methodology.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/particulate-matter-(pm)-2.5-significance-thresholds-and-calculation-methodology/final_pm2_5methodology.pdf?sfvrsn=2)

## **Riverside County General Plan - Chapter 10 - Healthy Communities Elements**

Policies:

HC 14.1

When feasible, avoid sitting homes and other sensitive receptors near known or anticipated sources of air pollution. (EIR is flawed in its analysis of the Health Communities Element).

HC 14.2

When feasible, avoid locating new sources of air pollution near homes and other sensitive receptors (Page 16).

[http://planning.rctlma.org/Portals/0/genplan/general\\_Plan\\_2017/elements/OCT17/Ch10\\_HCE\\_120815.pdf?ver=2017-10-11-102105-050](http://planning.rctlma.org/Portals/0/genplan/general_Plan_2017/elements/OCT17/Ch10_HCE_120815.pdf?ver=2017-10-11-102105-050)

<https://www.sciencedaily.com/releases/2013/10/131029220800.htm>

This project contradicts the General Plan and Mead Valley Area Plan Healthy Communities Element

### **Potential Mitigation Measures**

CEQA requires public agencies to take responsibility for protecting the environment. In regulating public or private projects, agencies are expected to avoid or minimize environmental damage. The purpose of an EIR is to identify the significant effects of a project on the environment, identify alternatives to the project, and indicate the manner in which significant impacts can be mitigated or avoided. To this end, below is a list of potentially applicable mitigation measures for truck idling facilities, shipping activities in local ports, and train idling.

<http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>

### **Mobile Source Toxics Analysis**

In August 2002, the SCAQMD's Mobile Source Committee approved the "Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions."

In August 2002, the SCAQMD's Mobile Source Committee approved the "Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions." This document provided guidance for analyzing cancer risks from diesel particulate matter from mobile sources at facilities such as truck stops and warehouse distribution centers.

Subsequently, SCAQMD staff revised the aforementioned document to expand the analysis to provide technical guidance for analyzing cancer risks from potential diesel particulate emissions impacts from truck idling and movement (such as, but not limited to, truck stops, warehouse and distribution centers, or transit centers), ship hotelling at ports, and train idling. This revised guidance document titled, "Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis" was presented to and approved by the SCAQMD's Mobile Source Committee at its March 28, 2003 committee meeting. It is suggested that projects with diesel powered mobile sources use the following guidance document to quantify potential cancer risks from the diesel particulate emissions.

*Truck Idling Facilities*

- Provide a minimum buffer zone of 300 meters between truck traffic and sensitive receptors;
  - Re-route truck traffic by adding direct off-ramps for the truck traffic or by restricting truck traffic on certain sensitive routes;
  - Improve traffic flow by signal synchronization;
  - Enforce truck parking restrictions;
  - Develop park and ride programs;
  - Restrict truck idling;
  - Restrict operation to “clean” trucks;
  - Electrify service equipment at facility;
  - Provide electrical hook-ups for trucks that need to cool their load;
  - Electrify auxiliary power units;
  - Use “clean” street sweepers;
  - Pave roads and road shoulders;
  - Provide onsite services to minimize truck traffic in or near residential areas, including, but not limited to, the following services: meal or cafeteria service, automated teller machines, etc;
  - Require or provide incentives to use low-sulfur diesel fuel with particulate traps; and
  - Conduct air quality monitoring at sensitive receptors.
- 
- (1) Provide a minimum buffer zone of 300 meters between truck traffic and sensitive receptors. NO BUFFER is being provided between residents and this project.
  - 
  - No real buffer is being provided between truck traffic and sensitive receptors. Trucks will be traveling around the south boundary of the property. Trucks bays and parking stalls are near the south end of the warehouse where residents live.
  - (2) Re-route truck traffic by adding direct off-ramps for the truck traffic or by restricting truck traffic on certain sensitive routes.
  - Restricting trucks from traveling on residential streets is not included in the FEIR. Weight limit signs as well as blocking off Decker Road at the southern property line of Building "E" and "D" is critical to keeping trucks out of rural residential neighborhoods.
  - (3) Improve traffic flow by signal synchronization. No signal lights will be installed as part of this project.
  - (4) Enforce truck parking restrictions. Truck parking in adjacent Knox warehouses are not being enforced. Trucks and trailers

are allowed to park in areas not assigned to trucks. Car parking areas and other areas restricted from truck parking are occurring without any consequences.

- (5) Develop park and ride programs.  
No park and ride programs in the area.
- (6) Restrict truck idling.  
Trucks allowed to idle for hours in Knox Business Park. Restrictions are ignored.
- (7) Restrict operation to “clean” trucks.  
Many trucks coming into these facilities are older and not clean trucks. The paint is worn off and they appear to be unkept.
- (8) Electrify service equipment at facility.  
Some equipment will use electricity.
- (9) Provide electrical hook-ups for trucks that need to cool their load.  
No Refrigerated hook-ups will be installed for cool product shipping.

(10) Electrify auxiliary power units.

- (11) Provide onsite services to minimize truck traffic in or near residential areas, including, but not limited to, the following services: meal or cafeteria service, automated teller machines, etc.

No services are being provided.

- (12) Require or provide incentives to use low-sulfur diesel fuel with particulate traps;
- (13) Conduct air quality monitoring at sensitive receptors.  
This must be mandatory. Location of these receptors is critical.

- **County of Riverside General Plan December 8, 2015 Page 11**

- AQ 1.11
- Involve environmental groups, the business community, special interests, and the general public in the formulation and implementation of programs that effectively reduce airborne pollutants.  
This is not happening. Current guidelines are being completely ignored.

### **Sensitive Receptors**

- Sensitive receptors refer to those segments of the population most susceptible to poor air quality (i.e. children, elderly and the sick) and to certain at-risk sensitive land uses such as schools, hospitals, parks, or residential communities. The intent of the following policies is to reduce the negative impacts of poor air quality on Riverside County’s sensitive receptors.

NO BUFFERS provided and will be at risk to the health effects of this project.

Policies:

AQ 2.1

- The County land use planning efforts shall assure that sensitive receptors are separated and protected from polluting point sources to the greatest extent possible. (AI 114)

#### AQ 2.2

- Require site plan designs to protect people and land uses sensitive to air pollution through the use of barriers and/or distance from emissions sources when possible. (AI 114)

#### AQ 2.3

- Encourage the use of pollution control measures such as landscaping, vegetation and other materials, which trap particulate matter or control pollution. (AI 114)

#### AQ 2.4

- Consider creating a program to plant urban trees on an Area Plan basis that removes pollutants from the air, provides shade and decreases the negative impacts of heat on the air. (AI 114)

- **Stationary Pollution Sources**

#### AQ 4.6

- Require stationary air pollution sources to comply with applicable air district rules and control measures.

#### AQ 4.7

- To the greatest extent possible, require every project to mitigate any of its anticipated emissions which exceed allowable emissions as established by the SCAQMD, MDAQMD, SCAB, the Environmental Protection Agency and the California Air Resources Board.

[http://planning.rctlma.org/Portals/0/genplan/general\\_Plan\\_2017/elements/OCT17/Ch09\\_AQ%20%20Element\\_120815.pdf?ver=2017-10-11-102104-270](http://planning.rctlma.org/Portals/0/genplan/general_Plan_2017/elements/OCT17/Ch09_AQ%20%20Element_120815.pdf?ver=2017-10-11-102104-270)

### **Particulate Matter**

The Environmental Protection Agency (EPA) defines particulate matter (PM) as either airborne photochemical precipitates or windborne dust. Consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols, common sources of PM are manufacturing and power plants, agriculture, diesel trucks and other vehicles, construction sites, fire and windblown dust.

Generally PM settles from atmospheric suspension as either particulate or acid rain and fog that has the potential to damage health, crops, and property. Particulate of 2.5 microns or smaller (2.5 microns is approximately equal to .000098 inches) may stay suspended in the air for longer periods of time and when inhaled can penetrate deep into the lungs. Among the health effects related to PM<sub>2.5</sub> are premature death, decreased lung function and exacerbation of asthma and other respiratory tract illnesses.

Airborne particulate matter sized between 2.5 and 10 microns (10 microns is approximately equal to 0.0004 inches), known as PM<sub>10</sub> also pose a great risk to human health. PM<sub>10</sub> can easily enter the air sacs in the lungs where they may be deposited, resulting in an increased risk of developing cancer, potentially changing lung function and structure, and possibly exacerbating preexisting respiratory and cardiovascular diseases. It can also irritate the eyes, damage sensitive tissues, sometimes carry disease, and may even cause premature death. PM<sub>2.5</sub> and PM<sub>10</sub> are especially hazardous to the old, young and infirm.

## Control Measures

Riverside County can implement simple control measures to reduce the amount of particulates produced within its borders. Strict enforcement of these and current regulations can then lead to a substantial decrease in particulate concentrations in the County of Riverside and neighboring areas.

### AQ 17.8

Adopt regulations and programs necessary to meet state and federal guidelines for diesel emissions. (AI 121)

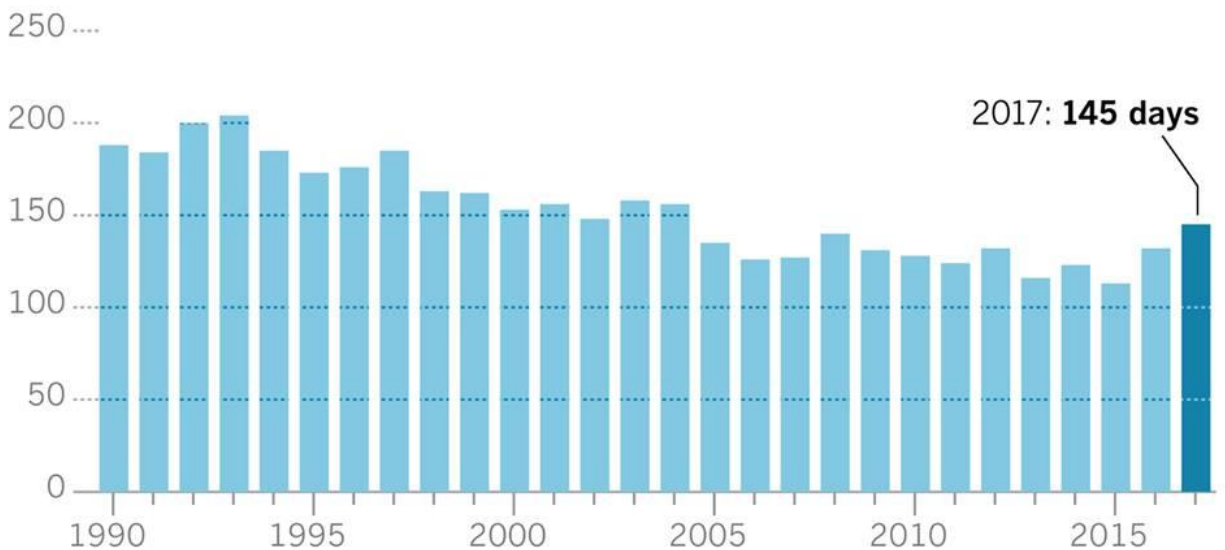
### AQ 17.9

Encourage the installation and use of electric service units at truck stops and distribution centers for heating and cooling truck cabs, and particularly for powering refrigeration trucks in lieu of idling of engines for power. (AI 120)

### AQ 17.10

Promote and encourage the use of natural gas and electric vehicles in distribution centers. (AI 146, 147).

## Southern California bad air days for ozone



Source: South Coast Air Quality Management District Tony Barboza / @latimesgraphics

## Riverside County Parks and Open Space Comprehensive Trails Plan

Chapter 3 - Page 46

### Mead Valley Area Plan

The Mead Valley Area Plan represents an area in western central Riverside County.

The three major land uses are open space, rural communities, and some light industrial.

A number of institutional areas surround the planning area, potentially influencing the area's development. Policies related to trails contained within the Mead Valley Area Plan area.



Highly suggest Decker Trail be set along west side of the road. The east side of Decker at Markham has a massive water runoff issue where rip rap has been installed to protect the EMWD pumping station and homes.

The EIR fails to address or analyze homes directly south of this project along the hills west of Decker Road. These homes will be directly impacted by the noise pollution, air pollution, rock blasting, vibration, light trespass and truck traffic. Although these homes just over the 600' minimum will be greatly impacted the property owners were never notified of the General Plan Amendments and zone changes that will greatly impact their lives. This is another example of how sound will be amplified by the sound waves rising above the sound walls and air pollution rising against the hills.



"The Business Park uses on the west side of Harvill Avenue provide a buffer for residential uses to the west" (<http://planning.rctlma.org/Portals/0/genplan/content/ap1/meadvalley.html>).

This proposed project eliminates the Business Park buffer provided through the Riverside County General Plan – Mead Valley Area Plan.

“A General Plan is required by State law and is the County's over-arching policy document for land use matters. It determines what the housing needs will be, how roads will be placed, and where commercial and industrial uses will be situated throughout the County for the next 20 years and beyond. The General Plan Elements (see Item 1., below) generally discuss countywide policies and plans. The Area Plans (see items 2 and 3, below) within the General Plan address regional issues and policies, to address the special needs of each unique community within the County. Lastly, the Area Plans contain parcel-level maps that indicate the General Plan "land use designation" for each property subject to County jurisdiction. Per State laws, a

parcel's zoning will have to be brought into compliance with the General Plan (for example, the site's land use designations) before a project can be approved” (<http://planning.rctlma.org/ZoningInformation/GeneralPlan.aspx>).

The simplest way to summarize our vision for Riverside County is to say that:  
“*Riverside County is a family of special communities in a remarkable environmental setting.*”  
Riverside County Vision Statement. Pg. V3)

### *Health*

We value the health of our residents. Therefore, we seek to reverse significant negative national health trends so that: 1) children live healthier and longer lives than their parents; 2) air and water quality are improved, 3) respiratory illnesses are reduced so that people spend fewer days out of work and school because of health problems; 4) health care costs have decreased; 5) obesity has decreased; and 6) people are physically active.  
(Riverside County Vision Statement, Pg. V3)

The EIR for this project for Industrial High Cube Warehouses does not give residents a buffer from this harmful high polluting industry. Children, the elderly, and people with respiratory illness and heart disease are most affected by living next to and near high pollution industries such as logistics warehouses that have large numbers of diesel trucks that create high amounts of particulate matter and other unhealthy toxic gases into the air. Rubber particles from truck tires was never addressed in the EIR. Tire particles are very small and can penetrate deeply into your lungs causing serious health problems. Hundreds of trucks will be traveling on our local rural roads to get to the ports of LA and Long Beach instead of using Harvill to access the I-215 Freeway. Trucks cause excessive wear and tear on our local streets increasing tire wear and rubber particles into the air that we breathe.

### *Mead Valley Area Plan*

#### *Industrial Development*

The Mead Valley Area Plan includes an extensive area westerly of Interstate 215 from Nandina Avenue on the north to Nuevo Road and the Perris city limits on the south that is designated Light Industrial, Business Park, or Light Industrial with a Community Center Overlay. It is the policy of Riverside County to stimulate economic development in this area of Mead Valley. This area has access to Interstate 215 via two interchanges and includes areas that have all of the infrastructure in place to support economic development. However, given the proximity of the rural community and residential uses, the impacts of industrial expansion on localized air quality, traffic, noise, light and glare need to be assessed in order to apply appropriate measures to mitigate impacts so that the environmental quality of the community and residents' health and welfare are maintained (Mead Valley Area Plan, pg. 36).

#### **Policies:**

##### MVAP 6.1

In conjunction with the first warehousing/distribution building proposed for the industrial area located along Interstate 215 (including land designated Light Industrial, Business Park, and Light Industrial with a Community Center Overlay) whereby the cumulative square footage of warehousing/distribution space in the area would exceed 200,000 square feet, an Environmental Impact Report (EIR) shall be prepared that assesses the potential impacts of the project. The EIR would be required to address air quality, including a health risk assessment of diesel particulates

and impacts to sensitive receptors, truck traffic and noise, and the cumulative impacts of reasonably foreseeable warehouse development in the area (Mead Valley Area Plan, pg. 36).

EIR 546 fails to measure "impacts of industrial expansion on localized air quality, traffic, noise, light and glare. This must be reassessed in order to apply appropriate measures to mitigate impacts so that the environmental quality of the community and residents' health and welfare are maintained. The EIR fails to give adequate setback between this proposed project and residential uses. WRCOG and SCAQMD requires a 1000 foot buffer between sensitive receptors and logistics warehouses (See, <http://www.aqmd.gov/docs/default-Source/planning/air-quality-guidance/chapter-2---air-quality-issues-regarding-land-use.pdf?sfvrsn=2> ). The EIR fails to address air quality, including an adequate health risk assessment of diesel particulates and impacts to **sensitive receptors**, truck traffic and noise, and the cumulative impacts of reasonably foreseeable warehouse development in the area (Riverside County General Plan- Mead Valley Area Plan).

#### **Fifth.**

Rock blasting on the Project Site near residents along Redwood Street, Nance, Day, Decker and Oleander is not adequately analyzed or addressed in the EIR.

The following blasting noise and vibration monitoring and abatement plan shall be adopted and submitted to the County prior to commencement of blasting activities:

- Pre-blasting inspections shall be offered to property owners within 200 feet of the blast site.
- Existing damage of each structure shall be documented.
- Post-blasting inspections shall be offered to assess new or additional damage to each structure once blasting activities have ceased for those property owners who accepted pre-blast inspections.
- Property owners within at least 200 feet of the blast site shall be notified via postings on the construction site at least 24 hours before the occurrence of major construction related noise and vibration impacts (such as grading and rock blasting) which may affect them.
- The County may impose conditions and procedures on the blasting operations as necessary. The construction contractor shall comply with these measures for the duration of the blasting permit. The County may inspect the blast site and materials at any reasonable time (County of Riverside Ordinance No. 787) (Noise Impact Analysis, pg. 6).

The EIR fails to address the impacts to residents directly adjacent to the project site. "Property owners within at least 200 feet of the blast site shall be notified via postings on the construction site at least 24 hours before the occurrence of major construction related noise and vibration impacts (such as grading and rock blasting) which may affect them" (Noise Impact Analysis, pg. 6).

Certainly this is not adequate as residents will not have access to the Project site once construction is under way. Residents will not be aware of any signage or posting on the construction site and 24 hours is not enough notice to take measures to safeguard their property and livestock. Residents surrounding this project site must be notified in person, written notice or with a notice attached to the property gate as to the date and time that blasting will occur at least

72 hours prior to blasting. The EIR fails to take into account that this a rural neighborhood where many residents have large livestock and other animals that may become frightened from the noise and vibrations of these blasts. Residents have the right to protect their property (including livestock) from injury and damage.

The EIR does not mention the adverse health impacts of silica dust from extensive rock crushing, movement and usage near the southern portion of the project affecting residents along Redwood Street and residents to the southwest and west of the project as winds shift this dust onto their property.

C-69 Noise Impacts - Blasting rocks. Rock blasting next to homes, animals, wildlife, damage to structures. Wildlife impacts from noise, light trespass, vibration is not being addressed in the EIR. Required by the State Fish and Game.

DEIR SCH No. 2015081081. Page 3-32 - 3.6 CONSTRUCTION CHARACTERISTICS  
As part of proposed grading activities, blasting would be necessary in hard rock areas on the southern portion of the Project site. Based on the excavation plans prepared on June 16, 2015, by the Henry- Ann Company, rock blasting within the Project site is expected to include the drilling of up to 5,253 holes in the largest area, in which small charges would be placed to fragment the rocks into smaller, crushable pieces. **Approximately 112,090 cubic yards (c.y.) of rock is expected to be produced during proposed blasting activities, which would be crushed and used on the Project site as construction base.** An electric rock crusher powered by a 300 horsepower diesel generator is proposed to further break down the fragmented rocks. The Project Applicant calculates that approximately 2,759 tons of rock would be processed on the Project site per day during the blasting and rock crushing phase of construction (approximately 65 working days). (Urban Crossroads, Inc, 2015a, pp. 28-29).

**Area of rock crushing southern portion of site. This is where residents live. NO MENTION OF DUST RELATED HEALTH HAZARDS (SILICA DUST EXPOSURE) CREATED BY ROCK CRUSHING AND LONG TERM HAZARDS OF CONSTRUCTION BASE USING THIS SILICA DUST AS BASE.**

**No mention of special water spraying equipment to keep this toxic dust down and safe.**

**Rock crushing will take place next to rural homes for months and perhaps years.**

#### **OSHA- CONTROL OF SILICA DUST IN CONSTRUCTION**

##### **Crushing Machines**

Using crushing machines at construction sites to reduce the size of large rocks, concrete, or construction rubble can generate respirable crystalline silica dust.

When inhaled, the small particles of silica can irreversibly damage the lungs. This fact sheet describes dust controls that can be used to minimize the amount of airborne dust when using crushing machines as listed in Table 1 of the Respirable Crystalline Silica Standard for Construction. 29 CFR 1926.1153

##### ***What is Silicosis?***

Silicosis is a disease caused by the prolonged breathing of crystalline silica dust. Fine particles

deposited in the lungs cause thickening and scarring of the lung tissue. Crystalline silica exposure has also been linked to lung cancer.

A worker may develop any of the following three types of silicosis, depending on the concentrations of silica dust and the duration of exposure:

- Chronic silicosis** - develops after 10 or more years of exposure to crystalline silica at relatively low concentrations;
- Accelerated silicosis** - develops 5 to 10 years after initial exposure to crystalline silica at high concentrations.
- Acute silicosis** - symptoms develop anywhere from a few weeks to 4-5 years after exposure to very high concentrations of crystalline silica.

Initially, workers with silicosis may have no symptoms. However, as the disease progresses a worker may experience:

- Shortness of breath;
- Severe cough;
- Weakness.

These symptoms can worsen over time and lead to death.

<https://www.cagc.ca/index.php?DP=download&DL=000264>

<https://www.silica-safe.org/pdf/OSHA-Controlling-Silica-Exposure-in-Construction.pdf>

[https://www.fhwa.dot.gov/Environment/noise/construction\\_noise/handbook/handbook09.cfm](https://www.fhwa.dot.gov/Environment/noise/construction_noise/handbook/handbook09.cfm)

[http://homenewshere.com/daily\\_times\\_chronicle/news/woburn/article\\_9d90876a-8afe-11e1-acb5-0019bb2963f4.html](http://homenewshere.com/daily_times_chronicle/news/woburn/article_9d90876a-8afe-11e1-acb5-0019bb2963f4.html)

<http://denw.info/noise-and-acoustics/>

[http://deohs.washington.edu/sites/default/files/images/general/Quarry\\_Rpt.pdf](http://deohs.washington.edu/sites/default/files/images/general/Quarry_Rpt.pdf)

<http://osha.oregon.gov/OSHAPubs/3301.pdf>

<https://www.osha.gov/Publications/OSHA3935.pdf>

wet rock and dust.

<http://www.cdrecycler.com/article/july-aug-2011-more-than-a-nuisance/>

## **Sixth.**

Truck and vehicle traffic is not adequately addressed in the EIR. Two main entrances along Oleander are indicated on Building "D" & "E" Site Plans. These plans also indicate two distinct offices with one at the northwest and one at the northeast corners of Building "D" & "E" This indicates that buildings "E" and "D" will have more than one tenant. Trammel Crow Knox Business Park Building at 17789 Harvill Ave. has several tenants, which is creating enormous traffic, health and safety concerns with 30 or more diesel trucks lined up outside of the entrance to the facility. These logistics trucks are lined up along Harvill Ave. idling for hours, blocking the right lane of the road and left turn lane onto Harvill from Harley Knox.

Building "D" has a truck entrance on the east side of the building and a truck entrance on the west side of the building. The EIR must clearly indicate if Building "D" and/or "E" will have multiple tenants as this is already creating massive tie ups during the staging of trucks into the warehouse at 17789 Harvill Ave. CARB does not allow trucks to idle for more than 5 minutes and yet trucks are allowed to idle for hours as they are waiting to enter the high cube warehouse

at 17789 Harvill Ave. Trucks are idling along Oleander Ave as they sleep in their trucks. EIR 546 does not adequately address the direction that trucks will enter the building or what streets they will use. All trucks must be directed to enter and exit onto Harvill Ave. from Oleander and travel to the Harley Knox Blvd overpass to access the I-215 Freeway. Logistics trucks from these warehouses must not be allowed to use our dangerous narrow rural roads. The EIR must include language that indicates all trucks use Harvill Ave. Decker Road must be closed to through traffic past the Project's southern boundary line. Closure of Decker Road must include barriers that prevent logistics trucks from accessing Decker Road past the southern boundary line of Building "D". This will allow EMWD to continue to access the road to the water tank.

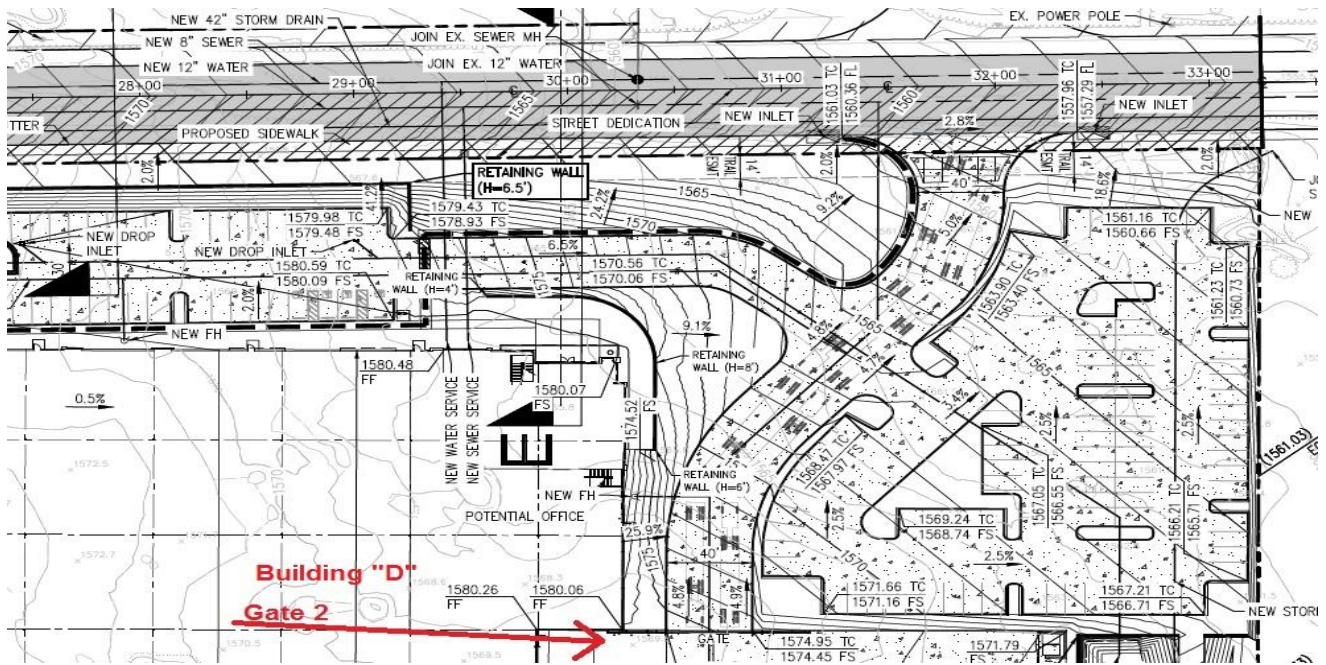


Harvill Ave. with trucks lined up to enter the warehouse at 17789 Harvill Ave.



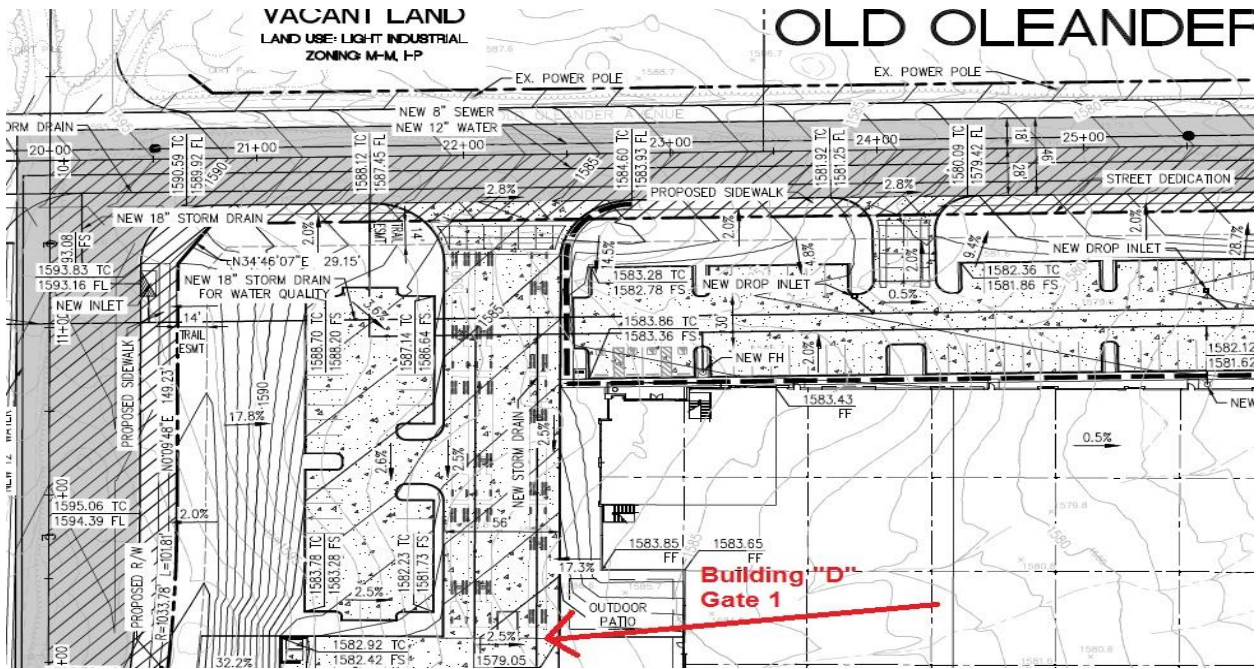


Harvill Ave. with trucks parked in the right lane and cars having to move over to the left lane. Harvill Ave was never built to County standards and is not wide enough for trucks to park along the side of the road and allow other vehicles to drive in the right lane. Harvill Ave. is the main thoroughfare for thousands of trucks that will be accessing Building “E” and “D”, current and future high cube logistics warehouses. Traffic studies for this project have not adequately addressed the number of trucks from these warehouses, impacts from these trucks, routes that these trucks will take to access the ports of LA and Long Beach, the health and safety of local residents who will be driving not only Harvill Ave, but numerous other roads that trucks from these warehouses will be using throughout the region.



Building "D" site map dated February 24, 2017 shows the east entrance along Oleander that allows just 4 trucks to queue on site behind the gate to access the building. Knox Logistics Warehouse at 17789 Harvill Ave. shows room for 7 trucks to queue on site. In addition there is a separate lane along Harvill for trucks to access this facility. Unfortunately, this is still not sufficient safe guards as over 30 trucks are attempting to enter the warehouse at 17789 Harvill Ave. at any given time during the day. This is happening everyday all day long as trucks are idling for hours and obstructing traffic creating very hazardous conditions. Idling trucks are producing far more air pollution particulates and noxious fumes.

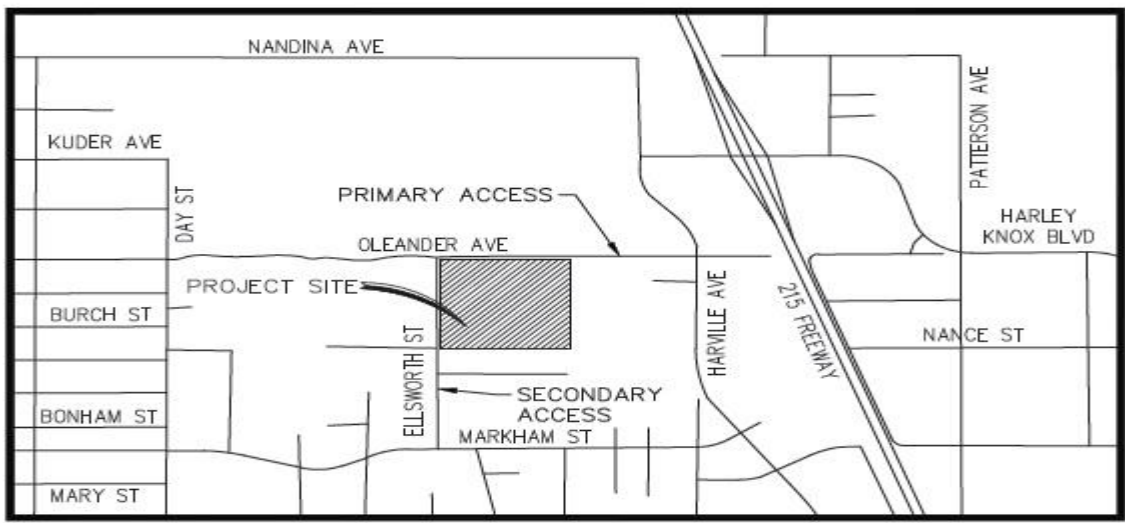
Having two gates and two separate offices one at the east side of the building and one on the west side of the building indicates that Building "D" and "E" are set up for two tenants per warehouse. This is not addressed in the EIR. Traffic studies, air quality studies, noise studies, health and safety concerns for the community are not adequately addressed in the EIR. Both Building "D" and "E" are adjacent to and very close to hundreds of rural residents.



Building D showing Gate 1 that allows 6 trucks to queue on site. Trucks will be lining up traveling west on Oleander requiring trucks to turn left into Building "D" or "E" from Oleander increasing idling time as trucks wait to enter the building and turn left.

**Seventh.**

Another issue of concern is that children are coming from Moreno Valley to Citrus Hill High School located at Markham and Wood Road. Hundreds of vehicles are traveling on Markham every day as parents take their children to and from school Monday through Friday. The cars are bumper to bumper from Harley Knox to Markham to Wood Road. This has not been addressed in the traffic study or any other portion of the EIR. Adding logistics trucks to Markham increases the pollution, noise and dangerous conditions to our residents and children.



VICINITY MAP  
N.T.S.



The site plan indicates that Old Oleander will be the Primary Access and Ellsworth / Decker will be the secondary access for trucks coming into and leaving Building D and E. This has not been evaluated in the EIR as there are a host of very serious concerns using Ellsworth / Decker Road south of the project for any logistic truck access or any type of vehicle traffic or activity.

Ellsworth Street/ Decker Road improvements as indicated in the project EIR will consist of the area from Oleander to the south property line. Decker Road from the project south property line to Markham is an unimproved dirt road that is not County maintained and therefore not adequate for heavy truck traffic. Decker Street has pot holes, speed bumps and certainly not up to any standards that would meet CEQA guidelines for this project. Issues of concern include: dust, noise, vibration, air pollution, health and safety as these trucks drive down our rural neighborhood streets. The intersection at Markham and Decker has severe line of sight obstruction as Markham goes up a hill and has an "S" curve obstructing the view of vehicles turning onto Markham from Decker Road. This road is so dangerous that K-rails were installed to keep cars from running off the road into homes. None of these adverse impacts were assessed in the EIR. There is no stop sign or signal light at Markham and Decker.



Ellsworth / Decker Street at Markham looking west. No stop sign or street sign. Just had an accident at this intersection on March 31, 2018.

Logistics Trucks for Buildings “D” and “E” will be coming down the hill on Markham using their Jake Brakes in this rural neighborhood. The noise will be intolerable and 24-7.



Markham along the top of the hill showing K-rails used to protect homes. K-rails are not going to stop a logistics truck from exiting the road along this steep grade on Markham Street. The view of the entire Perris Valley can be seen from the hill along Markham.



Day Street at Cajalco

Trucks will try to gain access onto Markham using Decker as a shortcut to Cajalco Road traveling to Day Street. Trucks will either access Harvill Ave. or Decker Road as they go to and from the ports. It is obvious that Harvill Ave is already having Level of Service issues that are

significant and should be rated LOS D. Markham is also at a level LOS E during school drop off and pick up times as cars are bumper to bumper from Harley Knox all the way to Wood Road.

### **Eighth.**

No signal lights are indicated on the EIR for intersections at Oleander and Decker Road or Decker at Markham or Markham at Day Street or Cajalco at Day Street. The EIR does not analyze the time frame for future building projects that will complete Oleander to full width. Oleander dead ends at the western boundary of Building "E".

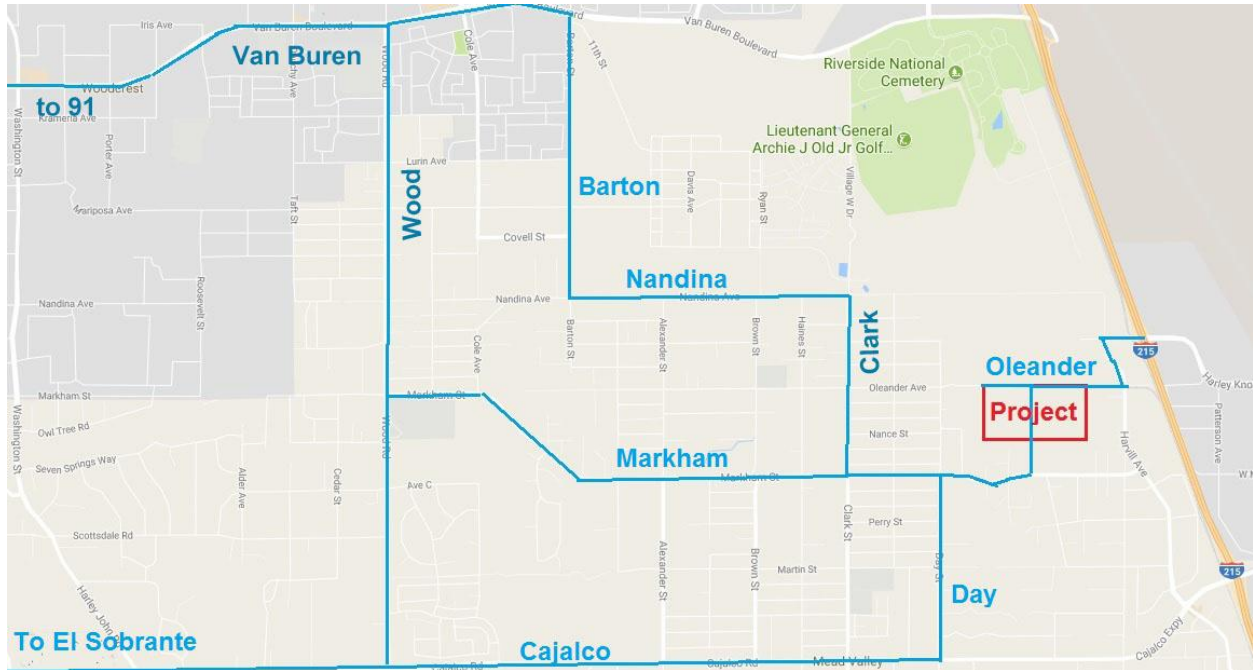
The traffic study does not address the additional truck traffic impacts to the rural communities of Mead Valley, Greater Lake Mathew and the City of Riverside. Once trucks access Markham Street they can find a number of routes that lead to Van Buren Blvd, Cajalco Road and El Sobrante instead of using the very congested I-215 and I-60 freeways to the I-91. The impacts of using other routes that transverse though rural communities has not been adequately analyzed in the EIR. There are a number of elementary schools and middle school near Cajalco and Clark Street, a library, a community center and senior center. The impacts to these sensitive receptors has not been addressed in the EIR as hundreds of trucks from the Project will be using Cajalco Road which passes a number of public facilities. Logistics trucks can be seen every day now using Clark to travel to Cajalco passing by a Middle School and Elementary School at Martin X Clark and Dawes X Clark. This was not included in the EIR traffic study.

Idling trucks have impacts on the entire region as the difference between idling for 5 minutes and 2 hours produces 24 times as much air pollution per truck. That would be 720 times as much for 30 trucks and then multiply by the hours of the day that new trucks are entering the line at 17789 Harvill Ave. Future impacts of additional warehouses and their idling trucks has not been analyzed in the EIR. This constant idling during the day with hundreds of trucks adds up to considerable health impacts that are not being addressed in the EIR. Multiple tenants are part of the problem as it takes longer to process each truck into the facility. The EIR has not addressed the impacts of multiple tenants for Building "E" and "D". The lack of lanes and turn lanes on Oleander Ave. as trucks are turning left into both Building "D" and "E". Both Building D and E need dedicated turn lanes along Old Oleander Ave and these lanes should allow for up to 30 trucks to safely access these facilities at one time. Currently building "D" allows for 10 trucks to enter and exit the facility behind the access gate.

### **Ninth.**

The EIR indicates that there is no funding and therefore no new improvements will be made along the I-215 to add lanes to the off and on ramps on Harley Knox Blvd or to the I-215 Freeway far into the future. The EIR does not address the accumulative traffic impacts due to additional future warehouses that are planned for the area along the I-215 and I-60 Freeways that will add substantial truck traffic to the freeway system. Additional high cube warehouses are planned for Sycamore Canyon Industrial Park, Meridian Business Park, Perris warehouses and Moreno Valley 40 million Sq. Ft. World Logistics Center. The City of Perris is also adding high cube warehouses to their area that will be using the I-215 Freeway.





Routes that logistics trucks from the warehouses in this project will be taking to get to the ports of LA and Long Beach. EIR 546 has not adequately evaluated the impacts of using these roads to get to the ports. Other streets would include Clark, Brown and Alexander and Wood Road.

## Tenth.

Noise is not adequately evaluated in the EIR. Noise Barriers must be reevaluated to conform to Federal Transportation Guidelines to be effective in protecting residents especially those who live next door. The EIR must provide an adequate buffer between rural homes and Building D and E. WRCOG and SCAQMD guidelines require 1000 foot buffer to adequately protect residents from the negative impacts of high cube warehouses. **Buffers must measure between the end of the property line and the warehouse parking area / driveways where trucks travel..**

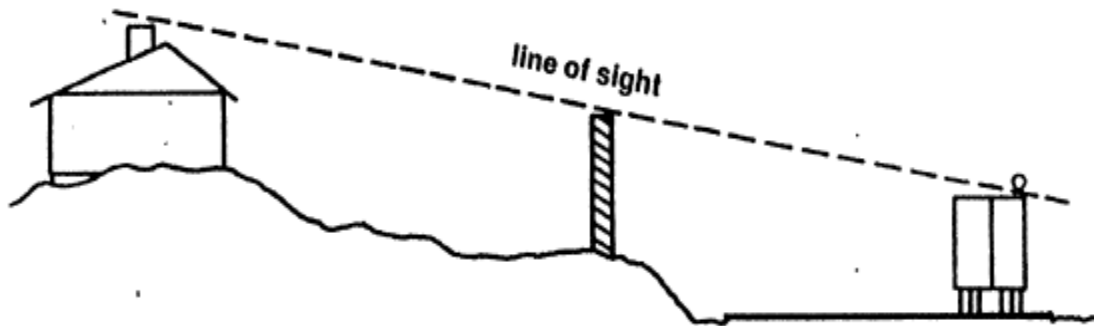
## 4.4 Barriers

A noise barrier is an obstacle placed between a noise source and a receiver which interrupts the path of the noise. They can be made out of many different substances:

1. Sloping mounds of earth, called berms
2. Walls and fences made of various materials including concrete, wood, metal, plastic, and stucco.
3. Regions of dense plantings of shrubs and trees
4. Combinations of the above techniques

The choice of a particular alternative depends upon considerations of space, cost, safety and aesthetics, as well as the desired level of sound reduction. The effectiveness of the barrier is dependent on the mass and height of the barrier, and its distance from the noise source and the

receiver. To be effective a barrier must block the “line of sight” between the highest point of a noise source, such as a truck’s exhaust stack, and the highest part of the receiver. This is illustrated in Figure 4.16.



4.16 To be effective, a barrier must block the “line of sight” between the highest point of a noise source and the highest part of a receiver.

To be most effective, a barrier must be long and continuous to prevent sounds from passing around the ends. It must also be solid, with few, if any, holes, cracks or openings. It must also be strong and flexible enough to withstand wind pressure.

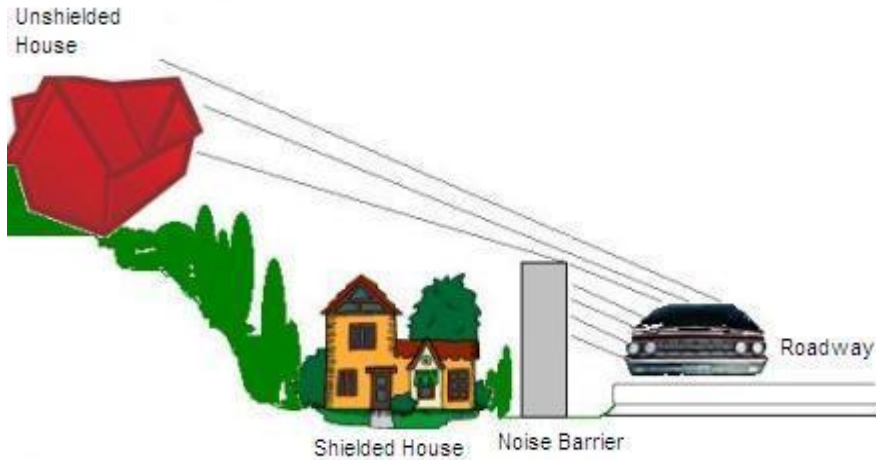
Safety is another important consideration in barrier construction. These may include such requirements as slope, the distance from the roadway, the use of a guard rail, and discontinuation of barriers at intersections.

Aesthetic design is also important. A barrier constructed without regard for aesthetic considerations could easily be an eyesore. A well-designed berm or fence can aesthetically improve an area from viewpoints of both the motorist and the users of nearby land (FHA: Physical Techniques to Reduce Noise Impacts).

[https://www.fhwa.dot.gov/ENVIRonment/noise/noise\\_compatible\\_planning/federal\\_approach/audible\\_landscape/al04.cfm](https://www.fhwa.dot.gov/ENVIRonment/noise/noise_compatible_planning/federal_approach/audible_landscape/al04.cfm)

### **Role of Topography**

To work effectively, the barrier must be high enough and long enough to block the view of the road from the area that is to be protected. Sound barriers do very little for homes on a hillside overlooking a road.



Source: FHWA Website

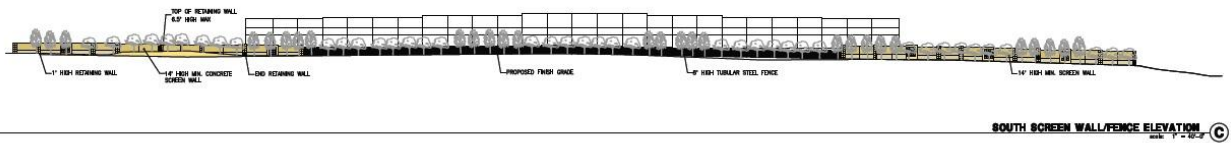
As seen above, the house at the bottom of the hill is protected by the sound barrier, but the one on top of the hill (overlooking the roadway) is not.

In addition, buildings higher than barriers, homes scattered too far apart, and openings in noise barriers for driveway connections or intersecting streets are not good areas for sound barriers. In some cases, SHA can offer alternatives to help reduce noise levels. These alternatives are evaluated on a case-by-case basis consistent with Federal guidelines (Sound Barriers Guideline – Highway Traffic Noise, <http://www.roads.maryland.gov/Index.aspx?PageId=827>)



Sound walls are up to 8' tall and smoke stacks for trucks are 11.5' tall. Buildings are being proposed lower than ground level. Because of line of sight angle from the proposed project to homes the sound walls offer little or no protection for rural residents living near this project and

uphill from this project. Sound walls/barriers are not going to be constructed the full length of the perimeter. Minimum distance sound walls will not protect rural neighborhoods surrounding this project from significant negative impacts such as sound, vibration, air pollution and light trespass. Short walls that are narrow in width are ineffective in stopping sound from the hundreds of trucks going into and out of these warehouses night and day. These impacts have not been adequately evaluated in the EIR.



Elevation for building D (above exhibit) shows metal fencing along the majority of the southern perimeter. A very narrow 14' wall is shown along the outside edges of the fence barrier. This barrier is not a sufficient to reduce noise, pollution or light trespass to a healthy level for the adjacent property owners. The EIR does not properly evaluate these barriers. Building E has these same deficiencies as the southern and western barriers are not sufficiently designed to obstruct noise, pollution and light trespass to healthy and safe levels.



Rural homes with no buffer between homes and proposed warehouses. Inadequate noise, sound, light trespass and air pollution mitigation.



## **Eleventh.**

### **E3.0 PROJECT DESCRIPTION**

#### *1. Earthwork and Grading*

Grading would occur over the entire Building E Site; no portion of the site would be left undisturbed. Proposed earthwork activities would result in approximately 80,000 cubic yards of cut and 80,000 cubic yard of fill. Based on the expected shrinkage and compaction of on-site soils, earthwork activities are expected to balance and no import or export of earthwork materials would be required.

When grading is complete, manufactured slopes ranging from approximately four to 15 feet in height would occur along the south, east, and west perimeters of the property, and the Building E property would have a slight west-to-east-slope, as depicted on Figure 3-14, *Conceptual Grading Plan – Building E Site*. After grading, the highest point of the property would be its southwest corner (approximately 1,630 AMSL) and the lowest point of the property would be at the bottom of the detention basin near its northeast corner (approximately 1,588 AMSL). To accommodate the proposed grading concept, retaining walls ranging in height from one to seven feet tall would occur on the property. Also, a mechanically stabilized earth wall up to 18 feet in height is proposed along the west and south sides of the proposed water quality basin (Knox Building Park Buildings D and E Environmental Impact Report No. 546, pg. 3-19).

The EIR does not adequately assess noise and pollution impacts along the western, eastern and southern portion of Building "E". Retaining walls will not reduce noise pollution to safe levels due to line of sight view from Building "E" to Nance Street, the western portions of Oleander and south of Building E. The description of earth walls and retaining walls is not clear as to height and location so that an adequate assessment can be made. Both Buildings D and E will be up to 14' below grade. This was not evaluated in the EIR as the height of the buildings at ground level would affect the noise impacts, air pollution, light trespass, and possible hydrology impacts from water flowing from the nearby hills and arroyos.

## **Twelfth.**

There are numerous biological and cultural resources not adequately analyzed in the EIR.

A PHASE I AND II CULTURAL RESOURCES ASSESSMENT FOR THE DECKER PARCELS II PROJECT document is outdated and no longer reflects the current cultural assessments for Building Site "E" or "D". Additional information related to this project site cultural resources was submitted to the County after April 29, 2016.

The EIR does not reflect this new information. The Soboba and Pechanga Tribes feels that the artifacts and area are very culturally sensitive. Preservation of these cultural sites (boulders) and artifacts is extremely important. Any cultural artifacts should be returned to the Saboba or Pechanga Tribes

Over 20 years ago before the water tank was built, I met with archeologist Daniel McCarthy from the UCR Eastern Research Center who went over the cultural significance of this site. The entire area proposed for Building E and D have significant cultural artifacts and are part of a pre-historic Native American Village.



The EIR does not adequately analyze rock blasting impacts to Cultural resources on and off this project site.

Biological Resources include burrowing owls, black tailed rabbits, quail, hawks and roadrunners have not been adequately analyzed and addressed. This area is part of a wildlife corridor from the Motte Reserve to the Sycamore Canyon Wilderness Park. Burrowing Owls have thrived in this area for years and their numbers are twiddling rapidly. At the present rate of habitat destruction the owls will be extinct in Riverside County is just a few years. Borrowing Owls are a species of special concern and may soon be considered for the Federal or State endangered species list.



Pictures that I took of Burrowing Owls at the Project Site on July 3, 2017. There are a number of nesting Burrowing Owls at the project site for GPA 1151 & 1152. The EIR for the Burrowing Owl study is outdated and does not reflect the current numbers, habitat and nesting pairs on the Project site. The EIR must be reevaluated for Burrowing Owls on and near the project site as months of grading and rock blasting will have negative impacts on Burrowing Owls nesting and living in the area.

As part of proposed grading activities, blasting would be necessary in hard rock areas in the southern portion of the Building D Site boundaries. Based on the excavation plans prepared on June 16, 2015, by the Henry-Ann Company, rock blasting within the Building D Site is expected to include the drilling of up to 5,253 holes in the largest area, in which small charges would be placed to fragment the rocks into smaller, crushable pieces. Approximately 112,090 cubic yards (c.y.) of rock is expected to be produced during proposed blasting activities, which would be crushed and used on the Project site as construction base. An electric rock crusher powered by a 300-horsepower diesel generator is proposed to further break down the fragmented rocks. The Project Applicant calculates that approximately 2,759 tons of rock would be processed on the Project site per day during the blasting and rock crushing phase of construction (approximately 65 working days) (Urban Crossroads, Inc, 2016a, pp. 31-32).

Rock Blasting would also need to take place on the lot for Building “E”.

The EIR greatly understates construction impacts at the site where construction is anticipated to occur for almost 2 years (23 months), eight hours a day, five days per week. Substantial blasting (drilling 5,253 holes in the largest area) and subsequent rock crushing operations would be necessary to crush approximately 2,759 tons of rock onsite per day for 65 days. Rock crushing and blasting was not adequately considered in the EIR terms of impacts to hazards, noise/vibration, cultural resources, and biological resources.

Rock blasting and construction impacts on Burrowing Owls within the area between Harvill, Day Street, Nandina and Markham have not been adequately considered especially during the nesting

season. Burrowing Owls, a California Species of Special Concern, live in the ground on the site of this Project and would be greatly impacted by the vibrations and noise from months of constant rock blasting. Owl reproduction may cease altogether. Fledglings may be greatly impacted by the noise and vibration. The Burrowing Owl habitat will be destroyed and the birds will die.

The EIR does not address night time construction mitigation measures as warehouses are concrete tilt up buildings where the concrete is poured at night. Light trespass, noise and dust are a big concern and have been a huge problem with a current high cube warehouse now under construction by this same company nearby. Many wildlife are nocturnal and would be adversely impacted by night time construction lighting and noise.

**Thirteenth.**

### **3.5 OPERATIONAL CHARACTERISTICS**

"At the time this EIR was prepared, the future user(s) of proposed Buildings D and E were unknown; however, the Project Applicant expects the buildings to be occupied by high-cube warehouse users. The proposed warehouse buildings are not designed to accommodate an occupant that requires cold storage (i.e., refrigeration); therefore, the analysis in this EIR assumes that the proposed buildings would not house a tenant that uses cold storage" (SCH No. 201508108, Page 3-31).

There are indications that both Buildings "E" and "D" will be leased and will have multiple tenants and therefore should require refrigerated hook-ups. There is no way to predict who will be leasing these buildings over the years. With four tenants the chances that cold storage will be needed is fairly high. Both buildings have multiple office spaces and entrances with entrance gates. It would be very easy to divide these buildings in half with a wall so that you would in affect have two leased facilities. The EIR does not assess the impacts of (4) tenants leasing the buildings instead of two. The added impacts from creating 4 facilities instead of 2 needs to be thoroughly evaluated in the EIR. The current warehouse at 17789 Harvill Ave. has tenants that use cold storage. The EIR is flawed in its lack of analysis for cold storage uses and refrigerated hook-ups.

**MM 4.3-3 (Applies to the Building D Site and the Building E Site)** Within six months of building occupancy, signs shall be posted at the building informing truck drivers about the health effects of diesel particulates, the California Air Resources Board diesel-fueled vehicle idling regulations, and the importance of being a good neighbor by not parking in residential areas. Developer and all successors shall include this obligation in all leases of the Project so that all tenants shall fulfill the terms and conditions of this County condition of approval (Knox Business Park Bldgs D and E EIR-4, page S-18).

Violations of MM 4.3-3 are taking place at Knox Business Park warehouse at Old Oleander and Harvill Ave. with a large number of trucks idling for hours, trucks parking along streets next to homes with their trucks idling as the truck drivers sleep, truck trailers and trucks parked outside of the truck parking stalls and along the north end of the warehouse at 17789 Harvill Ave. There is no enforcement of these rules. EIR 546 must include a detailed accounting of how

enforcement of these mitigation measures will be addressed.

#### **Fourteenth.**

Fire access appears to be lacking with all fire access through the entrance gates on the north side of Building "E" and "D". What will be stored in these facilities over time? There are a number of hazardous materials that could pose serious health and safety concerns if they were to catch fire, explode or spill. This problem is magnified considering the distance from a number of neighborhoods adjacent to Building "D" with no buffer between homes. There are just three entrances at the north end along Old Oleander Ave. There appears to be a lack of access along the east, west or south of buildings E and D. With the steep slopes up to 17', water basins blocking the east side and residents along the south side of these buildings it appears that fire access would be difficult if trucks are lined up along the entrances. The EIR does not evaluate fire access concerns due to limiting access to the north side of the buildings.

Cal -Fire letter states: "The Riverside County Fire Department would also like to comment that, The Proposed project will have a cumulative adverse impact on the Fire Department's ability to provide an acceptable level of service. These impacts include an increase in the number of emergency and public service calls due to the increased presence of structures, traffic and population. The project proponents/developers will be expected to provide for a proportional mitigation to these impacts via capital improvements and/or impact fees." (Bill Lawe Fire Captain Cal Fire/ Riverside County Fire Department Strategic Planning Division).

#### **Fifteenth.**

##### **Jobs.**

"Because users of the Project's buildings are not yet known, the number of jobs that the Project would generate cannot be precisely determined; therefore, for purposes of analysis, employment estimates have been calculated using data and average employment density factors utilized in the County of Riverside General Plan. The General Plan estimated that light industrial business would employ one (1) worker for every 1,030 s.f. of building area. Based on this employment generation rate, the Project is expected to create approximately 1,081 new, recurring jobs" (1,113,627 s.f. ÷ 1,030). (Riverside County, 2016 Appendix E, Table ES-5). SCH No. 201508108, Page 3-32.

The General Plan job estimates are completely outdated and obsolete as most logistics high cube warehouse facilities are moving toward complete automation and robotic technology that requires just a handful of employees to run a huge logistics warehouse facility. This technology will soon be fully functioning in the logistics industry. Building "E" and "D" for massive logistics warehouses attempts to replace the current Business Park land use zoning (Riverside County General Plan – Mead Valley Area plan) that actually creates a large number of real permanent jobs versus the massive logistic warehouses that will have a handful of tech employees that repair and maintain the equipment and software, a few managers and office staff.

The EIR does not address the true estimates of jobs being created by this Project. A true estimate is difficult to predict, but it is a fact that within the next few years and very possibly by the time that these warehouses are built, the automation and robotic technology will have

eliminated a large portion of the 1,081 jobs estimated to occur. It is hard to know if trucks will be driverless, but certainly the workers within the facilities will be very limited in numbers. The EIR for this project is extremely flawed in the assumption that over 1,000 jobs will be created.

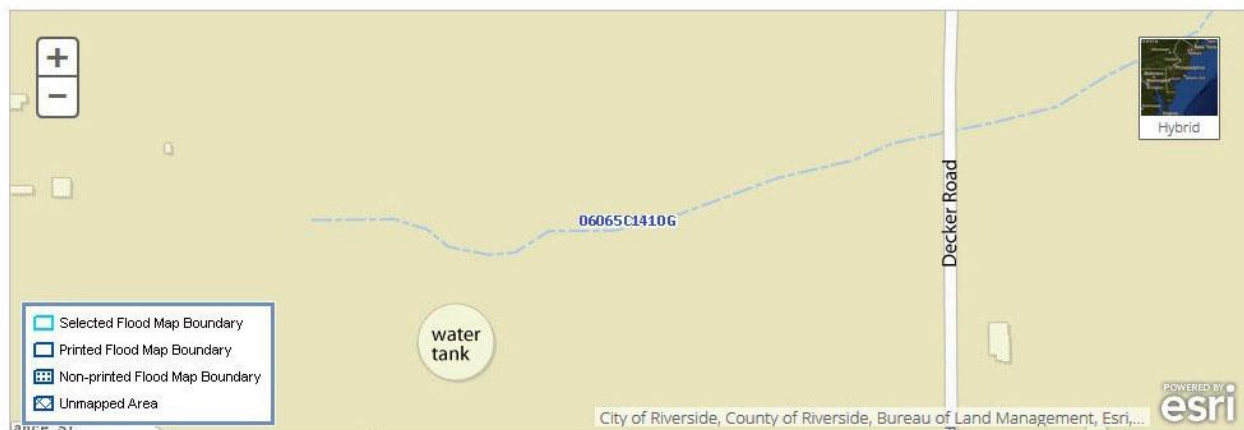
"Envision a self-guided forklift streaming down a narrow aisle, feeding inventory into a rack system towering 40 feet above the warehouse floor, while an auto-guided mini-robot transports outbound inventory to fulfillment stations lit up like holiday lights, enabling order processing of up to 2,400 picks per hour. As the perfect order is complete, a high-speed conveyor shuttles packages toward a stationary robot, which loads the contents into a driverless tractor-trailer. Could this be a look into the warehouse of the 22nd century? Nope, it's the modern distribution center of today" (Warehouse Automation: The Next Generation by Charlie Fiveash, January 27, 2016, Inbound Logistics).

### Sixteenth.

Blue Line Stream - Any stream shown as a solid or broken blue line on 7.5 Minute Series quadrangle maps prepared by the U.S. Department of the Interior Geological Survey (USGS). A blue line stream may be any creek, stream or other flowing water feature, perennial or ephemeral, indicated on USGS quadrangle maps, with the exception of man-made watercourses. The United States Army Corps of Engineers uses USGS blue line stream markings as a preliminary indicator of "Waters of the United States". Streams identified on USGS maps in such a manner are therefore generally subject to federal environmental regulations. (Riverside County Flood Control) <http://www.floodcontrol.co.riverside.ca.us/GlossaryTerms.aspx>

## FEMA Flood Map Service Center : Search By Address

### Locator Map



Riverside County Flood Map clearly shows a blue line stream traversing across the entire Project site. The blue line stream is part of the wetlands to the west of the project site. All of this is subject to "waters of the United States" are therefore generally subject to federal environmental regulations. The EIR does not adequately analyze the impacts of the blue line stream, hillside arroyo, riparian habitat or the year round stream coming out of the granite cave.

EIR is clearly flawed in their assessment of a Blue line Stream as this stream runs through the entire Project site.

“Erosion Threshold (a) for the Building D Site and Building E Site: No Impact. The Project site does not contain any active streams or rivers, no streams or rivers are located in close proximity to the Project site, and the Project would not discharge water directly to an active stream or river. The Project would be required to prepare and comply with NPDES permits, SWPPPs, and WQMPs, which would treat and filter runoff to reduce erosion. Therefore, no impact to deposition, siltation, or erosion that may modify the channel of a river or stream or the bed of a lake would occur” (Knox Building Park Bldgs "D" and "E" EIR NO. 546, S.0 EXECUTIVE SUMMARY, pg. S-38).

### **Seventeenth.**

The EIR does not include the WRCOG and SCAQMD good neighbor policy that sets a 1000 foot buffer between sensitive receptors and distribution warehouses. The current proposal for Building "D" has the warehouse project directly next to homes. No setback or buffer as trucks will be traveling from the east side of the warehouse to the west side of the warehouse using a driveway just a few feet from rural property lines. Small walls along the parking spaces will not prevent air pollution or noise from back up beepers, the hazards and dangers of noise pollution, air pollution, vibration and light trespass 24-7. Trucks are able to park outside of the parking stalls along the southern driveway as is occurring right now at the logistics warehouse at Harvill Ave. and Oleander. (WRCOG Good Neighbor Policy Guidelines for Siting Warehouse/Distribution Facilities). [Good Neighbor Guidelines for Siting Warehouse/Distribution Facilities.](#)



Warehouse at Oleander X Harvill has numerous trucks parked outside of the parking stalls along the north side of the building. Trucks are idling along this area, unloading, back up beepers going off day and night. GPA 1151 & 1152 proposed project has this same style of driveway along the south of Building "D" directly adjacent to rural homes. The EIR does not address parking issues



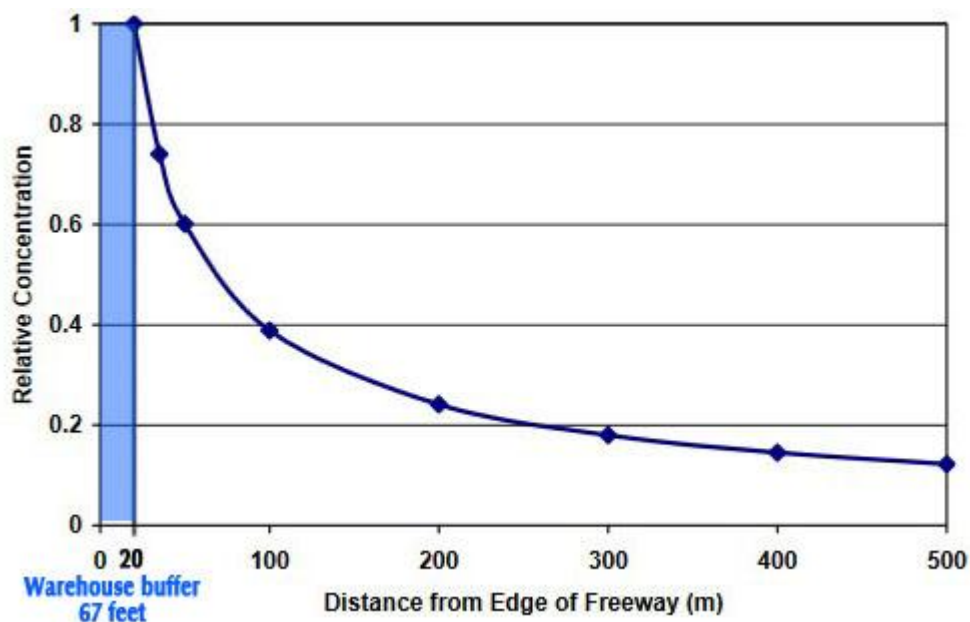
such as this, trucks backed up onto local roads idling for hours as they arrive to unload their goods. Trucks parked in the middle of the road as Harvill was not designed for trucks to park on the shoulder. These same conditions exist for Building "D" and "E" with trucks having to turn left to enter the buildings and limited truck queuing space at the warehouse entrance behind the guard shack. Multiple tenants add to flaws in project design and analysis.

The SCAQMD recommends prohibiting placement of loading docks or major truck routes within 500 meters or 1640.42 feet from sensitive receptors. (See, <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/chapter-2---air-quality-issues-regarding-land-use.pdf?sfvrsn=2> ).

### **Eighteenth.**

Decker Road a rural dirt road and would be changed into a truck highway with the approval of this project. The EIR has not addressed or analyzed any of the impacts from trucks using Decker Road to access Markham that allows logistics trucks to drive throughout our quite rural neighborhoods to get to the I-91 Freeway instead of using Harvill to get to the I-215 Freeway. Harvill Ave. has always been promised to the community of Mead Valley as the only access route for warehouse trucks and these trucks would access the I-215 Freeway and not our rural roads.

The EIR for this project changes everything as trucks are designated to use Decker Road as a secondary access for trucks travel. Decker Road currently only travels to Markham Street. The EIR does not analyze the impacts of Decker Road as a secondary route for logistics trucks for this Project. Increased idling time, air pollution and noise impacts throughout the area.



<http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/chapter-2---air-quality-issues-regarding-land-use.pdf?sfvrsn=2>

Residents and those using the church including children and seniors living nearby will be greatly impacted by the huge concentrations of ozone and particulate matter from the hundreds trucks using this facility every day. Particulate matter is very small and enters the lungs, brain and cells affecting the young weakening lung function. In Southern California, 5,000 premature deaths every year are attributed to air pollution and particulate matter from diesel trucks.

## **Nineteenth**

### **Article from SCAG.**

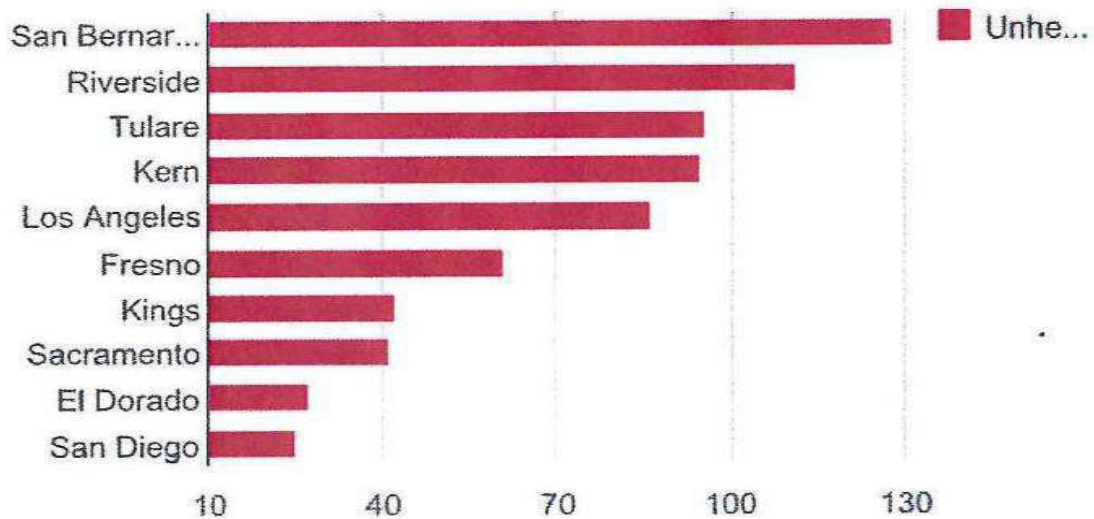
#### **What is Environmental Justice?**

Environmental Justice is about equal and fair access to a healthy environment, with the goal of protecting underrepresented and poorer communities from incurring disproportionate environmental impacts. The SCAG region is demographically and economically diverse, and displays the extremes in household income. The region includes heavily urban and entirely rural areas, as well as terrain that in some instances make achieving air quality goals challenging.

Considerations of Environmental Justice are both good planning practices as well as to meet the federal and state requirements. The federal requirements originated from Title VI of the Civil Rights Act of 1964 (Title VI). Title VI establishes the need for transportation agencies to disclose to the public the benefits and burdens of proposed projects on minority populations. The understanding of civil rights has then been expanded to include low-income communities, in addition to minority populations. In addition to federal requirements, SCAG must comply with California requirements for Environmental Justice. ([www.scag.ca.gov/programs/Pages/EnvironmentJustice.aspx](http://www.scag.ca.gov/programs/Pages/EnvironmentJustice.aspx)).

Mead Valley qualifies as an underrepresented and poor community under Title VI of the Civil Rights Act of 1964 (Title VI) with 72% of the residents of Mead Valley being Hispanic or Latino and over 43% of Mead Valley residents living below the poverty level according to the 2010 Census. The EIR does not address Environmental Justice and the impacts on Mead Valley as a minority community.

## Most ozone polluted counties in the U.S.



Source: American Lung Association

### Twentieth.

The EIR is not in line with the Riverside County Vision and Mead Valley Area Plan.

#### *Riverside County Vision*

The simplest way to summarize our vision for Riverside County is to say that:

*“Riverside County is a family of special communities in a remarkable environmental setting.”*

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

Certainly this current proposed project is not in line with the vision set forth by the residents of Mead Valley through the Riverside County General Plan and Mead Valley Area Plan.

The current General Plan land use for Mead Valley is overwhelmingly rural community designation: Estate Density Residential, Very Low Density Residential and Low Density Residential. The Mead Valley Area Plan shows most of the zoning for proposed Building "D" and "E" to be Business Park that allows for a buffer between residential and businesses.

Page 52. MVAP 21.1 Identify ridgelines that provide a significant visual resource for the Mead Valley planning area through adherence to the policies within the Hillside Development and Slope section of the General Plan Land Use Element.

[http://planning.rctlma.org/Portals/0/genplan/general\\_plan\\_2013/1%20General%20Plan/Chapter%203-Land%20Use%20Element%20Adopted-Final%20Clean.pdf](http://planning.rctlma.org/Portals/0/genplan/general_plan_2013/1%20General%20Plan/Chapter%203-Land%20Use%20Element%20Adopted-Final%20Clean.pdf)

### **Hillside Development & Slope**

Natural slopes are one of Riverside County's primary aesthetic resources. Foothill and mountain areas, which are visible throughout the County, create a dramatic backdrop for local communities and help define the character of the County.

Hillside areas also provide an important location for habitat as well as for certain lifestyle choices. In addition, there are public safety issues, such as slope failures, landslides, and mudslides, that occur naturally or as a result of development, grading, and landscaping. The severity of these slopes, the ability to provide infrastructure and services (such as transportation, water, sewer, etc.), and safety considerations can drastically alter the use and development potential of individual properties.

Development on hillsides within the County, where land use designations permit, will require careful siting, grading, and design in order to minimize exposure to hazards and to maintain and enhance the scenic quality of the County (Page LU-34).

EIR does not adequately address the Hillside Development and Slope Land Use Element of the General Plan. Hillside areas are important locations for wildlife habitat and to preserve the scenic quality of the County.

- EIR is fatally flawed. Building "D" and "E" are two separate high cube warehouses being considered as one project. **This type of piecemealing or segmentation is not allowed under CEQA. Therefore EIR 546 must be revised and recirculated so that this error to piecemeal the project can be corrected.**
- The EIR assessment for Building "E" on the west side of Decker road has been modified substantially in the number of the parcels and size of the building. Modification to the EIR for Building "E" describe different scenarios in regards to traffic flow, differing elevation height measurement of the building and various other inconsistencies that effect every aspect of the Draft Environmental Impact Report.
- Future Trammel Crow project phases are not included in the EIR for this project as required by CEQA. The impacts of future high cube warehouses for the area such as truck traffic, noise, air pollution, light trespass, etc. have not been adequately evaluated.
- EIR 546 does not adequately address the impacts of air quality, noise, truck traffic impacts to sensitive receptors (rural residential property) that abuts this project. EIR 546 not only fails to meet CEQA guidelines, but also falls short of the Riverside County General Plan - Mead Valley Area Plan and General Plan Vision for land use with NO buffer between sensitive receptors and Building "D" as well as sensitive receptors a short distance away in the nearby hills to the west and south. The EIR must address air quality, including a health risk assessment of diesel particulates and impacts to sensitive receptors, truck traffic and noise, and the cumulative impacts of reasonably foreseeable warehouse development in the area (Mead Valley Area Plan, pg. 32).

- Truck and vehicle traffic is not adequately addressed in the EIR. Two main entrances along Oleander are indicated on Building "D" & "E" Site Plans. These plans also indicate two distinct offices with one at the northwest and one at the northeast corners of Building "D" & "E". This indicates that buildings "E" and "D" will have more than one tenant. Impacts from multiple tenants are not addressed in the EIR. Similar warehouse at 17789 Harvill owned by Trammel Crow has multiple tenants which is creating a number of serious violations of CEQA and CARB. Trucks idling for hours as they are queuing to enter the facility. Lining up in the roadway of Harvill Ave. blocking traffic. Idling within the facility for hours. Parking in unauthorized areas because truck trailer parking is full.
- Ellsworth Street / Decker Road is set as the secondary access for Building "E" and "D". EIR fails to adequately evaluate and disclose project impacts from allowing truck access past the improved sections of Ellsworth / Decker Road. This is an unimproved dirt road with pot holes, speed bumps and uneven surfaces that is certainly not up to any standards that would meet CEQA or AQMD guidelines for noise, dust, vibration and air quality.

Additional issues of concern include: dust, noise, vibration, air pollution, health, light trespass, and safety as these trucks drive down our rural neighborhood streets. The intersection at Markham and Decker has severe line of sight obstruction as Markham goes up a hill and has an "S" curve obstructing the view of vehicles turning onto Markham from Decker Road. Markham is so dangerous that K-rails were installed to keep cars from running off the road into homes. Trucks will be using Jake Brakes going up and down the hill on Markham 24-7. None of these adverse impacts were adequately evaluated in the EIR.

- Portions of Ellsworth / Decker Road must be closed to Truck traffic going south from Building "E" and "D" due to adverse impacts from truck traffic in a rural residential neighborhood. Guard rails need to be installed to close the road to through truck traffic.
- The EIR underestimates the impacts of having one access road if Decker / Ellsworth is closed off to truck traffic. Oleander is listed as the primary access road. Oleander intersects Harvill Ave. passing the warehouse at 17789 Harvill Ave. that is currently receiving a number of complaints due to serious CARB violations. Trucks idling on and off the premises for hours. Trucks parking in unauthorized areas instead of truck parking spaces. Trucks that are idling next to a residential home for hours. Trucks in the middle of the road blocking traffic as they try to line up to get into the facility. These impacts have not been addressed or evaluated in EIR 546.
- EIR is inconsistent in the analysis of the buildings height, slopes, sound walls, noise pollution, and air pollution. The EIR underestimates the impacts of Truck traffic to the communities of Mead Valley, Orangecrest, Woodcrest and Greater Lake Mathews and city of Riverside. Allowing Decker / Ellsworth as the secondary access encourages heavy truck traffic to travel throughout our rural communities using local country roads and highways.



- USGS Blue line stream traverses through the entire length of the project site. Wetlands are part of the streambed. The EIR does not adequately address this stream “Waters of the State”.
- The EIR does not adequately address rock blasting noise and vibration for months directly next to homes with inadequate notice.

This proposed change is an assault on our rural equestrian lifestyle. Proposed General Plan Amendments and zone changes propose to change land use from rural to industrial zoning instead of Business Park and inside of our rural equestrian community next to homes. Eliminating critical trails. These logistics distribution warehouses will destroy the quality of life for not only residents in Mead Valley, but for the entire region as the accumulation of massive logistics warehouses and their logistics trucks creates havoc on our local roads, increases noise pollution beyond the allowable state standards, adding to the worse air pollution in the nation, decreases the level of service LOS on our roads to "E" and "F" which is far below state standards. Noise levels from backup beepers, trucks idling and trucks moving along Oleander and Decker are above the threshold of allowable CEQA standards. Using rock blasting for months on end directly next to rural homes, cultural and biological resources have not been adequately evaluated in the EIR. The area along Day and Nance is known for its tremendous scenic view of the mountains and hills from Moreno Valley to Perris Valley and beyond will be destroyed. These scenic resources were not analyzed in the EIR.

### **Conclusion**

**The Staff Report has numerous errors, conflicting statements, missing information and reports, and is impossible to understand. Therefore we ask the Board of Supervisors to continue this item.**

EIR 546 is fatally flawed and must be substantially revised and recirculated to correct numerous and significant flaws, errors and omissions much of which are included in this letter. Additional mitigation measures will need to be included into any future Environmental Impact Reports regarding GPA 1151 & GPA 1152.

The Rural Association of Mead Valley is totally opposed to this proposed project Knox Business Park Buildings D & E, General Plan Amendments GPA 1151 & 1152 and opposed to zone changes from Business Park land use to Industrial Park so that two massive logistics warehouse can be built directly next to homes in the middle of our rural community.

Sincerely,



Debbie Walsh  
President, Rural Association of Mead Valley

**From:** Maxwell, Sue  
**Sent:** Monday, April 30, 2018 4:52 PM  
**To:** COB-Agenda (COB-Agenda@rivco.org); George Johnson (GAJohnson@RIVCO.ORG); Leach, Charissa (cleach@RIVCO.ORG); Perez, Juan (JCPEREZ@RIVCO.ORG); Young, Alisa; District 4 Supervisor V. Manuel Perez (District4@RIVCO.ORG); District2; District3; District5; Supervisor Jeffries - 1st District (district1@rivco.org)  
**Cc:** Russell Brady (rbrady@RIVCO.ORG)  
**Subject:** May 1 2018 Agenda Item 18.1 Public Comment Opposing GPA Nos 1151 and 1152 in Mead Valley Development (Debbie Walsh)  
**Attachments:** DebbieLetter\_1151-1152\_BOS\_May1Final.pdf

**Tracking:**

Recipient	Read
COB-Agenda (COB-Agenda@rivco.org)	
George Johnson (GAJohnson@RIVCO.ORG)	
Leach, Charissa (cleach@RIVCO.ORG)	Read: 4/30/2018 4:58 PM
Perez, Juan (JCPEREZ@RIVCO.ORG)	Read: 4/30/2018 5:00 PM
Young, Alisa	
District 4 Supervisor V. Manuel Perez (District4@RIVCO.ORG)	Read: 4/30/2018 4:59 PM
District2	
District3	
District5	
Supervisor Jeffries - 1st District (district1@rivco.org)	
Russell Brady (rbrady@RIVCO.ORG)	Read: 4/30/2018 5:01 PM
Maxinz-McLellan, Claudia	Read: 4/30/2018 4:58 PM

Good afternoon,

Attached is a 56-page email received via COB in opposition to the May 1, 2018 Item 18.1 (MinuteTraq No 6810) related to the Mead Valley Community Development Project.

The attachment will be saved and added as Back-up to the Agenda Item.

Thank you kindly,

*Sue Maxwell*  
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**From:** Debbie Walsh [mailto:abilene149@gmail.com]  
**Sent:** Monday, April 30, 2018 4:06 PM  
**To:** COB <COB@RIVCO.ORG>  
**Subject:** Agenda Item 18.1 - Knox Business Park - Building D & E Project

Please find the attached letter for Agenda Item 18.1 - Knox Business Park - Building D & E Project.

Please let me know if you have any questions.

Debbie Walsh  
 951-317-6868  
[abilene149@gmail.com](mailto:abilene149@gmail.com)

**Law Offices of Abigail Smith**

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April 30, 2018

**VIA E-MAIL AND U.S. MAIL**

Riverside County Board of Supervisors  
4080 Lemon Street, 5<sup>th</sup> Floor  
Riverside, CA 92501  
[cob@rcbos.org](mailto:cob@rcbos.org)  
[rbrady@rivco.org](mailto:rbrady@rivco.org)

**Re: Opposition to Knox Business Park Buildings D and E Project – Board of Supervisors Meeting May 1, 2018: Item 18.1**

To the Riverside County Board of Supervisors:

On behalf of concerned area residents and RAMV.org, I submit these comments regarding the Knox Business Park Buildings D and E Project which is **Item 18.1 on the May 1, 2018** Board Agenda. This letter incorporates by reference RAMV.org's previous written and verbal comments on the Project.

We respectfully submit there are a number of reasons that justify the *continuation* of Item 18.1 to a future Board of Supervisors meeting.

**A. The Proposed Approvals Are Uncertain, Incomplete and/or Inconsistent with Project Notices and the Final EIR.**

In reviewing the Revised Board Agenda and supporting information including the Submittal/Staff Report, it appears there are a number of discrepancies with and/or changes to the proposed approvals that warrant a continuation of this item.

First, the Revised Board Agenda does not include certification - or tentative certification - of the EIR as one of the listed actions. The Submittal/Staff Report recommends tentatively certifying the EIR; however, the Revised Agenda description does not include this action (it only states the EIR number, *see* Exhibit A hereto). Please compare the Revised Agenda description for the second public hearing item on the same Agenda, which includes the "intent to adopt" language.

Second, Staff is recommending tentative *approvals* of the EIR, General Plan Amendments, and zone changes, yet the resolutions, ordinances, and findings for Board

6810  
5/1/18 18.1

consideration are not included in the Agenda package or the Submittal/Staff Report. See Agenda package.<sup>1</sup> Decision-makers cannot approve the Project including certification of the EIR without the resolutions, ordinances, CEQA Findings of Fact and Statement of Overriding Considerations. See State CEQA Guidelines §§ 15090 (a), 15092 (a), 15091 (a), 15903 (b). Moreover, the public has no opportunity to review or comment on this documentation including the CEQA Findings of Fact and Statement of Overriding Considerations, which are typically provided in the approving resolution. However, for the Plot Plans, the Submittal/Staff Report recommends *approval*; it seems the Plot Plans should also be tentative approvals, to be finalized at a later date, concurrently with the other actions.

Third, the Plot Plan approvals require findings that the approvals are consistent with the General Plan and Development Code (Ordinance 384 § 18.30 C.1), therefore, the findings for the Plot Plans cannot be supported without the amendments and zone changes. In other words, the GPAs must be “approved” at the same time as the Plot Plans. Also, the Board cannot take action to approve the Project without first certifying the EIR. See State CEQA Guidelines §§ 15090 (a), 15092 (a), (b), 15091 (a), 15903 (b).

Fourth, the supporting documents include a April 11, 2018 letter from the applicant asking to eliminate the Tentative Parcel Maps (TPMs) from the Project approvals. It appears that the applicant believes that it can do mergers and/or lot line adjustments instead. The improvement conditions are typically tied to the subdivision. To the extent this is the case here, without updated conditions for the new complement of Project approvals, the public has no reasonable way of knowing which of the draft conditions disclosed in the Planning Commission materials continue to apply.

Fifth, the public has not been adequately informed of the change to the approvals in terms of the applicant’s recent request to “drop” the TPMs. The Project approvals are generally described as follows:

#### Building D

- General Plan Amendment No. 1151 (GPA 1151)
- Change of Zone No. 7872 (CZ 7872)
- **Tentative Parcel Map No. 36950 (PM 36950)**
- Plot Plan No. 25838 (PP 25838)

#### Building E

- General Plan Amendment No. 1152 (GPA 1152)
- Change of Zone No. 7873 (CZ 7873)
- **Tentative Parcel Map No. 36962 (PM 36962)**
- Plot Plan No. 25837 (PP 25837)

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<sup>1</sup>[http://riversidecountyca.iqm2.com/Citizens/Detail\\_LegiFile.aspx?Frame=&MeetingID=1812&MediaPosition=&ID=6810&CssClass=](http://riversidecountyca.iqm2.com/Citizens/Detail_LegiFile.aspx?Frame=&MeetingID=1812&MediaPosition=&ID=6810&CssClass=)

This hyperlink and all hyperlinks cited herein are fully incorporated by reference.

The Revised Board Agenda (Item 18.1) (Exhibit A) states that TPMs are part of the approvals being considered by the Board. The TPMs are in fact part of the Board package (Attachments I and J). Likewise, the Notice of Public Hearing (attached hereto as Exhibit B) states that the Board hearing will be held to consider the TPMs among the other approvals. These notices are apparently incorrect as the applicant has requested that the TPMs be “dropped” and the TPMs have in fact been dropped from Staff’s recommended actions. Yet the Submittal/Staff Report still describes the Project as including the TPMs:

**“TENTATIVE PARCEL MAP NO. 36950** proposes a Schedule H subdivision of 37.08 gross acres to consolidate the existing four parcels into one parcel and provide for public right-of-way dedication on Oleander Avenue and Ellsworth Street. Although defined as a Schedule H subdivision, in accordance with Section 3.1.B. of Ordinance No. 460, the subdivision is being required to provide Schedule E improvements that are more consistent with the industrial nature of the development. The Schedule E improvements are greater than those of a Schedule H subdivision.

**TENTATIVE PARCEL MAP NO. 36962** proposes a Schedule E subdivision of 21.52 gross acres into two parcels, one for the proposed development and one to be left vacant at this time, and provide for public right-of-way dedication on Oleander Avenue and Ellsworth Street.” *See Exhibit C hereto.*

As a result of these inconsistencies, the item should be continued and the public notice re-circulated. The Board Agenda should also be revised to include a correct list of pending actions.

In addition, the Final EIR’s Project Description (Table 3-2) lists the TPMs, meaning that the Project Description has apparently *changed* since the Final EIR. Notably, the Final EIR states that the TPMs are one of the actions that “would be necessary to implement the proposed Project.” The Final EIR lists and describes TPM 36963, *e.g.*, Figure 3-13 for Building E. The Final EIR states that the Project proposes to consolidate the three parcels on the Building E site into one, approximately 19.5-net-acre parcel. The Final EIR also describes the Project as including TPM No. 36950 for Building D, which proposes to consolidate the four parcels on the Building D site into one, approximately 34.5-net-acre parcel. State CEQA Guidelines § 15124 (d)(1)(A) states that the EIR’s Project Description shall include a “list of permits and other approvals required to implement the project.” The Project Description inaccurately lists the Project as including the TPMs and it does not include the new “substitute” approvals, which are only vaguely mentioned in the Submittal/Staff Report released days before the final public hearing on the Project.

Sixth, it is not clear that the Project can be processed without the parcel maps. Riverside County Ordinance 460 applies to the subdivision of land. There are multiple existing parcels associated with each of the building sites and the applicant proposes to consolidate these parcels to create new parcels. The Submittal/Staff Report notes that the County and applicant have (recently) engaged in discussions “on alternative methods to consolidate parcels and shift lot lines via a Parcel Merger and Lot Line Adjustment.” These approvals should be included with the Project

before the Board as well as fully disclosed to the public. The Planning Commission Submittal/Staff Report has a discussion of “Ordinance No. 460 Consistency”. The Staff Report notes that “Staff has proposed and the applicant has agreed to comply with Schedule E subdivision requirements, which are greater than those of a Schedule H subdivision.” The County is now back-tracking on “Ordinance 460 consistency.” Furthermore, according to the County’s lot line adjustment application form, a lot line adjustment can only be approved if *inter alia* “no new parcels are created and no existing parcels are deleted.”<sup>2</sup> Would not the Project be creating two new parcels and deleting the existing parcels (APNs)? The EIR describes for example that TPM 36950 proposes to *consolidate the four parcels* on the Building D site into *one*, approximately 34.5-net-acre parcel. A lot line adjustment may be precluded for other reasons including that in reality the applicant would be seeking a lot line adjustment for more than four parcels for the single “project.” Indeed, the public cannot understand the new permits/approvals that are being considered since there is merely a mention of these substitute approvals in the Submittal/Staff Report.

Seventh, the proposed conditions of approval are not part of the Board’s Agenda Package/Submittal so that the public cannot verify which conditions are proposed for inclusion.

In sum, a continuation of the hearing is necessary to update the public notices, Board Agenda, Submittal/Staff Report, and the Final EIR.

**B. The Public Cannot Understand What Is Being Proposed for Ellsworth/Decker Road South of the Project Boundary.**

The Staff presentation to the Planning Commission has a slide showing that Ellsworth/Decker Road will be left unimproved south of the Project boundaries. The Conditions of Approval (memorandum) April 2, 2018 state otherwise:

Page 1 Conditions from Transportation were revised to address alternative secondary access as required by the Tentative Parcel Map consistent with Ord. 460 requirements and consistent with the areas analyzed in the project's EIR.

Both TPMs require that condition.

Will Ellsworth/Decker Road be improved or left in its currently unimproved condition? It is unclear from the available information. The public simply cannot understand what the County is requiring with respect to Ellsworth/Decker Road south of the Project site. This information is immensely important to local residents. And if Ellsworth/Decker Road is not improved, will the Project still be required to have secondary access “consistent with Ord. 460 requirements and consistent with the areas analyzed in the EIR”?



Furthermore, we reiterate that it is simply unreasonable for the EIR to assume that no trucks will use Ellsworth/Decker Road south of the Project site. The EIR's traffic and noise sections must assume that trucks will use this roadway whether or not improved. Final EIR Response to Comment ASE-9 suggests that the "County has added a condition on the Project that will restrict heavy vehicles through a weight restriction, from traveling on Decker Road (Ellsworth Street) south of Oleander Avenue." In fact, the Submittal/Staff Report indicates that Staff is recommending that the applicant file a request with the Riverside County Transportation Department to install weight limit signs to restrict trucks with gross vehicle weight rating over 14,000-lbs from traveling on Decker Road south of Oleander Avenue. If this condition is imposed, it is a step in the right direction, however, the community desires assurance that the County will weight restrict Decker Road, meaning that any signs are actually enforceable with the relevant authorities. As proposed, the applicant would merely be required to make a request at some point for permission to install signage stating that the roadway is weight restricted.

### **C. There is Feasible Air Quality Mitigation that Has Not Been Adopted.**

We have previously proposed a number of feasible air quality mitigation measures aimed at reducing significant diesel (NOx) emissions due to the Project. We submit that these measures have not been demonstrated to be infeasible based on substantial evidence in the record, through the Final EIR or the County's responses to our Planning Commission comment letter. In particular, with respect to 2010 trucks, the Final EIR mitigation measure stating that the applicant shall comply with CARB regulations is not tantamount to a requirement that owners/operators commit to trucks equipped with 2010 model year engines at the Project site. The CARB regulation requires the phase-in of 2010 model year trucks by 2023<sup>3</sup>. "Starting January 1, 2015, the regulation requires accelerated replacements of both lighter and heavier vehicles that do not have PM filters installed. From 2020 to 2023 nearly all older vehicles would need to be upgraded to have exhaust emissions meeting 2010 model year engine emissions levels."<sup>4</sup> We submit that a *faster* schedule (requiring only 2010 model year engines *presently*) is a feasible mitigation measure which lessens NOx impacts. This measure has been adopted by other similar projects as we have shown. To the extent that the County is proposing alternative mitigation language (*see* RTC ASE-4), we did not see this new language in any documents before the Board.

According to CARB, "[a]ll told, trucks and buses account for about 32 percent of the statewide emissions of NOx and about 40 percent of diesel PM emissions from all mobile sources. In California, the number of PM-related cardiopulmonary premature deaths from all sources is 9,200 per year with an uncertainty range of 7,300 to 11,000. Reducing emissions from in-use trucks and buses is necessary to meet federally imposed clean air standards and to reduce the adverse health effects from truck and bus pollution." *Id.* Therefore, all feasible air quality mitigation aimed at diesel emissions should be imposed for this Project.

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<sup>3</sup> <https://www.arb.ca.gov/msprog/onrdiesel/documents/FSRegSum.pdf>

<sup>4</sup> <https://www.arb.ca.gov/msprog/onrdiesel/documents/fsoverview.pdf>

We again appreciate the opportunity to offer comments and urge you to consider a continuation of this item for the reasons stated.

Sincerely,

A handwritten signature in black ink that reads "Abigail Smith". The script is cursive and fluid, with the first letter of each word being capitalized and prominent.

Abigail Smith  
Law Offices of Abigail Smith

Enclosure: Exhibits A-C

**EXHIBIT A**

**EXHIBIT A**



**REVISED** AGENDA  
TUESDAY, MAY 1, 2018  
BOARD OF SUPERVISORS  
COUNTY OF RIVERSIDE  
COUNTY ADMINISTRATIVE CENTER  
1<sup>st</sup> Floor Board Chambers  
4080 Lemon Street, Riverside, CA  
(Clerk 951-955-1060)  
[cob@rivco.org](mailto:cob@rivco.org)



Kevin Jeffries 1 <sup>st</sup> . District Vice-Chairman	John F. Tavaglione 2 <sup>nd</sup> . District	Chuck Washington 3 <sup>rd</sup> . District Chairman	V. Manuel Perez 4 <sup>th</sup> . District	Marion Ashley 5 <sup>th</sup> . District
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The County of Riverside is committed to making its public meetings accessible to persons with disabilities. In compliance with the Americans with Disabilities Act (ADA), all County public meetings are conducted in accessible locations. In addition, the County will provide auxiliary aids or services (such as American Sign Language interpreters, assistive listening devices and materials in alternate formats) upon request and at no cost, so that persons with disabilities may participate in the meetings. To request these services, please contact the Clerk of the Board office at least 72 hours prior to the meeting at or (951) 486-4470 from 8:00 a.m. to 5:00 p.m. Monday through Friday. Later requests will be accommodated to the extent feasible.

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9:00 AM

CALL TO ORDER

ROLL CALL

INVOCATION BY KAREN BARTON, BOARD ASSISTANT, CLERK OF THE BOARD OFFICE

PLEDGE OF ALLEGIANCE

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**OPENING COMMENTS**

BOARD MEMBERS

MEMORIALS / ADJOURNMENTS

EXECUTIVE OFFICER

STATE BUDGET UPDATE

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**CLERK OF THE BOARD UPDATE**

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**1 ADMINISTRATIVE ACTION**

REVISED 04/27/2018

TUESDAY, MAY 1, 2018 - PAGE 1

- 1.1 6715 CLERK OF THE BOARD: Proof of Publication. [\$0]
- 1.2 6839 TRANSPORTATION & LAND MANAGEMENT AGENCY/PLANNING: RECEIVE AND FILE THE PLANNING COMMISSION'S DECISION TO APPROVE THE FOURTH EXTENSION OF TIME for TENTATIVE TRACT MAP NO. 30908 – Applicant: ERP Holding Co., Inc., c/o Cydney White – **Second Supervisorial District** – University Zoning District - Highgrove Area Plan: Community Development: Medium Density Residential (CD: MDR) – Location: South of Spring Street, west of Mt. Vernon Avenue, and north of Palmyrita Avenue – 105.15 acres – Zoning: Specific Plan (S-P) Number #330, Planning Area: 1– APPROVED PROJECT DESCRIPTION: Subdivision of 105.15 acres into 437 residential lots, with a minimum lot size of 5,000 sq. ft., 11 open space lots, and 2 park sites. [Applicant Fees 100%.]
- 1.3 6843 TRANSPORTATION & LAND MANAGEMENT AGENCY/PLANNING: RECEIVE AND FILE THE PLANNING COMMISSION'S DECISION TO APPROVE THE FOURTH EXTENSION OF TIME for TENTATIVE TRACT MAP NO. 30909 – Applicant: ERP Holding Co., Inc., c/o Cydney White – **Second Supervisorial District** – University Zoning District - Highgrove Area Plan: Community Development: Medium Density Residential (CD:MDR) – Location: North of Pigeon Pass Road, south of E. Center Street, east of Mt. Vernon Avenue, and west of Riverside Avenue – 78.8 Acres – Zoning: Specific Plan (Plan Number 330, Planning Area 3) – APPROVED PROJECT DESCRIPTION: Subdivision of 78.8 gross acres into 213 residential lots, with a 4,000 sq. ft. minimum lot size, 10 open space lots, one 33.45 acre park, and one 1.38 acre reservoir. [Applicant Fees 100%.]
- 1.4 6835 TRANSPORTATION & LAND MANAGEMENT AGENCY/PLANNING: RECEIVE AND FILE THE PLANNING COMMISSION'S DECISION TO APPROVE THE SECOND EXTENSION OF TIME for TENTATIVE PARCEL MAP NO. 36108 – Applicant: Alexander Tynberg – **Fourth Supervisorial District** – Thousand Palms Zoning District - Western Coachella Valley Area Plan: Community Development: Light Industrial (CD: LI) – Location: North of Watt Court, East of Rio Del Sol Road – 20.0 Acres – Zoning: Manufacturing - Service Commercial (M-SC) – APPROVED PROJECT DESCRIPTION: Schedule E subdivision to divide approximately 20 gross acres into 20 industrial parcels with a common retention basin parcel and private common streets. Offsite secondary access, and a design manual to guide future development are also part of the project. [Applicant Fees 100%]

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## 2 CONSENT CALENDAR

- 2.1 6896 SUPERVISOR CHUCK WASHINGTON: Appointment of Gary Youmans to the Airport Land Use Commission, Third District. [\$0]
- 2.2 6430 ECONOMIC DEVELOPMENT AGENCY (EDA)/ WORKFORCE DEVELOPMENT DEPARTMENT AND SUPERVISOR WASHINGTON: Riverside County Workforce Development Board Reappointment of Darlene Wetton; Third District; [\$0]
- 2.3 6363 CLERK OF THE BOARD: Approval of the May 2018 Commemorative List of Presentations. [\$0]
- 2.4 6878 COUNTY COUNSEL: Approve the Riverside County Citrus Pest Control District No. 3 Conflict of Interest Code [District 3] [\$0]



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### 3 POLICY CALENDAR

- 3.1 6927 BOS DISTRICT 2: Second District Use of Community Improvement Designation (CID) Funds for the Jurupa Valley Boxing Club, Janet Goeske Foundation, Reaching New Heights Foundation and the Unforgettables Foundation. [\$13,000.00 - General Fund 100%] **(4/5 vote required)**
- 3.2 6949 SUPERVISOR JOHN TAVAGLIONE AND SUPERVISOR MARION ASHLEY: Support of the Emergency Ambulance Employee Safety and Preparedness Act. [\$0]
- 3.3 6930 BOS DISTRICT 5: Fifth District Use of Community Improvement Designation (CID) for Beaumont Educational Support Team, Perris Valley Chamber of Commerce, Riverside Art Museum and Saint James Community Food Pantry. [\$18,000 General Fund 100%] **(4/5 vote required)**
- 3.4 6734 EXECUTIVE OFFICE: Criminal Justice Administration Fee Charge to Arresting Agencies, All Districts [\$0]
- 3.5 6736 EXECUTIVE OFFICE: Criminal Justice Administration Fee Charge to Convicted Individuals, All Districts [\$0]
- 3.6 5554 ECONOMIC DEVELOPMENT AGENCY (EDA): Asset Removal of the Wesley Properties located at 270 Wesley Street and 530 E. Wesley Street in the City of Banning, District 5, [\$99,588 – General Fund-Sub Fund 11183 – 100%]
- 3.7 6461 ECONOMIC DEVELOPMENT AGENCY (EDA): Exercise of Option to Extend with Grinnell Properties, LLC - Transportation Land Management Agency, Palm Desert, Lease Extension, CEQA Exempt, District 4 [\$848,568] TLMA Deposit Based Fees 80%; General Fund 20% (Clerk to File Notice of Exemption)
- 3.8 6894 ECONOMIC DEVELOPMENT AGENCY (EDA): Approval of Subordination, Non-Disturbance, and Attornment Agreement with CP Perris MH, LLC, a California limited liability company (Lessor), and Wells Fargo Bank Northwest, N.A. (Lender), Riverside University Health System - Behavioral Health, Perris, CEQA Exempt, District 5.
- 3.9 6509 ECONOMIC DEVELOPMENT AGENCY (EDA): Approval of Memorandum of Understanding – Three Years, with the City of Lake Elsinore for Library Development Impact Fees Fund, District 1, [\$144,000], City of Lake Elsinore 83%, County Library Fund 17%
- 3.10 6064 ECONOMIC DEVELOPMENT AGENCY (EDA) AND RIVERSIDE COUNTY FIRE DEPARTMENT: Riverside County Fire Department Station # 77 - Lake Riverside Expansion Project - Adoption of a Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program, Approval of Plans, and Specifications, and Release of Bid Packages, District 3. [\$30,000 – Development Impact Fees – Western Riverside County Fire Facilities Fund 30505 – 100%] (Clerk to File Notice of Determination) **(Clerk to Advertise)**
- 3.11 6512 EMERGENCY MANAGEMENT DEPARTMENT: Approve the Service Agreement with Ceres Environmental Services, Inc., dba Environmental and Demolition Services Group, for Disaster-Related Debris Management Services through June 30, 2023. [Districts All]; [\$0]

- 3.12 6857 ENVIRONMENTAL HEALTH: In-Principle Approval for Lease of New Space for the Riverside County Department of Environmental Health in Southwest Riverside County. District 3. [\$0].
- 3.13 6863 FIRE DEPARTMENT: Approval of the Cooperative Agreement to Provide Fire Protection, Fire Prevention, Rescue and Medical Emergency Services between the County of Riverside and the City of Jurupa Valley for three (3) years. District 2; [\$29,595,299] General Fund 73.44% Structural Fire Tax 26.56%
- 3.14 6862 FIRE DEPARTMENT: Approval of the Cooperative Agreement to Provide Fire Department Dispatch and Communication Services for the Morongo Band of Mission Indians for three (3) years; District 5; [\$104,454 Revenue for three (3) years]
- 3.15 6864 FIRE DEPARTMENT: Approval of the Cooperative Agreement to Provide Fire Protection, Fire Prevention, Rescue and Medical Emergency Services for the City of Norco for three (3) year; District 2; [\$14,093,190 Revenue for three (3) years]
- 3.16 6802 FIRE DEPARTMENT: Approval of the Automatic Aid Agreement Between the County of Riverside and the Morongo Band of Mission Indians until terminated by either Party; District 3 [\$0]
- 3.17 6745 DEPARTMENT OF PUBLIC SOCIAL SERVICES: Approve Amendment #6 to Memorandum of Understanding #CW-03145 with the Housing Authority of the County of Riverside to provide Rapid Re-Housing Services to CalWORKs Customers, on behalf of DPSS. [All Districts]; [Total Cost for FY 17/18 \$1,435,000, FY 18/19 \$1,175,000 - 43% State Funding, 57% Federal Funding] **(4/5 vote required)**
- 3.18 6859 DELETED
- 3.19 6681 RIVERSIDE UNIVERSITY HEALTH SYSTEM - BEHAVIORAL HEALTH: Approval of the Blanket Purchase Order Agreement Aggregate for Licensed Board and Care Facilities. Districts: All; [\$500,000 Annually up to \$50,000 in additional compensation] [\$2,500,000 Total for 5 Years] 100% State funded
- 3.20 6725 RIVERSIDE UNIVERSITY HEALTH SYSTEM - BEHAVIORAL HEALTH: In-Principal Approval for Lease of Office Space for the Desert Adult Full Service Partnership Clinic. District: 4 [\$0]
- 3.21 5929 SHERIFF-CORONER-PA: Approval of the Agreement for Law Enforcement Services Between the City of Moreno Valley and the County of Riverside (FY17/18 – FY21/22), and Amend Salary Ordinance No. 440 pursuant to Resolution No. 440-9075 submitted herewith; District Five. [\$223,037,431 - Contract City Law Enforcement 100%]. **(4/5 vote required)** (3.48 of 02/27/2018)
- 3.22 6162 SHERIFF-CORONER-PA: Approval of the First Amendment to the Agreement for Law Enforcement Services Between the City of Rancho Mirage and the County of Riverside, and Amend Salary Ordinance No. 440 pursuant to Resolution No. 440-9076 submitted herewith; District Four. [\$2,407,454 - Contract City Law Enforcement 100%]. **(4/5 vote required)** (3.47 of 02/27/2018)

- 3.23 6665 TRANSPORTATION AND LAND MANAGEMENT AGENCY/TRANSPORTATION DEPARTMENT: Approval of Annual Additions To, and Exclusions From, the County of Riverside Maintained Road System. All Districts; [\$0].
- 3.24 6666 TRANSPORTATION AND LAND MANAGEMENT AGENCY/TRANSPORTATION: Approval of Amendment No 2 to the Agreement between the County of Riverside and Dokken Engineering for Engineering Services on the Interstate 15/Limonite Avenue Interchange Project. 2nd District; [\$300,000 Current FY; \$3,555,241 Total]; Local Funds 100%
- 3.25 6744 TRANSPORTATION AND LAND MANAGEMENT AGENCY: TRANSPORTATION DEPARTMENT: Approve Addenda to the Plans and Specifications, Accept the Low Bid and Award the Contract for the Thousand Palms Canyon Road Widening, Turning Lane and Resurfacing Project in the Thousand Palms area. 4th District; [\$455,000 Current FY; \$605,506 Total Cost]; Federal Funds 82%, Local Funds 18%.
- 3.26 6804 TREASURER-TAX COLLECTOR: Publication Agreements for the 2018 Notice of Power and Intent to Sell Tax-Defaulted Property, District All. [\$32,000-Treasurer-Tax Collector's Budget 100%]

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**4 SUCCESSOR AGENCY TO THE REDEVELOPMENT AGENCY MEETING**

(NO BUSINESS)

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**5 PUBLIC FINANCING AUTHORITY MEETING**

(NO BUSINESS)

**5 RIVERSIDE DISTRICT COURT FINANCING CORPORATION MEETING**

(NO BUSINESS)

**5 RIVERSIDE COUNTY INFRASTRUCTURE FINANCING AUTHORITY MEETING**

(NO BUSINESS)

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**6 INDUSTRIAL DEVELOPMENT AUTHORITY MEETING**

(NO BUSINESS)

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**7 IN-HOME SUPPORTIVE SERVICES PUBLIC AUTHORITY MEETING**

(NO BUSINESS)

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**8 COMMUNITY FACILITIES DISTRICT LEGISLATIVE BODY MEETING**

(NO BUSINESS)

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**9 PUBLIC HEARINGS**

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**10 HOUSING AUTHORITY MEETING**

- 10.1 5999 HOUSING AUTHORITY: Approve Exclusive Negotiation Agreement (With Predevelopment Loan) Between the Housing Authority of the County of Riverside and Abode Communities in Connection with the Villa Verde Affordable Rental Housing Project, located in the City of Coachella, District 4, [\$450,000 Former Coachella RDA 2006 Series A Housing Bonds]
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**11 FLOOD CONTROL AND WATER CONSERVATION DISTRICT MEETING**

- 11.1 5217 FLOOD CONTROL DISTRICT: Approve Plans and Specifications and Authorizing for Advertising Meadowview Stream Restoration, Stage 60, Project No. 7-0-00361-60; Nothing further is Required under CEQA; District 3. [\$0] **(Clerk to Advertise)**
- 11.2 6784 FLOOD CONTROL DISTRICT: Accept Notice of Completion for Monroe MDP – Monroe Channel, Stage 4, Project No. 1-0-00071-04, District 1. [\$0 - District Funds 100%]
- 

**12 COUNTY BOARD AND WASTE RESOURCES MANAGEMENT DISTRICT MEETING**

C. COUNTY

- 12.1 6685 DEPARTMENT OF WASTE RESOURCES: Introduction of Riverside County Ordinance No. 779.19 amending Ordinance No. 779 Relating to County Solid Waste Facilities and Establishing Fees; All Districts. [\$0] **(Clerk to Advertise - Set Public Hearing for 5/22/18)**

D. DISTRICT

(NO BUSINESS)

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**13 COUNTY BOARD AND REGIONAL PARK AND OPEN SPACE DISTRICT MEETING**

C. COUNTY

(NO BUSINESS)

D. DISTRICT

(NO BUSINESS)

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**14 RIVERSIDE COMMUNITY HOUSING CORP. MEETING**

(NO BUSINESS)

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**15 PUBLIC COMMENT**

In accordance with Board Policy A-2, section 14, the Chair requests that all present refrain from any action that might disrupt the orderly course of the meeting. Coarse, crude, profane, or vulgar language, or unsolicited comments from the audience, which disrupts or disturbs the Board meeting, may result in exclusion from the meeting. Board members are not allowed to take formal action on items not on the published agenda. As a result, immediate response to public comments may be limited.

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**16 RIVERSIDE COUNTY LIBRARY SYSTEM FOUNDATION MEETING**

(NO BUSINESS)

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**17 10:30 A.M. COUNTY GENERAL PLAN AMENDMENT INITIATION PROCEEDINGS MEETING**

(NO BUSINESS)

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**18 10:30 A.M. COUNTY LAND USE PUBLIC HEARINGS MEETING**

- 18.1 6810 TRANSPORTATION & LAND MANAGEMENT AGENCY/PLANNING: Public Hearing on GENERAL PLAN AMENDMENT NOS. 1151 AND 1152, CHANGE OF ZONE NOS. 7872 AND 7873, PLOT PLAN NOS. 25837 AND 25838, TENTATIVE PARCEL MAP NOS. 36950 AND 36962 – EIR00546 – Applicant: Trammel Crow, Inc. – Representative: David Evans and Associates, Inc. – **First Supervisorial District** – Mead Valley Zoning District – Mead Valley Area Plan – Community Development: Light Industrial (CD:LI), Community Development: Business Park (CD:BP) - Location: Southerly of Oleander Avenue, northerly of Nance Street, westerly of Harvill Avenue, and easterly of Day Street - Zoning: Rural Residential, ½ acre minimum (R-R-½), Medium Manufacturing (M-M), Industrial Park (I-P) - REQUEST: GENERAL PLAN AMENDMENT NOS. 1151 and 1152 propose to change the General Plan Land Use Designation from a mix of Community Development: Light Industrial (CD:LI) and Community Development: Business Park (CD:BP) to entirely Community Development: Light Industrial (CD:LI). CHANGE OF ZONE NOS. 7872 and 7873 propose to change the zoning classification from a mix of Rural Residential (R-R), Rural Residential, ½ acre minimum (R-R-½), Medium Manufacturing (M-M), and Industrial Park (I-P) to entirely Industrial Park (I-P). PLOT PLAN NO. 25838 proposes the construction and operation of a 702,645 square foot warehouse/distribution/manufacturing building on 37.08 acres. PLOT PLAN NO. 25837 proposes the construction and operation of a 410,982 square foot warehouse/distribution/manufacturing building on 21.52 acres. TENTATIVE PARCEL MAP NO. 36950 proposes a Schedule H subdivision of 37.08 gross acres to consolidate the existing four parcels into one parcel. TENTATIVE PARCEL MAP NO. 36962 proposes a Schedule E subdivision of 21.52 gross acres into two parcels, one (1) for the proposed development and one (1) to be left vacant at this time. APNs: 314-020-010, 314-020-017, 314-040-001, 314-040-002, 314-040-003, and 314-040-008. [Applicant fees 100%.]
- 18.2 6766 TRANSPORTATION & LAND MANAGEMENT AGENCY/PLANNING: Public Hearing on General Plan Amendment No. 1135, Specific Plan No. 386, Change of Zone No. 7850, Tentative Parcel Map No. 37191 (FAST TRACK NO. 2014-01) - Intent to adopt a Mitigated Negative Declaration - Applicant: Thousand Palms 278, LLC- Representative: The Altum Group – **Fourth Supervisorial District** – Thousand Palms Zoning Area-Western Coachella Valley Area Plan – Zoning: One Family Dwelling (R-1) and General Residential (R-3) – Location: Southerly of Ramon Road and easterly of Monterey Avenue - 119.11 acres - REQUEST: SPECIFIC PLAN NO. 386 proposes a maximum of 590 residential units on 117.99 gross acres with various lot configuration options for one and two-story single-family residences with four architectural styles. GENERAL PLAN AMENDMENT NO. 1135 proposes to change the project site's land use designations from Community Development: Medium Density Residential (MDR) to those as reflected in the Specific Plan land use plan. CHANGE OF ZONE NO. 7850 proposes to change the zoning classification of the subject site from a mix of General Residential (R-3-6000) and One-Family Dwellings (R-1), to Specific Plan (SP). TENTATIVE PARCEL MAP NO. 37191 proposes a Schedule "I" subdivision to create four (4) residential parcels. The parcels will be a minimum of 21 gross acres. APNs: 693-230-001; 693-160-002; and 693-180-001. [Applicant fees 100%.]
-

**CONCURRENT EXECUTIVE SESSION-COUNTY OF RIVERSIDE, SUCCESSOR AGENCY TO THE REDEVELOPMENT AGENCY, REGIONAL PARK AND OPEN SPACE DISTRICT, FLOOD CONTROL AND WATER CONSERVATION DISTRICT, WASTE RESOURCES MANAGEMENT DISTRICT, HOUSING AUTHORITY, RIVERSIDE COMMUNITY HOUSING CORP., IN-HOME SUPPORTIVE SERVICES PUBLIC AUTHORITY AND COMMUNITY FACILITIES DISTRICTS**

WITH RESPECT TO EVERY ITEM OF BUSINESS TO BE DISCUSSED IN CLOSED SESSION PURSUANT TO GOVERNMENT CODE SECTION 54956.9:

CONFERENCE WITH LEGAL COUNSEL-EXISTING LITIGATION:  
(SUBDIVISION (D)(1) OF GOVERNMENT CODE SECTION 54956.9)

6958 A.1      County of Riverside v. Joan Adger, et al., Case No. RIC 1805173

6961 A.2      County of Riverside v. Desert Jet Center, LLC, Case No. PSC 1703272;  
Desert Jet Center, LLC v. County of Riverside, USDC Case No. 5:17-cv-01965

CONFERENCE WITH LEGAL COUNSEL-ANTICIPATED LITIGATION: SIGNIFICANT EXPOSURE TO LITIGATION PURSUANT TO SUBDIVISION (D)(2) OF GOVERNMENT CODE SECTION 54956.9

6944 B.1      One potential case

CONFERENCE WITH LEGAL COUNSEL-ANTICIPATED LITIGATION: INITIATION OF LITIGATION PURSUANT TO SUBDIVISION (D)(4) OF GOVERNMENT CODE SECTION 54956.9

6945 C.1      One potential case

WITH RESPECT TO EVERY ITEM OF BUSINESS TO BE DISCUSSED IN CLOSED SESSION PURSUANT TO GOVERNMENT CODE SECTION 54957.6

6947 D.1      Conference with labor negotiator:  
Agency Negotiator – Michael Bowers  
Employee organizations – Management/Confidential, Unrepresented, RCDDAA, RSA, SEIU, LIUNA, UDW and LEMU

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**RECESS TO LUNCH**

# **EXHIBIT B**

# **EXHIBIT B**

**NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON GENERAL PLAN AMENDMENTS, CHANGES OF ZONE, TENTATIVE PARCEL MAPS AND PLOT PLANS IN THE MEAD VALLEY AREA, FIRST SUPERVISORIAL DISTRICT AND NOTICE OF INTENT TO CERTIFY AN ENVIRONMENTAL IMPACT REPORT**

NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1<sup>st</sup> Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on **Tuesday, May 1, 2018 at 10:30 A.M.** or as soon as possible thereafter, to consider the application submitted by Trammel Crow, Inc., on **General Plan Amendment Nos. 1151 and 1152**, which proposes to change the General Plan Land Use Designation from a mix of Community Development: Light Industrial (CD:LI) and Community Development: Business Park (CD:BP) to entirely Community Development: Light Industrial (CD:LI); **Change of Zone Nos. 7872 and 7873**, which proposes to change the zoning classification from a mix of Rural Residential (R-R), Rural Residential, ½ acre minimum (R-R-½), Medium Manufacturing (M-M) and Industrial Park (I-P) to entirely Industrial Park (I-P); **Plot Plan Nos. 25837 and 25838**, which proposes the construction and operation of a 702,645 square foot warehouse/distribution/manufacturing building on 37.08 acres and proposes the construction and operation of a 410,982 square foot warehouse/distribution/manufacturing building on 21.52-acres; and **Tentative Parcel Map Nos. 36950 and 36962**, which proposes a subdivision of 37.08 gross acres to consolidate the existing four parcels into one parcel and proposes a subdivision of 21.52 gross acres into two parcels, one for the proposed development and one to be left vacant at this time. The project is located southerly of Oleander Avenue, northerly of Nance Street, westerly of Harvill Avenue, and easterly of Day Street in the First Supervisorial District.

The Planning Commission recommended that the Board of Supervisors approve the project and Tentatively Certify **Environmental Impact Report No. 546**.

The project case file may be viewed from the date of this notice until the public hearing, Monday through Friday, from 8:00 a.m. to 5:00 p.m. at the Riverside County Planning Department at 4080 Lemon Street, 12th Floor, Riverside, California 92501.

FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT RUSSELL BRADY, PROJECT PLANNER, AT (951) 955-3025 OR EMAIL [Rbrady@rivco.org](mailto:Rbrady@rivco.org).

Any person wishing to testify in support of or in opposition to the project may do so in writing between the date of this notice and the public hearing, or may appear and be heard at the time and place noted above. All written comments received prior to the public hearing will be submitted to the Board of Supervisors and the Board of Supervisors will consider such comments, in addition to any oral testimony, before making a decision on the project.

If you challenge the above item in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence to the Planning Commission or Board of Supervisors at, or prior to, the public hearing. Be advised that as a result of the public hearing and the consideration of all public comment, written and oral, the Board of Supervisors may amend, in whole or in part, the project and/or the related environmental document. Accordingly, the designations, development standards, design or improvements, or any properties or lands within the boundaries of the project, may be changed in a way other than specifically proposed.

Alternative formats available upon request to individuals with disabilities. If you require reasonable accommodation, please contact Lisa Wagner at (951) 955-1063, at least 72 hours prior to hearing.

Please send all written correspondence to: Clerk of the Board, 4080 Lemon Street, 1st Floor, Post Office Box 1147, Riverside, CA 92502-1147

Dated: April 17, 2018

Kecia Harper-Ihem, Clerk of the Board  
By: Karen Barton, Board Assistant

**EXHIBIT “C”**

**EXHIBIT “C”**



**SUBMITTAL TO THE BOARD OF SUPERVISORS  
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA**



**ITEM**  
18.1  
(ID # 6810)

**MEETING DATE:**  
Tuesday, May 1, 2018

**FROM :** TLMA-PLANNING:

**SUBJECT:** TRANSPORTATION & LAND MANAGEMENT AGENCY/PLANNING: Public Hearing on GENERAL PLAN AMENDMENT NOS. 1151 AND 1152, CHANGE OF ZONE NOS. 7872 AND 7873, PLOT PLAN NOS. 25837 AND 25838, TENTATIVE PARCEL MAP NOS. 36950 AND 36962 – EIR00546 – Applicant: Trammel Crow, Inc. – Representative: David Evans and Associates, Inc. – First Supervisorial District – Mead Valley Zoning District – Mead Valley Area Plan – Community Development: Light Industrial (CD:LI), Community Development: Business Park (CD:BP) - Location: Southerly of Oleander Avenue, northerly of Nance Street, westerly of Harvill Avenue, and easterly of Day Street - Zoning: Rural Residential, ½ acre minimum (R-R-½), Medium Manufacturing (M-M), Industrial Park (I-P) - REQUEST: GENERAL PLAN AMENDMENT NOS. 1151 and 1152 propose to change the General Plan Land Use Designation from a mix of Community Development: Light Industrial (CD:LI) and Community Development: Business Park (CD:BP) to entirely Community Development: Light Industrial (CD:LI). CHANGE OF ZONE NOS. 7872 and 7873 propose to change the zoning classification from a mix of Rural Residential (R-R), Rural Residential, ½ acre minimum (R-R-½), Medium Manufacturing (M-M), and Industrial Park (I-P) to entirely Industrial Park (I-P). PLOT PLAN NO. 25838 proposes the construction and operation of a 702,645 square foot warehouse/distribution/manufacturing building on 37.08 acres. PLOT PLAN NO. 25837 proposes the construction and operation of a 410,982 square foot warehouse/distribution/manufacturing building on 21.52 acres. TENTATIVE PARCEL MAP NO. 36950 proposes a Schedule H subdivision of 37.08 gross acres to consolidate the existing four parcels into one parcel. TENTATIVE PARCEL MAP NO. 36962 proposes a Schedule E subdivision of 21.52 gross acres into two parcels, one (1) for the proposed development and one (1) to be left vacant at this time. APNs: 314-020-010, 314-020-017, 314-040-001, 314-040-002, 314-040-003, and 314-040-008. [Applicant fees 100%.]

**RECOMMENDED MOTION FROM THE PLANNING COMMISSION:** That the Board of Supervisors:

**TENTATIVELY CERTIFY Environmental Impact Report No. 546** based on the findings incorporated in the EIR, and subject to the resolution adoption by the Riverside County Board of Supervisors; and,

**TENTATIVELY APPROVE GENERAL PLAN AMENDMENT NO. 1151** that changes the land use designation for Parcels 314-040-002 and 314-040-008 from Community Development: Business Park (CD:BP) to Community Development: Light Industrial (CD:LI), in accordance with

**SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,  
STATE OF CALIFORNIA**

Exhibit 6, based on the findings and conclusions incorporated in the staff report, subject to adoption of the General Plan Cycle Resolution by the Board of Supervisors; and,

**TENTATIVELY APPROVE GENERAL PLAN AMENDMENT NO. 1152** that changes the land use designation for Parcels 314-020-017 and 314-020-010 from Community Development: Business Park (CD:BP) to Community Development: Light Industrial (CD:LI), in accordance with Exhibit 6, based on the findings and conclusions incorporated in the staff report, subject to adoption of the General Plan Cycle Resolution by the Board of Supervisors; and,

**TENTATIVELY APPROVE CHANGE OF ZONE NO. 7872** that changes the zoning classification of Parcel Nos. 314-040-002 and 314-040-008 from Rural Residential (R-R) to Industrial Park (I-P) and the portions of Parcel Nos. 314-040-001 and 314-040-003 that are zoned Medium Manufacturing (M-M) to Industrial Park (I-P) in accordance with Exhibit 3, subject to adoption of the zoning ordinance by the Board of Supervisors; and,

**TENTATIVELY APPROVE CHANGE OF ZONE NO. 7873** that changes the zoning classification of Parcel No. 314-020-010 from Rural Residential, ½ acre minimum (R-R-½) to Industrial Park (I-P) in accordance with Exhibit 3, subject to adoption of the zoning ordinance by the Board of Supervisors; and,

**APPROVE TENTATIVE PARCEL MAP NO. 36950**, based upon the findings and conclusions incorporated into the staff report, and subject to the attached conditions of approval and final approval of General Plan Amendment No. 1151 and Change of Zone No. 7872; and,

**APPROVE TENTATIVE PARCEL MAP NO. 36962**, based upon the findings and conclusions incorporated into the staff report, and subject to the attached conditions of approval and final approval of General Plan Amendment No. 1152 and Change of Zone No. 7873; and

**APPROVE PLOT PLAN NO. 25837**, based upon the findings and conclusions incorporated into the staff report, and subject to the attached conditions of approval and final approval of General Plan Amendment No. 1151 and Change of Zone No. 7872; and

**APPROVE PLOT PLAN NO. 25838**, based upon the findings and conclusions incorporated into the staff report, and subject to the attached conditions of approval and final approval of General Plan Amendment No. 1152 and Change of Zone No. 7873.

**RECOMMENDED MOTION FROM STAFF:** That the Board of Supervisors:

**TENTATIVELY CERTIFY Environmental Impact Report No. 546** based on the findings incorporated in the EIR, and subject to resolution adoption by the Riverside County Board of Supervisors; and,

**SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,  
STATE OF CALIFORNIA**

**TENTATIVELY APPROVE GENERAL PLAN AMENDMENT NO. 1151** that changes the land use designation for Parcels 314-040-002 and 314-040-008 from Community Development: Business Park (CD:BP) to Community Development: Light Industrial (CD:LI), in accordance with Exhibit 6, based on the findings and conclusions incorporated in the staff report, subject to adoption of the General Plan Cycle Resolution by the Board of Supervisors; and,

**TENTATIVELY APPROVE GENERAL PLAN AMENDMENT NO. 1152** that changes the land use designation for Parcels 314-020-017 and 314-020-010 from Community Development: Business Park (CD:BP); to Community Development: Light Industrial (CD:LI), in accordance with Exhibit 6, based on the findings and conclusions incorporated in the staff report, subject to adoption of the General Plan Cycle Resolution by the Board of Supervisors; and,

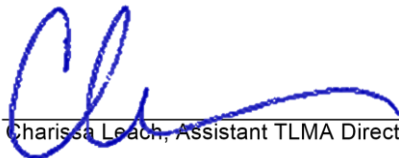
**TENTATIVELY APPROVE CHANGE OF ZONE NO. 7872** that changes the zoning classification of Parcel Nos. 314-040-002 and 314-040-008 from Rural Residential (R-R) to Industrial Park (I-P) and the portions of Parcel Nos. 314-040-001 and 314-040-003 that are zoned Medium Manufacturing (M-M) to Industrial Park (I-P) in accordance with Exhibit 3, subject to adoption of the zoning ordinance by the Board of Supervisors; and,

**TENTATIVELY APPROVE CHANGE OF ZONE NO. 7873** that changes the zoning classification of Parcel No. 314-020-010 from Rural Residential, ½ acre minimum (R-R-½) to Industrial Park (I-P) in accordance with Exhibit 3, subject to adoption of the zoning ordinance by the Board of Supervisors; and,

**APPROVE PLOT PLAN NO. 25837**, based upon the findings and conclusions incorporated into the staff report, and subject to the attached conditions of approval and final approval of General Plan Amendment No. 1151 and Change of Zone No. 7872; and

**APPROVE PLOT PLAN NO. 25838**, based upon the findings and conclusions incorporated into the staff report, and subject to the attached conditions of approval and final approval of General Plan Amendment No. 1152 and Change of Zone No. 7873.

**ACTION:**



Charissa Leach, Assistant TLMA Director

4/23/2018

---

**MINUTES OF THE BOARD OF SUPERVISORS**

**SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,  
STATE OF CALIFORNIA**

<b>FINANCIAL DATA</b>	<b>Current Fiscal Year:</b>	<b>Next Fiscal Year:</b>	<b>Total Cost:</b>	<b>Ongoing Cost</b>
<b>COST</b>	\$ N/A	\$ N/A	\$ N/A	\$ N/A
<b>NET COUNTY COST</b>	\$ N/A	\$ N/A	\$ N/A	\$ N/A
<b>SOURCE OF FUNDS: Applicant Fees 100%</b>			<b>Budget Adjustment:</b>	No
			<b>For Fiscal Year:</b>	N/A

**C.E.O. RECOMMENDATION:** Approve

**BACKGROUND:**

**Summary**

The overall project site is located southerly of Oleander Avenue, northerly of Nance Street, westerly of Harvill Avenue, and easterly of Day Street. The overall project site is split into two sites by Ellsworth Street that will hereinafter be referred to as the Building D and Building E sites, respectively. The Building D site is located east of Ellsworth Street and the Building E site is located west of Ellsworth Street. The applications being considered for each site are:

**Building D**

**GENERAL PLAN AMENDMENT NO. 1151** proposes to change the General Plan land use designation for Parcels 314-040-002 and 314-040-008 from Community Development: Business Park (CD:BP) to Community Development: Light Industrial (CD:LI). The entire Building D site will then have a land use designation of Community Development: Light Industrial (CD:LI).

**CHANGE OF ZONE NO. 7872** proposes to change the zoning classification for Parcels 314-040-002 and 314-040-008 from Rural Residential (R-R) to Industrial Park (I-P), and the portions of Parcels 314-040-001 and 314-040-003 that are zoned Medium Manufacturing (M-M) to Industrial Park (I-P). The entire Building D site will then have a zoning classification of Industrial Park (I-P).

**TENTATIVE PARCEL MAP NO. 36950** proposes a Schedule H subdivision of 37.08 gross acres to consolidate the existing four parcels into one parcel and provide for public right-of-way dedication on Oleander Avenue and Ellsworth Street. Although defined as a Schedule H subdivision, in accordance with Section 3.1.B. of Ordinance No. 460, the subdivision is being required to provide Schedule E improvements that are more consistent with the industrial nature of the development. The Schedule E improvements are greater than those of a Schedule H subdivision.

**PLOT PLAN NO. 25838** proposes the construction and operation of a 702,645 square foot warehouse/distribution/manufacturing building on 37.08-acres (gross) consisting of 15,000 square feet of office space, 10,000 square feet of mezzanine, and 677,645 square feet of warehouse with 109 truck loading bays, 251 trailer parking stalls, 439 automobile parking stalls,

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STATE OF CALIFORNIA**

and all other necessary and required improvements on the project site and along the adjacent streets.

**Building E**

**GENERAL PLAN AMENDMENT NO. 1152** proposes to change the General Plan land use designation for Parcels 314-020-017 and 314-020-010 from Community Development: Business Park (CD:BP) to Community Development: Light Industrial (CD:LI). The entire Building E site will then have a land use designation of Community Development: Light Industrial (CD:LI).

**CHANGE OF ZONE NO. 7873** proposes to change the zoning classification for Parcel 314-020-010 from Rural Residential, ½ acre minimum (R-R-½) to Industrial Park (I-P). The entire Building E site will then have a zoning classification of Industrial Park (I-P).

**TENTATIVE PARCEL MAP NO. 36962** proposes a Schedule E subdivision of 21.52 gross acres into two parcels, one for the proposed development and one to be left vacant at this time, and provide for public right-of-way dedication on Oleander Avenue and Ellsworth Street.

**PLOT PLAN NO. 25837** proposes the construction and operation of a 410,982 square foot warehouse/distribution/manufacturing building on 21.52 acres (gross) consisting of 15,000 square feet of office space and 395,982 square feet of warehouse, with 51 truck loading bays, 80 truck trailer parking stalls, and 260 automobile parking stalls, and all other necessary and required improvements on the project site and along the adjacent streets.

**Environmental Impact Report**

An Environmental Impact Report (EIR) has been prepared for this project in accordance with the California Environmental Quality Act (CEQA). The EIR represents the independent judgement of Riverside County. The Draft EIR was circulated in May of 2017. Below is a summary of the significant and unavoidable impacts identified in the circulated Draft EIR:

Air Quality - AQMP Consistency

The Project would have the potential to result in or cause National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS) violations due to the project's exceedance of regional operational emission thresholds for VOC and NOx. Therefore, the Project would have a significant and unavoidable cumulative effect on regional air pollution. All feasible mitigation has been adopted. However, impacts related to AQMP consistency would remain significant and unavoidable.

Air Quality – Operation Emissions-Regional

Although construction emissions are able to be mitigated to a level that does not exceed emission thresholds, operational emissions (primarily from mobile/vehicle emissions) for NOx and VOC are not able to be mitigated to a level below emission thresholds as no



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feasible mitigation exists to reduce mobile emissions. Therefore, impacts related to operational emissions of VOC and NOx would remain significant and unavoidable.

Land Use and Planning

Although the change in land use designation from Business Park to Light Industrial does not represent a significant shift in planned land use of the subject site, the project site is mostly vacant and undeveloped under existing conditions and surrounded by vacant and rural residential type uses. Therefore, the proposed development of an industrial building and uses on the site would result in a substantial change to the site's use and a significant impact. Mitigation measures are proposed on the various impact topics (i.e. air quality, noise, traffic, etc.) to mitigate the impacts from the change from vacant to the proposed land use, but impacts to this change in land use remain potentially significant.

Noise – Operational

Project-related operational impacts would result in less than significant impact to noise-sensitive receptors associated with on-site operational activities with the installation of an 8 foot high noise attenuation barrier along the project's southern boundary. However, the project's generation of vehicle traffic and noise off-site along Oleander Avenue adjacent to and east of the project site would result in a significant direct and cumulative impact. No feasible mitigation exists to reduce these off-site impacts and impacts remain significant.

Transportation and Traffic - Conflict with Plan, Ordinance or Policy Establishing Standards for Circulation System and Conflict with an Applicable Congestion Management Plan

The Project would generate traffic that would exceed the significance thresholds for certain intersections and roadway segments. Mitigation measures for certain road improvements are included that address the direct impacts of the project. However, significant cumulative impacts remain for intersections where fair share fees are paid for the project's incremental impacts where improvements are not guaranteed to be completed prior to the project's operation. Additionally, the project would add traffic to freeway facilities that would impact already deficient facilities. These facilities are under the jurisdiction of Caltrans and Riverside County cannot assure the construction of improvements to state highway facilities that may be needed to address deficiencies. Mitigation is included for the project to pay its fair share of impacts on state highway facilities if such a program is established by Caltrans. Since this is not certain, impacts remain significant.

Nineteen comments were received during the 45-day public review period and one comment was received following the close of the public review period. These comments were reviewed and detailed responses to each comment were prepared and included in the Final EIR, which was posted on March 6, 2018, and with mailed notices to commenters sent on March 6, 2018.

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STATE OF CALIFORNIA**

For the reasons set forth above and in the EIR prepared for this Project, the proposed project will potentially have a significant effect on the environment related Air Quality, Land Use and Planning, Noise, and Transportation. Mitigation Measures from the Environmental Impact Report have been incorporated as conditions of approval on the project.

**Planning Commission Written Comments**

Prior to the Planning Commission hearing, written comments were received from Debbie Walsh, Abigail Smith, and Blum Collins. Most comments included within the letters were previously submitted as comments on the Draft EIR and were addressed and responded to in the Response to Comments section included in the Final EIR. Some new comments were included in the recent letters and responses to these were specifically prepared and are included as a separate attachment to this Form 11.

The Planning Commission considered the project during a regularly scheduled public hearing on April 4, 2018. After hearing public testimony, the Planning Commission recommended approval of the project by a vote of 5-0.

**Tentative Parcel Maps**

On April 11, 2018, the applicant submitted a request to the Planning Department requesting to withdraw the application for Tentative Parcel Map Nos. 36950 and 36962 (See Attachment K). Based on discussions with the applicant on alternative methods to consolidate parcels and shift lot lines via a Parcel Merger and Lot Line Adjustment, staff is recommending modifying the Project to exclude Tentative Parcel Map Nos. 36950 and 36962. Exclusion of the Tentative Parcel Maps does not constitute a substantial modification to the project because the project's use, intensity, and impacts to the surrounding properties will remain the same. Requirements for street dedication and improvements are already conditioned on the respective Plot Plans.

**Condition Revisions**

Following the April 4<sup>th</sup> Planning Commission Hearing, the applicant identified that conditions 60.Planning.1-5 on the Plot Plans are redundant to conditions 60.Planning-CUL.1-5. The 60.Planning-CUL.1-5 are proposed to be retained and conditions 60.Planning.1-5 are recommended to be deleted.

As part of the responses to the public comments received, a condition is recommended to be included as shown below to provide further measures to limit truck traffic on Ellsworth Street.

The project proponent shall file a request with the Riverside County Transportation Department to install weight limit signs to restrict trucks with gross vehicle weight rating over 14,000-lb from traveling on Decker Road (Ellsworth Street) south of Oleander Avenue or as approved by the Director of Transportation.

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STATE OF CALIFORNIA**

To clarify the project's ability to accommodate a refrigerated warehouse use in relation to the EIR that does not include this in its analysis, the following is recommended to be added to the end of the project description condition for each Plot Plan (Advisory Notification.6)

Refrigerated warehouse space is not permitted.

As part of the responses to public comments received, condition AND 15.Planning.14 on PP25837 and AND 15.Planning.16 on PP25838 is recommended to be revised as follows with the underlined text added:

Developer and all successors shall stipulate in building lease and sale agreements that yard trucks and forklifts shall not be fueled with diesel.

To allow flexibility if and when a funding mechanism is created to offset traffic impacts to freeways, condition 80.Transportation.16 on both Plot Plans is recommended to be updated as follows with the underlined text added:

In the event that Caltrans or other appropriate government agency establishes a fair-share funding program for cumulatively considerable impacts to freeway system segments caused by private development projects that would be applicable to the Project site, prior to the issuance of a building permit for the Project, the Project Applicant shall provide evidence to Riverside County that such fair-share fee has been paid. If Caltrans or other appropriate government agency has not established such a fee prior to building permit issuance, the Project Applicant shall have no further obligation associated with this mitigation measure.

**Impact on Residents and Businesses**

All potential project impacts have been studied under CEQA and noticed to the public pursuant to the requirements of the County and State law.

**SUPPLEMENTAL:**

**Additional Fiscal Information**

All fees are paid by the applicant. There is no General Fund obligation.

**ATTACHMENTS:**

- A. Response to Public Comments
- B. Letter from Applicant
- C. Planning Commission Minutes
- D. Planning Commission Memos
- E. Planning Commission Staff Report
- F. Final EIR No. 546
- G. Plot Plan No. 25838 Exhibits
- H. Plot Plan No. 25837 Exhibits

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STATE OF CALIFORNIA**

- I.** Tentative Parcel Map No. 36950 Exhibits
- J.** Tentative Parcel Map No. 36962 Exhibits
- K.** Indemnification Agreements

**From:** Maxwell, Sue  
**Sent:** Tuesday, May 1, 2018 7:57 AM  
**To:** COB-Agenda (COB-Agenda@rivco.org); George Johnson (GAJohnson@RIVCO.ORG); Leach, Charissa (cleach@RIVCO.ORG); Perez, Juan (JCPEREZ@RIVCO.ORG); Young, Alisa; District 4 Supervisor V. Manuel Perez (District4@RIVCO.ORG); District2; District3; District5; Supervisor Jeffries - 1st District (district1@rivco.org)  
**Cc:** Russell Brady (rbrady@RIVCO.ORG)  
**Subject:** May 1 2018 Item 18.1 - Public Comment to Continue GPAs 1151 and 1152 (Abigail Smith)  
**Attachments:** 2018.04.30 Knox BP\_BOS Comments w Exhibits A-C.PDF

Good morning,

Attached is a 28-page Public Comment email received via COB from Ms. Abby Smith, requesting continuance of the May 1, 2018 Item 18.1 (MinuteTraQ No 6810) relating to the Mead Valley Community Development Project.

The attachment will be saved and added as Back-up to the Agenda Item.

Thank you kindly,

*Sue Maxwell*  
Board Assistant  
Clerk of the Board of Supervisors  
4080 Lemon Street, 1<sup>st</sup> Floor, Room 127  
Riverside, CA 92501  
(951) 955-1069 Fax (951) 955-1071  
Mail Stop #1010  
[smaxwell@rivco.org](mailto:smaxwell@rivco.org)  
<http://rivcocob.org/>  
<https://www.facebook.com/RivCoCOB/>



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**From:** Maxwell, Sue  
**Sent:** Tuesday, May 1, 2018 7:46 AM  
**To:** 'Abigail A. Smith' <abby@socalceqa.com>; Brady, Russell <rbrady@RIVCO.ORG>  
**Subject:** BOS Hearing May 1, Item 18.1 (Abigail Smith)

Good morning Ms. Smith,

The Clerk of the Board of Supervisors is in receipt of your letter sent via email regarding Item 18.1, and has included it in the record for May 1, 2018.

Sincerely,

*Sue Maxwell*  
Board Assistant  
Clerk of the Board of Supervisors  
4080 Lemon Street, 1<sup>st</sup> Floor, Room 127  
Riverside, CA 92501  
(951) 955-1069 Fax (951) 955-1071  
Mail Stop #1010  
[smaxwell@rivco.org](mailto:smaxwell@rivco.org)  
<http://rivcocob.org/>  
<https://www.facebook.com/RivCoCOB/>





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**From:** Abigail A. Smith [mailto:abby@socalceqa.com]  
**Sent:** Monday, April 30, 2018 5:02 PM  
**To:** Brady, Russell <rbrady@RIVCO.ORG>; COB <COB@RIVCO.ORG>  
**Subject:** BOS Hearing May 1, Item 18.1

To the Riverside County Board of Supervisors:

Attached, please find a letter regarding **Item 18.1** on the Board Agenda for the **May 1, 2018** Board hearing, re: the Knox Business Park Buildings D and E project.

Thank you for including this letter with your record of the Project.

Abby Smith

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**From:** Maxwell, Sue  
**Sent:** Tuesday, May 1, 2018 8:19 AM  
**To:** Brady, Russell; COB-Agenda (COB-Agenda@rivco.org); George Johnson (GAJohnson@RIVCO.ORG); Leach, Charissa (cleach@RIVCO.ORG); Perez, Juan (JCPEREZ@RIVCO.ORG); Young, Alisa; District 4 Supervisor V. Manuel Perez (District4@RIVCO.ORG); District2; District3; District5; Supervisor Jeffries - 1st District (district1@rivco.org)  
**Subject:** May 1 2018 Item 18.1 - Public Comment Opposing GPAs 1151 and 1152 (Dr. John Minnella-Romano)

Good morning,

Although some of you were on Dr. Minnella-Romano's initial email below, this is being forwarded as acknowledgement of receipt of his Public Comment opposing GPAs 1151 and 1152 for the Mead Valley Community Development (Warehouse) Project, on today's May 1, 2018 Board Meeting under Item 18.1.

This will be saved and added as Back-up to the Agenda Item.

Thank you kindly,

*Sue Maxwell*  
Board Assistant  
Clerk of the Board of Supervisors  
4080 Lemon Street, 1st Floor, Room 127  
Riverside, CA 92501  
(951) 955-1069 Fax (951) 955-1071  
Mail Stop #1010  
[smaxwell@rivco.org](mailto:smaxwell@rivco.org)  
<http://rivcocob.org/>  
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**From:** Maxwell, Sue  
**Sent:** Tuesday, May 1, 2018 8:11 AM  
**To:** 'Dr. John L. MINNELLA-Romano' <drjminnella@yahoo.com>; Supervisor Jeffries - 1st District <district1@RIVCO.ORG>; District3 <District3@Rivco.org>; District5 <District5@Rivco.org>; District2 <District2@Rivco.org>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; Hildebrand, John <JHildebr@RIVCO.ORG>; Brady, Russell <rbrady@RIVCO.ORG>  
**Cc:** RAMV <abilene149@gmail.com>  
**Subject:** May 1 2018 Item 18.1 - Public Comment Opposing GPAs 1151 and 1152 (Dr. John Minnella-Romano)

Good morning Dr. Minnella-Romano,

The Clerk of the Board of Supervisors is in receipt of your letter below sent via email regarding Item 18.1, and has included it in the record for May 1, 2018.

Sincerely,

*Sue Maxwell*  
Board Assistant  
Clerk of the Board of Supervisors  
4080 Lemon Street, 1st Floor, Room 127  
Riverside, CA 92501  
(951) 955-1069 Fax (951) 955-1071

6810  
5/1/18 18.1

Mail Stop #1010

[smaxwell@rivco.org](mailto:smaxwell@rivco.org)

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**From:** Dr. John L. MINNELLA-Romano [<mailto:drjminnella@yahoo.com>]

**Sent:** Monday, April 30, 2018 5:15 PM

**To:** Supervisor Jeffries - 1st District <[district1@RIVCO.ORG](mailto:district1@RIVCO.ORG)>; District3 <[District3@Rivco.org](mailto:District3@Rivco.org)>; District5 <[District5@Rivco.org](mailto:District5@Rivco.org)>; District2 <[District2@Rivco.org](mailto:District2@Rivco.org)>; District 4 Supervisor V. Manuel Perez <[District4@RIVCO.ORG](mailto:District4@RIVCO.ORG)>; COB <[COB@RIVCO.ORG](mailto:COB@RIVCO.ORG)>; Hildebrand, John <[JHildebr@RIVCO.ORG](mailto:JHildebr@RIVCO.ORG)>; Brady, Russell <[rbrady@RIVCO.ORG](mailto:rbrady@RIVCO.ORG)>

**Cc:** RAMV <[abilene149@gmail.com](mailto:abilene149@gmail.com)>

**Subject:** GPA 1151 and 1152

April 30, 2018

Board of Supervisors  
of Riverside  
Administration Building  
Street, Fifth Floor  
Riverside, California 92501

County  
County  
4080 Lemon

Re: RAGLM Opposition to General Plan Amendments 1151 and 1152

Honorable Supervisors:

The Residents Association of Greater Lake Mathews ("RAGLM") officially opposes General Plan Amendments ("GPA") 1151 and 1152 presently before the County of Riverside. For the protection of the way of life and enjoyment of our communities, we join the Residents Association of Mead Valley ("RAMV") and other community groups in demanding the rejection of both proposals.

**ALREADY TRAFFIC-OVERBURDENED LOCAL ROADS.** These two warehouse proposals will create at least 800 tractor trailer truck trips per day. Most of these trucks will be using Decker to access Markham and travel to Cajalco Road. Parents take their children to Manual Real Elementary, Columbia Elementary School, Tomas Rivera Middle School and Citrus High School every day using Markham Street and Cajalco Road. Currently it takes at least 20 minutes for parents who live on Decker Road to turn right onto Markham so that they can take their children to school. The traffic is bumper to bumper all the way from Harvill to Markham to the schools.

**INAPPROPRIATE LOCAL ROADS.** Decker Road is a dirt road that is not county maintained and has no stop sign and no street sign. It is required as a secondary access for these two warehouses located at Decker and Oleander.

**ALREADY EXTREME DRIVING DANGER.** The roads that will be negatively affected by approval of GPA 1151 and 1152 are already extremely dangerous. Accidents, many of them fatal, occur nearly every day along Cajalco Road. Trucks will increase cars trying to pass on this two lane road. Many of these trucks and cars will use El Sobrante Road and then La Sierra to the I-91.

FURTHER ENCROACHMENT ON SUPPOSEDLY PROTECTED RURAL COMMUNITY LIFESTYLE. Approval of GPA 1151 and 1152 further encroaches on the rural community lifestyle long guaranteed to the residents of Greater Lake Mathews and Greater Mead Valley by the Riverside County Board of Supervisors. This attempted change to our existing General Plan zoning from rural to industrial contributes to the claimed change of community which is opposed by virtually all residents of our rural communities, making the promises of county government leaders to protect our community further unreliable and even hypocritical.

In conclusion, RAGLM believes approval of GPA 1151 and 1152 will substantially and needlessly increase the presence of commercial vehicle presence and traffic in our community, increasing air pollution, traffic death rates and injuries, the importation of crime, and reduced health, all to the destruction of our rural way of life. We respectfully call upon you to reject and deny approval of GPA 1151 and 1152.

Respectfully submitted.

FOR THE BOARD OF DIRECTORS OF  
**THE RESIDENTS ASSOCIATION OF  
GREATER LAKE MATHEWS**

John L. Minnella

President

Sincerely,

J.L. MINNELLA AND ASSOCIATES/MINNELLA ROMANO AND ASSOCIATES

[signed] Dr. John L. Minnella

California, USA address: 1820 East 17th Street, Santa Ana, California 92705-8604. Telephone: 714/543-9005; Facsimile: 714/542-2495. Email: [drjminnella@yahoo.com](mailto:drjminnella@yahoo.com) or [minnellalaw@sbcglobal.net](mailto:minnellalaw@sbcglobal.net). Affiliated offices

Maxwell, Sue

**From:** Maxwell, Sue  
**Sent:** Tuesday, May 8, 2018 2:55 PM  
**To:** 'Burrue, Daniel'; Supervisor Jeffries - 1st District  
**Cc:** District5; District 4 Supervisor V. Manuel Perez; District3; District2; Brady, Russell; Perez, Juan; Leach, Charissa  
**Subject:** Public Comment Received After Board Meeting - May 1, 2018 Item 18.1

<b>Tracking:</b>	<b>Recipient</b>	<b>Read</b>
	'Burrue, Daniel'	
	Supervisor Jeffries - 1st District	
	District5	
	District 4 Supervisor V. Manuel Perez	Read: 5/8/2018 2:58 PM
	District3	
	District2	
	Brady, Russell	
	Perez, Juan	Read: 5/8/2018 2:58 PM
	Leach, Charissa	

RECEIVED AFTER HEARING CLOSED

Good afternoon Mr. Burrue,

The Clerk of the Board of Supervisors is in receipt of your opposition letter sent via email regarding General Plan Amendment Nos 1151 and 1152 and Change of Zone Nos 7872 and 7873, and has included it in the public record for May 1, 2018, Item No 18.1 (6810).

Please note this item is being continued to the May 22, 2018 Board Meeting. The Agenda will be posted online at <https://www.rivcocob.org/> Thursday, May 17, 2018 after 3pm.

Sincerely,

*Sue Maxwell*  
Board Assistant  
Clerk of the Board of Supervisors  
4080 Lemon Street, 1<sup>st</sup> Floor, Room 127  
Riverside, CA 92501  
(951) 955-1069 Fax (951) 955-1071  
Mail Stop #1010  
[smaxwell@rivco.org](mailto:smaxwell@rivco.org)  
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**From:** Burrue, Daniel [mailto:dburrue@valverde.edu]  
**Sent:** Tuesday, May 8, 2018 11:20 AM  
**To:** Supervisor Jeffries - 1st District <district1@RIVCO.ORG>  
**Cc:** District5 <District5@Rivco.org>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; District3 <District3@Rivco.org>; District2 <District2@Rivco.org>; COB <COB@RIVCO.ORG>; Brady, Russell <rbrady@RIVCO.ORG>  
**Subject:** PLOT PLAN 26173

Greetings:

5/1/18 18.1  
2018-5-139670

Am writing to express my opposition to...

The two proposed warehouses at Oleander X Decker; GPA 1151 & 1152 - Knox Business Park Building D & E Project - Final Environmental Impact Report No. 546.

as well as...

The proposed warehouse at Rider X Harvill. PLOT PLAN NO. 26173  
Intent to Adopt a Mitigated Negative Declaration EA42984.

It is understood that although Supervisor Jeffries is not voting in favor of warehouses, a simple plot plan is all that is required for approval, which is deceptive to say the least.

I also understand that this project requires a general plan amendment. Besides my opposition to this, I have a question for the board: Why would you carry on in a surreptitious fashion?

I request that this letter of opposition be included in the public record. Thank you...

Cordially,

Daniel Burruel