Blum Collins, LLP – Letter BC

BC-1 This introductory comment does not raise an environmental issue; therefore, no further response is necessary.

BC-2 Refer to Final EIR Response to Comments B-14 and C-53 through C-56. Additionally, based on information currently on the California Air Resources Board's (CARB's) website (accessed April 19, 2018), CARB is still working on updating its Scoping Plan to address the Executive Order B-30-15 and SB-32 targets.[1] As such, no statewide comprehensive strategy has yet been adopted to meet these targets.

CEQA does not require the County to engage in a consistency analysis comparing the Project's projected 2050 GHG emissions with the long-term reduction goals presented in Executive Order No. S-3-05. CEQA provides that a lead agency may assess the Project's impacts on GHG emissions by evaluating the Project's compliance under a local plan for reduction or mitigation of GHG emissions. 14 Cal. Code Regs., §§15064(h)(3), 15064.4(b)(3). As such, the analysis of GHG impacts in the Project's Final Environmental Impact Report (FEIR) is appropriate and no changes are required. The evidence supporting this conclusion includes but is not limited to the discussion of these impacts in Subsection 4.7 of the FEIR and the citations noted therein, FEIR Technical Appendix B1, Responses to Comment Letter B (Comment B-14; FEIR pp. FEIR-156 and 157), and Comment Letter C (Comments C-53, C-56, and C-98; FEIR pp. FEIR-181, 182, and 194).

Regarding electrical vehicle (EV) charging stations, Buildings D and E are required to comply with the California Green Building Standards Code (CALGreen) which requires the installation of EV charging stations for passenger vehicles at newly-constructed non-residential buildings (see Cal Code of Regs., Title 24, Part 11, Chapter 5 "Nonresidential Mandatory Measures"). Thus, passenger car EV charging stations will be installed on the Project site. Regarding electric heavy-duty trucks, refer to Response ASE-4 Bullet Points (2) and (3) for a detailed response about zero-emission technologies for heavy-duty vehicles. In summary, technology is emerging for both electric-powered and hydrogen fuel cell-powered heavy-duty vehicles, and it is not yet known with any certainty what types of zero-emission heavy-duty vehicles, either electric, hydrogen fuel cell, or other, will be widely available in the future. As acknowledged by the International Council on Clean Transportation (ICCT) in a report titled "Transitioning to Zero-Emission Heavy Duty Freight Vehicles," all of the heavy-duty vehicle technologies analyzed by the ICCT world-wide are ". . . in research, exploratory, and in early demonstration phases" (ICCT, September 2017, p. 33)[2]. Because these technologies are still in research, exploratory, demonstration phase and new technologies may emerge, there is no assurance that any requirements that may be imposed on the Project by Riverside County related to the zero-emission heavy-duty vehicle technologies in their early stages of development have the capability of actually being used

[1] https://www.arb.ca.gov/cc/scopingplan/scopingplan.htm
[2] https://www.theicct.org/sites/default/files/publications/Zero-emission-freight-trucks_ICCT-white-paper_26092017_vF.pdf

in the future. The ICCC reported that "Tesla's announced battery electric semi-tractor prototype is the only (emphasis added) battery electric project we found in our [world-wide] assessment targeting long-haul heavy-duty applications" (ICCT, September 2017 p. 31); thus, requiring the Project to make a substantial investment to install electric heavy-duty truck infrastructure on the Project site with no reasonable assurance that this specific technology will actually be the one to emerge into widespread use is not required under CEQA, as mitigation must be feasible. Regarding solar panels, refer to FEIR Response to Comment C-30. In summary, because the primary source of the Project's air pollutant emissions is vehicles traveling to and from the Project site (tailpipe emissions), the addition of solar arrays to the building roofs will do very little to reduce the Project's air pollutant impacts. Only 0.13% of the Project's NOx emissions would result from energy sources (EIR Table 4.3-12). Similarly, only 0.08% of the Project's VOC emissions would result from energy sources (EIR Table 4.3-12). FEIR Mitigation Measure MM 4.3-8 requires the solar array on each building to be a minimum of 1KV, and also requires the buildings to accommodate the necessary electrical system and other infrastructure to accommodate larger PV arrays. The Project Applicant is proposing the Project on a speculative basis (meaning, the occupants of the proposed buildings are not yet known); thus, it is impractical at this point in time to determine the electrical needs of the (yet unknown) future occupants and the specific size of solar arrays that they would actually use.

BC-3 The commenter provides no support for how or why the FEIR's discussion of energy consumption is inaccurate. For new development such as the proposed Project, compliance with California Building Standards Code Title 24 energy efficiency requirements (CALGreen), combined with the mitigation measures and project design features that are identified in the FEIR are considered demonstrable evidence of efficient use of energy. As discussed below, the Project would provide for, and promote, energy efficiencies beyond those required under other applicable federal and State of California standards and regulations, and in so doing would meet or exceed all California Building Standards Code Title 24 standards. Moreover, energy consumed by the Project's operation is calculated to be comparable to, or less than, energy consumed by other industrial warehouse uses of similar scale and intensity that are currently constructed and operating in California. On the basis stated above, the Project would not result in the inefficient, wasteful, or unnecessary consumption of energy. The Project, as discussed in the FEIR, will implement several contemporary energy efficiency measures through compliance with the County's Climate Action Plan (CAP) (refer to Mitigation Measure MM 4.7-1 (FEIR p. 4.7-31)). Further, the Project would not cause or result in the need to construct additional energy-producing facilities or to install any energy delivery systems other than street-adjacent connections to existing local service lines to provide electricity and gas service to the Project site. The evidence supporting these conclusions includes, without limitation, the discussion of energy consumption in FEIR Subsection 5.4 and the citations noted therein, and FEIR Technical Appendix L.

BC-4 There is no requirement pursuant to CEQA that states the energy consumption analysis is somehow inadequate because it is located in the appendix. Regardless, and contrary to the statement in this comment, the energy consumption analysis was included in the Draft EIR. Refer to EIR § 5.4, *Energy Conservation*, pp. 5-5 through 5-14, as well as FEIR Technical Appendix L.

BC-5 The commenter provides an unsubstantiated opinion that the FEIR's conclusions related to NOx emissions calculated for the No Project/Existing General Plan Alternative (see FEIR Table 6.3, FEIR p. 6-25) are inaccurate. The conclusions regarding the No Project/Existing General Plan Alternative presented in the FEIR at pp. 6-17 through 27 and referenced by this comment are supported by technical quantifications prepared by Urban Crossroads, Inc., a professional transportation, air quality, and acoustical firm, using source data from the Institute of Transportation (ITE) Engineers Trip Generation Manual, 9th Edition, and the California Emission Estimator Model (CalEEMod). The calculations summary for air pollutant emissions are supplied in FEIR Table 6-1 and 6-2 (FEIR p. 6-20) and were supplied in a memorandum authored by Urban Crossroads dated February 13, 2018, contained in the County's administrative record for the Project, and cited as "Urban Crossroads 2018a" in the FEIR.

BC-6 The FEIR appropriately accounts for air emissions associated with a mechanical rock crusher should a crusher be used (see FEIR Response to Comment C-6 (FEIR pp. FEIR-162 and 163), and FEIR §§ 3.0, 4.6, 4.8, and 4.11). Since the time the FEIR was published, the Project Applicant has confirmed their intent to avoid the use of a mechanical rock crusher. Instead, rock fragments are proposed to be broken up by using crushing jaws on an excavator, thus, the air pollutants that would have been emitted by the mechanical rock crusher would not occur. Therefore, because the FEIR assumed the operation of a mechanical rock crusher simultaneously with the use of an excavator and other construction equipment (see FEIR Table 3-1, *Construction Equipment Assumptions*), the FEIR overstated, and not understated, air pollutant emissions that will occur during the Project's grading operation with elimination of the rock crusher. Using an excavator to break large pieces of rock into smaller pieces of rock would not produce any greater air pollutant emissions than were reported by the FEIR.

BC-7 Regarding FEIR Mitigation Measures MM 4.3-1(a)-(k), all components of the measure are required by use of the term "shall" except for sub-parts (i) and (j) that were not included in the DEIR and were added in the FEIR in response to Comment Letter C (Comments C-31(5) and C-31(10)). No quantified mitigation credit was taken for these two sub-parts in determining the significance conclusion for construction-related air quality emissions, which even without the addition of these two sub-parts is calculated to be mitigated to less than significant as shown in FEIR Table 4.3-11, *Emissions Summary of Overall Construction (With Mitigation).* Regarding Mitigation Measure 4.3-2, all components of the measure are required by use of the term "shall" except for power grid connections for small pieces of construction equipment; because, given the size of the property and the expected construction phases, it may not be possible to supply the entire site with electric power during the entire

duration of the construction process. Regardless, small pieces of construction equipment such as drills, saws, and compressors, are not a substantive, measurable source of air pollutant emissions as compared to larger pieces of equipment such as excavators, bulldozers, forklifts, cranes, etc. that are powered by diesel. Thus, regardless if these small pieces of equipment were electric powered or not, the significance conclusion reached by the FEIR would remain unchanged, and less than significant as shown by FEIR Table 4.3-11, *Emissions Summary of Overall Construction (With Mitigation).* Evidence in the form of calculations and quantitative model outputs is contained in FEIR Technical Appendices B1 and B2 and the appendices thereto.

BC-8 Refer to the FEIR Responses to Comment for the County's responses to all suggested mitigation measures. This comment does not identify which, if any, recommended mitigation measures have not been incorporated nor does this comment supply evidence that additional measures are feasible, are within the authority of Riverside County to impose and enforce and have a proportional nexus to the Project's impacts.

BC-9 This comment does not provide any specificity about the commenter's disagreement with the County's response to Comment Letter G (Blum Collins LLP and SWAPE). The general disagreement is noted and no response is required.

BC-10 Refer to FEIR Response to Comment B-6 (FEIR p. FEIR-150) and Comment C-23 (FEIR p. FEIR-167).

BC-11 The FEIR considered the Project's potential to impact agricultural resources and determined that impacts would be less than significant. The evidence supporting the FEIR's conclusions on impacts to agricultural resources includes, but is not limited to, the discussion of potential impacts in Subsection 4.2 of the FEIR and the citations noted therein and Responses to Comment Letter B (Comment B-4; FEIR p. FEIR-149), Comment Letter C (Comments C-17 through 22 and 63; FEIR pp. FEIR-165, 166, 167 and 184) and Comment Letter K (Comments K-11 and 12; FEIR pp. FEIR-229). The reference to *"worker"* in this comment pertains to Response to Comment C-21, wherein the response is referencing the County's Right-to-Farm Ordinance (Ordinance No. 625). This ordinance takes away the right for any person (including workers and businesses on the Project site) to file a nuisance complaint against an agricultural business that has been legally operating for three or more years.

BC-12 Refer to Final EIR § 5.3 for a discussion of potential growth inducing effects of the Project. Based on the substantial evidence provided throughout the FEIR and the citations included therein, the County has appropriately and factually concluded that the Project would not induce growth, and particularly unplanned growth, in the area. Growth in the area that is already planned and foreseeable was considered by the FEIR as part of its cumulative effects analysis and the list of past, present, and probable future projects are itemized in FEIR Table 4.0-1, *Cumulative Development Land Use Summary*, and shown on FEIR Figure 4.0-1, *Cumulative Development Location Map*. In addition, planned growth as called for by the

Riverside County General Plan and the General Plans of nearby cities is described in FEIR § 4.0.2.

The Riverside County General Plan designates the Project site and lands to the north and east for Community Development uses, which are intended for urban and suburban development (Riverside County General Plan, Chapter 3, Land Use). Lands to the west and the south are designated by the General Plan for Rural Community uses, which are intended for rural development (Riverside County General Plan, Chapter 3, Land Use). In order to induce unplanned growth to the west or to south of the Project site on properties in the Rural Community Foundation Component area, the County would need to consider and approve a Foundation Component General Plan Amendment, which under the County's Municipal Code (Riverside County Ordinance No. 348.4835 (B)), "Limitations on Foundation Component Amendments" that states "…no Foundation Component Amendment shall be heard or approved except as part of the Eight-Year General Plan Review Cycle. The first Eight-Year General Plan Review Cycle shall commence on January 1, 2008 and continue during the 2008 calendar year, and subsequent cycles shall occur at eight calendar year intervals thereafter." The last filing period for such amendment requests closed in June 2016, and the next cycle will not commence again until at least 2024. All Foundation Component Amendment requests are considered by a General Plan Advisory Committee ("GPAC"), the Planning Commission, and the County's Board of Supervisors, and are deliberated upon in depth by all three bodies. There is substantial evidence in the FEIR and the Project's administrative record to indicate that the Project would act as a physical demarcation between the Community Development and Rural Community Foundation Component areas in this portion of Mead Valley. Contrary evidence has not been presented to suggest that the Project would trigger unplanned growth in the Rural Community areas or in any other portions of the surrounding area.

BC-13 FEIR Mitigation Measure 4.4-1 requires that the Riverside County Biologist, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, and Western Riverside County Regional Conservation Authority be notified if burrowing owls are found on the Project site during the required preconstruction survey. These County, regional, State, and federal agencies are required to ensure compliance with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), including Objective 5 pertaining to the burrowing owl. Therefore, all requirements and policies related to burrowing owl will be fulfilled.

BC-14 This closing comment does not raise an environmental issue; therefore, no further response is necessary.

Law Offices of Abigail Smith – Letter ASE

ASE-1 These introductory comments summarize the commenter's general assertions and are noted. Refer to Responses to Comments ASE-2 through ASE-20.

ASE-2 Refer to FEIR Response to Comment B-6 (FEIR p. FEIR-150) and Response to Comment C-23 (FEIR p. FEIR-167) for detailed responses regarding the 191-foot distance measurement and its applicability to analyses contained in the FEIR. Exhibits that show the physical relationship/buffer from the Project site to off-site properties to the south along Redwood Drive are shown in the FEIR following Response to Comment E-91 (FEIR pp. FEIR-216 and 217).

As explained in FEIR Response to Comment E-31 (FEIR p. FEIR-202), the South Coast Air Quality Management District's (SCAQMD's) recommended buffer of 300 meters (1,000 feet), which is based on the California Air Resources Board (CARB) Land Use Handbook ("Handbook," April 2005), acknowledges that the 1,000-foot buffer distance is an advisory only, recommendation. To determine the actual health risk near a particular facility, CARB recommends that additional analysis be conducted. For the proposed Project, additional analysis was conducted and is contained in FEIR Technical Appendix B2, Mobile Source Health Risk Assessment (HRA). The HRA is based on substantial evidence and concludes that the Project would not pose a significant health risk to sensitive receptors in the surrounding area (refer to FEIR § 4.3, Air Quality).

Regarding noise, and as discussed in FEIR Subsection 4.11, the Project's noise impacts would be mitigated; resulting in less-than-significant noise impacts to sensitive receptors. The evidence supporting this conclusion includes, without limitation, the discussion in Subsection 4.11 of the FEIR and the citations noted therein, FEIR Technical Appendix I, Responses to Comment Letter B (Comment B-17; FEIR p. FEIR-158 and 159), Comment Letter C (Comments C-6, C-68 through 87; FEIR pp. FEIR-162, 163, and 186 through 191), Comment Letter E (Comments E-13, E-24, E-25, E-38, E-49, E-51, E-53, and E-68; FEIR pp. FEIR-199, 201, 203, 206, 208, and 211), Comment Letter K (Comments K-8, K-10, K-14, K-15, K-20, K-21, K-29, K-32, K-37, K-42, K-44, K-46, K-48, K-49, K-58, and K-64 (FEIR pp. FEIR-228 through 236), a memorandum prepared by Urban Crossroads dated April 2, 2018 and titled "Knox Business Park Buildings D and E Noise Barrier Memo" that is on file with Riverside County as part of the Project's administrative record, and responses to comment prepared by Urban Crossroads, Inc. and cited in the Final EIR as "Urban Crossroads 2017d" and "Urban Crossroads 2017e." Although only an 8-foot-high solid barrier is required at the southern boundary of the Building D Site to mitigate operational noise to less than significant levels, in order to further attenuate noise, the Project Applicant is proposing to install 14-foot-high concrete walls along the Building D Site southern boundary, rising to 20-foot-high concrete wall segments at the southwestern and southeastern corners of the Building D Site where the proposed truck courts would occur. The Urban Crossroads memo dated April 2, 2018, shows that a 14-foot-high barrier would attenuate noise levels an additional 2.4 decibels (dBA) below the mitigated, less-than-significant noise levels reported in the FEIR accomplished by an 8-foot-high barrier. A 20-foot-high barrier provides an additional 1.9 dBA reduction in noise levels. At the Building E Site, no noise attenuation is required at the southern boundary because no sensitive receptors would be significantly impacted by operational noise from the Building E Site (refer to FEIR

Subsection 4.11). Regardless, in order to further attenuate noise as calculated in the Urban Crossroads memo dated April 2, 2018, the Project Applicant is proposing to install a 14-foot-high concrete wall around the truck court and parking area proposed on the east side of the building, rising to a 20-foot-high wall segment near the southernmost loading bay.

ASE-3 Refer to the FEIR Responses to Comment for the County's responses to all suggested mitigation measures. Regarding Mitigation Measure 4.3-2, all components of the measure are required by use of the term "shall" except for power grid connections for small pieces of construction equipment; given the large size of the property and the expected construction phases, it may not be possible to supply the entire site with electric power during the entire duration of the construction process. Regardless, most small pieces of construction equipment such as drills, saws, and compressors, are electric/battery powered and not a substantive, measurable source of air pollutant emissions as compared to larger pieces of equipment such as excavators, bulldozers, forklifts, cranes, etc. that are most typically powered by diesel. Thus, regardless if these small pieces of equipment were electric powered or not, the significance conclusion reached by the FEIR would remain unchanged, and less than significant as shown by FEIR Table 4.3-11, *Emissions Summary of Overall Construction (With Mitigation).* Evidence in the form of calculations and quantitative model outputs is contained in FEIR Technical Appendices B1 and B2 and the appendices thereto.

ASE-4 (1) The County has imposed a condition of approval on the Project as additional mitigation for mobile source air pollutant emissions that "Tenants shall maintain records on its fleet equipment and ensure that all diesel-fueled Medium-Heavy Duty Trucks (MHDT) and Heavy-Heavy Duty Trucks (HHD) accessing the project site use year 2010 or newer engines. The records shall be maintained on-site and be made available for inspection by the County."

ASE-4 (2) and (3): Riverside County acknowledges that technological advancements in the transportation sector are advancing and will continue to advance and phase into use over time. Yet, there are still many unknowns and much speculation about the nature and pace of such advancements becoming available in mass. For example, since publication of the FEIR in March 2018, the Southern California Association of Governments (SCAG) issued a request for proposals (RFP) on April 11, 2018, to undertake a study in San Bernardino County (which like Riverside County is under the purview of SCAG) that, when complete, will identify implementation strategies for clean vehicle and fuels technology (for both passenger vehicles and freight) in the SCAG region. SCAG states in the RFP that the "basic question to be addressed in this project is: *'How can local and regional agencies and the private sector advance the rate of penetration of clean vehicle and fuels technology locally to proactively achieve both air quality and economic goals, and what is a feasible timeline for that progress to occur?'*" (SCAG, 2018). Many other related questions are posed in SCAG's RFP, which is evidence that even SCAG, which serves as the regional Council of Governments for Southern California, needs to undertake further study to answer questions about the feasibility and timelines for advancement of engine and fuel technologies related to freight movement.

As reported by the International Council on Clean Transportation (ICCT) in a report titled "Transitioning to Zero-Emission Heavy Duty Freight Vehicles," the ICCT provides an overview of advancing technologies (ICCT, September 2017)[3]. In agreement with the paragraph above, ICCT reports that although the technology is advancing and although at some point in the distant future non-diesel technology will likely be used in mass to power freight movement, "zero-emission vehicle technologies do present considerable challenges. They have a combination of near- and long-term barriers, issues, and questions that will have to be addressed before they can become widespread replacements for conventional trucks and tractor-trailers that are typically diesel fueled" (ICCT, p. 31). "Tesla's announced battery electric semi-tractor prototype is the only (emphasis added) battery electric project we found in our [world-wide] assessment targeting long-haul heavy-duty applications" (ICCT, p. 31). Instead of electric, "[h]ydrogen fuel cell heavy-duty vehicles could play a key role for low-carbon freight transport in several applications" (ICCT, p. 32). The ICCT further reports that their detailed analysis ". . . indicates that these technologies will be insufficient (emphasis added) to achieve decarbonization of heavy-duty vehicles by 2050" (ICCT, p. 32). "As technology solutions emerge, questions about how best to sequence the rollout of infrastructure in advance of vehicle deployment, and avoid technology lock-in or stranded assets, will become more important" (ICCT, p. 33).

In summary, imposing specific restrictions and requirements on the proposed Project related to emerging technology and phase-in timelines, when the various types of technological advancements and their timeframes for common availability are not known with any certainty, provides no to little assurance that restrictions and requirements that may be imposed on the Project by the County related to zero-emission technologies could feasibly be implemented and enforced, or would ever be used (or be capable of being used) by the building user. CEQA does not require the incorporation of mitigation that is infeasible, nor must an EIR analyze in detail mitigation measures that it concludes are infeasible (*Clover Valley Foundation v. City of Rocklin* (2011) 197 Cal. App.4th 200, 245; *Cherry Valley Pass Acres and Neighbors v. City of Beaumont* (2010) 190 Cal. App.4th 316, 351). As acknowledged by the ICCT, all of the heavy-duty vehicle technologies analyzed by the ICCT world-wide are ". . . in research, exploratory, and early demonstration phases" (ICCT, p. 33). Also, ". . . these technologies will require sustained investments by government and industry" (ICCT, p. 33). For example, "electric highways will require extensive charging (at central stations, with overhead transmission, or inductive road charging). And, ". . . investments in low-carbon and low-cost hydrogen pathways and refueling infrastructure will have to be made in parallel with vehicle technology advances" (ICCT, p. 33). There is no known timeframe for when these costly and widespread investments by the government and utility industries will be accomplished and available.

[3] https://www.theicct.org/sites/default/files/publications/Zero-emission-freight-trucks_ICCT-white-paper_26092017_vF.pdf

ASE-4 (4): The Project's condition of approval that implements Mitigation Measure MM 4.3-11 will be revised to add reference to forklifts, as follows:

> MM 4.3-11: Developer and all successors shall stipulate in building lease and sale agreements that yard trucks and forklifts shall not be fueled with diesel.

ASE-4 (5): Mitigation Measure 4.3-11 already prohibits the use of diesel-fueled yard trucks.

ASE-4 (6): CEQA requires that an EIR evaluate the proposed Project based on reasonable assumptions and foreseeable actions. The number of truck trips that the Project is expected to generate is based on Institute of Transportation Engineers (ITE) Trip Generation Manual 9th Edition and SCAQMD recommendations, which rely on surveyed data from other high cube warehouse buildings, which is reasonable and reliable information. The comment does not present any evidence that truck trips associated with the Project would be greater than disclosed in the DEIR. Instituting a cap on the number of trucks that can access the Project's building is not required under CEQA. The FEIR has made reasonable assumptions based on substantial evidence by using ITE and SCAQMD recommendations based on the Project's design and expected occupant type.

ASE-4 (7): The County has recommended a condition of approval on the Project that prohibits refrigerated warehouse space.

ASE-5 Refer to the FEIR Responses to Comment for the County's response to all suggested mitigation measures. The commenter is inaccurate in their statement that the Project has utterly failed to take meaningful steps to reduce NOx emissions during operations. Refer to FEIR Mitigation Measures MM 4.3-3, 4.3-4, 4.3-5, 4.3-6, 4.3-7, 4.3-10, and 4.3-11 (FEIR pp. 4.3-38 and 4.3-39). The County has imposed a condition of approval on the Project as additional mitigation for mobile source air pollutant emissions that "Tenants shall maintain records on its fleet equipment and ensure that all diesel-fueled Medium-Heavy Duty Trucks (MHDT) and Heavy-Heavy Duty Trucks (HHD) accessing the project site use year 2010 or newer engines. The records shall be maintained on-site and be made available for inspection by the County." The County has also applied conditions of approval on the Project as mitigation for air pollutant emissions that would limit engine idling to three-minutes, prohibit refrigerated warehouse space (and thus transport refrigeration unit (TRU) operation on-site), and prohibit the use of diesel-fueled yard trucks and forklifts. Further, the Project is required to comply with the California Green Building Standards Code (CALGreen), which requires among many other items the installation of EV charging stations for passenger cars and the provision of bicycle parking spaces and preferred parking spots for clean air and carpool vehicles. This comment does not supply evidence that additional operational-related mitigation measures are feasible, are within the authority of Riverside County to impose and enforce and have a proportional nexus to the Project's impacts.

ASE-6 The comment suggests that because the adopted Riverside County Climate Action Plan (CAP) includes targets to 2020, that reliance on the CAP is somehow invalid to rely upon to

reduce GHG impacts to less than significant, and the Project should somehow be obligated to demonstrate consistency with the Executive Order's B-30-15 target of 40 percent below 1990 levels by 2030 and S-3-05 target of 80% below 1990 levels by 2050. No statewide comprehensive strategy has yet been adopted to meet these targets. As a general matter of course, Riverside County will be updating its CAP to identify specific targets for greenhouse gas (GHG) reductions for 2035 and 2050, but the CAP has not yet been updated and no targets have yet been identified by Riverside County for 2035 and 2050.

CEQA does not require the County to engage in a consistency analysis comparing the Project's projected 2050 GHG emissions with the long-term reduction goals presented in Executive Order No. S-3-05. CEQA provides that a lead agency may assess the Project's impacts on GHG emissions by evaluating the Project's compliance under a local plan for reduction or mitigation of GHG emissions. 14 Cal. Code Regs., §§15064(h)(3), 15064.4(b)(3). As such, the analysis of GHG impacts in the Project's Final Environmental Impact Report (FEIR) is appropriate and no changes are required. The evidence supporting this conclusion includes but is not limited to the discussion of these impacts in Subsection 4.7 of the FEIR and the citations noted therein, FEIR Technical Appendix B1, Responses to Comment Letter B (Comment B-14; FEIR pp. FEIR-156 and 157), and Comment Letter C (Comments C-53, C-56, and C-98; FEIR pp. FEIR-181, 182, and 194).

ASE-7 Refer to the FEIR Response to Comment B-14 for the County's detailed response explaining why Project compliance with the approved Riverside County Climate Action Plan (CAP) constitutes a less than significant greenhouse gas (GHG) impact under CEQA, supported by evidence including but not limited to, the discussion of GHG impacts in Subsection 4.7 of the FEIR and the citations noted therein, FEIR Technical Appendices B1 and L, Responses to Comment Letter B (Comment B-14; FEIR pp. FEIR-156 and 157), and Comment Letter C (Comments C-53, C-56, and C-98; FEIR pp. FEIR-181, 182, and 194). Refer to Final EIR Response to Comment C-30 regarding the Project's provision of photovoltaic (PV) panels at a minimum of 1 kilowatt (KW). Regarding electrical vehicle (EV) charging stations, Buildings D and E are required to comply with the California Green Building Standards Code (CALGreen) which requires the installation of EV charging stations for passenger vehicles at newly-constructed non-residential buildings (see Cal Code of Regs., Title 24, Part 11, Chapter 5 "Nonresidential Mandatory Measures.)" In mandatory compliance with CALGreen and the California Electrical Code, the Building D and Building E electrical panels are required to be sized to accommodate the number of EV charging stations mandated by CALGreen. Refer to Response ASE-4(3) for a response about zero-emission technologies for heavy-duty vehicles.

ASE-8 Refer to Final EIR Response to Comment C-30 (FEIR pp. FEIR-168 and 169) and David Drake's testimony quoted in Response ASE-4, above. The NO_X emissions reduction potential of a PV system depends more on the characteristics of the regional electricity system than on the available PV (solar) resource at the Project site. In other words, if the delivery of traditional electricity by the power company (Southern California Edison (SCE))

requires the burning of fossil fuels to produce electricity, then the use of solar would reduce the NO_X emissions that SCE would emit from generating and delivering traditional electric power. In the case of the proposed Project, 0.61 lbs/day of NOx are calculated to be emitted from energy sources, compared to a maximum of 438.45 lbs/day from all NO_X emission sources, the majority of which are mobile sources (vehicle tailpipe emissions). Refer to FEIR Table 4.3-12, *Summary of Peak Operational Emissions (With Mitigation)*. Thus, the County maintains that there is not a proportional nexus between a requirement to maximize PV panels, when even if 100% of the Project's electricity could be provided by PV, the NO_X reduction would be at most just 0.13% of the Project's total NOx emissions.

ASE-9 The County has added a condition of approval on the Project that will restrict heavy vehicles, through a weight restriction, from traveling on Decker Road (Ellsworth Street) south of Oleander Avenue. With the addition of this condition, it is reasonably assured that Project-related truck traffic will not use this roadway segment. As such, the truck distribution assumptions used in the FEIR's traffic analysis and vehicular-related air quality and noise analyses are supported.

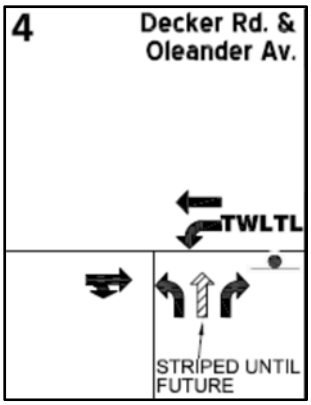
ASE-10 Refer to Final EIR Responses to Comment C-4 and C-94 (FEIR pp. FEIR-161 and 162) for a complete response to this comment.

ASE-11 The Project's significant and unavoidable impact to the intersection of Decker Road (Ellsworth Street) and Oleander Avenue is a cumulatively considerable impact, and not a direct impact. Refer to FEIR Response to Comment E-41 (FEIR pp. FEIR-203 and 204) which explains that a traffic signal will be needed by Year 2035, but a traffic signal is not warranted in the near-term. The evidence supporting the response includes but is not limited to, the discussion of impacts at this intersection and the recommendation mitigation thereof, in Subsection 4.15 of the FEIR and the citations noted therein, FEIR Technical Appendices J1 and J2, and responses to comment prepared by Urban Crossroads, Inc. and cited in the Final EIR as "Urban Crossroads 2017d."

Based on the Project's applications on file with Riverside County, the following improvements to the Decker Road (Ellsworth Street)/Oleander Avenue intersection will be constructed by the Project, and the intersection will maintain an acceptable level of service in the near-term, as shown in FEIR Table 4.15-16, *Existing plus Project (E+P) Intersection Analysis*, Table 4.15-17, *Opening Year (2017) Intersection Analysis (E+A+P)*, and Table 4.15-18, *Opening Year (2017) plus Cumulative Intersection Analysis (E+A+P=C).* (Level of Service (LOS) A is calculated for the AM and PM peak hours in the near-term).

> Project's Proposed Improvements at the Decker Road (Ellsworth Street)/Oleander Avenue Intersection: The full width of Decker Road (Ellsworth Street) and half-width (southern side) of Oleander Avenue will be installed, with asphalt paving, sidewalk, ADA concrete ramps, curb and gutter, signing and striping, and street lighting. At the intersection, northbound Decker Road (Ellsworth Street) will be striped for a right-turn lane, left turn-lane and a future thru-lane that will be cross-striped until the thru-lane is

available in the future north of Oleander Avenue. A stop sign will be installed at this location. Oleander Avenue will be striped for an eastbound lane, a westbound lane, and westbound turn lane onto southbound Decker Road (Ellsworth Street) as shown in the diagram below.



Source: FEIR Technical Appendix J1, Exhibit 1-3, Site Adjacent Roadway and Site Access Recommendations

ASE-12 In Year 2035, the Decker Road (Ellsworth Street)/Oleander Avenue intersection is calculated to operate at an unacceptable level of service (LOS F as shown in FEIR Table 4.15-19) with or without the addition of Project-related traffic. In Year 2035, the Project is calculated to contribute 5.5% of the total traffic at this location (refer to Table 1-5 in FEIR Technical Appendix J1 for the 5.5% calculation). Because the timing of implementation for the ultimate improvements at this intersection (that are projected to be needed in Year 2035 to maintain an acceptable level of service (LOS D or better)) cannot be assured with certainty, the Project's cumulatively considerable impact at this intersection is appropriately identified as significant and unavoidable in the FEIR. Because Year 2035 is 17 years into the future, and because the timing for cumulative projects to be built and occupied (which will contribute traffic to this intersection by 2035) is not known with certainty, it is too speculative to identify now when the full funding will be secured, and when and how the ultimate improvements needed in Year 2035 will be fully implemented. The commenter's assertion that the Applicant is required to fund or construct the intersection improvements based on a cumulative traffic contribution of 5.5% would be unreasonable and inappropriate under CEQA.

ASE-13 Riverside County does not have a funding mechanism in place for improvements to Caltrans facilities. Therefore, absent an established funding program, there is no mechanism by which the Project Applicant can contribute mitigation fees. Further, Riverside County is not obligated to establish funding mechanisms for transportation improvements that are the responsibility of other governmental jurisdictions, including State agencies such as Caltrans. For this reason, the FEIR concludes that the Project's significant cumulative traffic impact to Caltrans facilities is significant and unavoidable.

ASE-14 The County has imposed conditions of approval on the Project to require the Project Applicant to construct and maintain the trail segments on the Project site that will occur on the south side of Oleander Avenue and the east side of Ellsworth Street until the trails are dedicated. A Project condition of approval requires the Project Applicant to offer the trail easements for dedication prior to building permit issuance to the Riverside County Regional Park and Open-Space District or a County-managed Landscape and Lighting Maintenance District for trails purposes. Said easements will offered on behalf of the vested interest of the citizens of Riverside County.

ASE-15 For new development such as the proposed Project, compliance with California Building Standards Code Title 24 energy efficiency requirements (CALGreen), combined with the mitigation measures and project design features that are identified in the FEIR are considered demonstrable evidence of efficient use of energy. As discussed below, the Project would provide for, and promote, energy efficiencies beyond those required under other applicable federal and State of California standards and regulations, and in so doing would meet or exceed all California Building Standards Code Title 24 standards. Moreover, energy consumed by the Project's operation is calculated to be comparable to, or less than, energy consumed by other industrial warehouse uses of similar scale and intensity that are currently constructed and operating in California. On the basis stated above, the Project would not result in the inefficient, wasteful, or unnecessary consumption of energy. The Project, as discussed in the FEIR, will implement several contemporary energy efficiency measures through compliance with the County's CAP (refer to Mitigation Measure MM 4.7-1 (FEIR p. 4.7-31). Further, the Project would not cause or result in the need to construct additional energy-producing facilities or to install any energy delivery systems other than street-adjacent connections to existing local service lines to provide electricity and gas service to the Project site. The evidence supporting these conclusions includes, without limitation, the discussion of energy consumption in FEIR Subsection 5.4 and the citations noted therein, and FEIR Technical Appendix L.

ASE-16 Refer to Final EIR Response to Comments B-8, C-64, C-99, E-3, E-88, and K-6 (FEIR pp. FEIR-151, 183, 194, 195, 196, 214, and 227). As fully explained in the referenced responses, development of business park uses on the Project site would worsen traffic, and vehicular-related air quality, GHG, and noise impacts compared to impacts that would occur from the proposed Project. The Institute of Transportation Engineers' (ITE) Trip Generation Manual 9th Edition assigns 12.44 daily trips per 1,000 square feet of business park use (Business Park ITE Code 770), whereas the ITE Manual assigns only 1.62 daily trips per 1,000 square feet of high cube warehouse use (High Cube Warehouse ITE Code 152). The FEIR contains five (5) alternatives, which is a reasonable range of potentially feasible alternatives. Under the rule of reason, an EIR need discuss only those alternatives necessary to permit a reasoned choice. The five (5) alternatives presented in the FEIR permit a reasoned choice. The No Project/Existing General Plan Alternative (see FEIR Subsection 6.3.2), demonstrates that even with only partial development of the site with uses permitted by the General Plan's Business Park land use designation (using ITE Code 130, Industrial Park, at 6.83 daily trips

per 1,000 square feet of building space instead of ITE Code 770, Business Park, at 12.44 daily trips per 1,000 square feet of building space), impacts would be greater than would occur under the proposed Project.

ASE-17 Dismissal of the Building D Only Alternative is under consideration by the County because this alternative would reduce, but not avoid the Project's significant unavoidable impacts to air quality, land use/planning, noise, and transportation. Also, the Building D Alternative would fail to meet most of the Project's objectives; specifically, this alternative would not meet Objective B (maximize buildout potential of employment-generating uses) and would only partially meet all of the other Project objectives. Most particularly, because the Building D Only Alternative would leave an entire parcel vacant and unproductive, this alternative would provide fewer economic opportunities, job growth, and generate less tax revenue for the County of Riverside. In addition, the selection of this alternative, while preventing full development of the property with business park uses, would not satisfy demand for logistics business park development in the SCAG region to the same extent as the proposed Project. Thus, the regional demand for logistics buildings and the environmental effects associated with the development of these uses would very likely be displaced to other properties. (FEIR pp. 6-35 through 6-36)

In response to the comment regarding job growth, as reported by the Press Enterprise on March 7, 2018, "the Inland Empire is leading California in job creation"[4] Inland Empire economist John Husing was quoted in the article stating that "the region's logistics sector — which includes wholesale trade, transportation and warehousing — is the Inland Empire's biggest job creator."

ASE-18 Dismissal of the Larger Building Alternative is under consideration by the County because this alternative would result in similar if not identical impacts as would occur under the proposed Project under all environmental topics with the exception of air quality and operational traffic. Construction-related air quality impacts would increase because more construction activity would occur on a daily basis. Operational-related diesel particulate matter (DPM) exposure to off-site populations may increase because the building's loading docks and truck courts would be located closer to sensitive receivers and face south toward sensitive receptors. Also, the loss of the Ellsworth Street segment through the center of the property would cause other local roads to carry a greater volume of passenger car traffic. Although the Larger Building Alternative would meet all of the Project's objectives, it would not have any environmental advantages over the proposed Project. (FEIR p. 6-51)

The FEIR contains five (5) alternatives, which is a reasonable range of potentially feasible alternatives. Under the rule of reason, an EIR need discuss only those alternatives necessary to permit a reasoned choice. The five (5) alternatives presented in the FEIR permit a reasoned choice. As stated in the FEIR (p. 6-44), the Larger Building Alternative would require truck loading bays on the south-facing side of the building (facing off-site properties to the south),

[4] https://www.pe.com/2018/03/07/the-inland-empire-is-leading-california-in-job-creation/

whereas the proposed Project faces its loading bays inward toward Ellsworth Street and eastward toward I-215. Placing loading bays on the south-facing side of the building would be more impactful to sensitive receptors located to the south, albeit these operational impacts would be able to be mitigated to the same extent as the proposed Project.

ASE-19 This closing comment does not specify any errors or emissions or recommend any specific, additional mitigation measures or alternatives. Refer to Responses ASE-2 through ASE-18.

ASE-20 This closing comment does not raise an environmental issue; therefore, no further response is necessary.

Rural Association of Mead Valley – Letter RAMV

RAMV-1 This comment is verbatim to FEIR Comment E-1; therefore, refer to FEIR Response to Comment E-1.

RAMV-2 This comment is verbatim to FEIR Comment E-2; therefore, refer to FEIR Response to Comment E-2.

RAMV-3 This comment is verbatim to FEIR Comment E-3; therefore, refer to FEIR Response to Comment E-3.

RAMV-4 This comment is verbatim to FEIR Comment E-4; therefore, refer to FEIR Response to Comment E-4. The addition of the excerpt of the Mead Valley Area Plan exhibit is acknowledged by the County. No further response is needed.

RAMV-5 This comment is similar to FEIR Comment E-5; therefore, refer to FEIR Response to Comment E-5. The commenter's additional claim that the logistics warehouses will attract low paying temporary jobs is unsupported. As reported by the Press Enterprise on March 7, 2018, "the Inland Empire is leading California in job creation."[5] Inland Empire economist John Husing was quoted in the article stating that "the region's logistics sector — which includes wholesale trade, transportation and warehousing — is the Inland Empire's biggest job creator." Also, the Planning Commission Staff Report, dated April 4, 2018, page 15 of 23, Item #3 states, the Project site has been vacant since its designation as a Business Park in 2003. In the fifteen years since, the Project site has been unable to attract a viable development or project with its current land use designation. The proposed Project presents a viable use for the site with a Light Industrial land use designation, with jobs created by the construction of the Project and the potential for additional jobs once construction is completed, depending upon the end user of the site. Additionally, the market for warehouse type buildings has been a continuing trend in the area as represented with the number of warehouse type buildings along Interstate 215. Comparatively, the amount of traditional business park development with an emphasis on office type uses is not as desirable in the area as evidenced by the proportion of warehouse type buildings to business park/office

[5] https://www.pe.com/2018/03/07/the-inland-empire-is-leading-california-in-job-creation/

buildings in the area. Therefore, it is the warehouse building that is more capable of creating greater employment sooner.

RAMV-6 This comment is verbatim to FEIR Comment E-6; therefore, refer to FEIR Response to Comment E-6.

RAMV-7 This comment is verbatim to FEIR Comment E-7; therefore, refer to FEIR Response to Comment E-7.

RAMV-8 This comment is similar to FEIR Comment E-8, with an additional statement that truck traffic persists on Harvill Avenue during some peak hours of operation. This claim is unsupported. Refer to Response to Comments C-96 and E-8 that cite photographs that are included in the County's administrative record dated August 15, 2017, September 12, 2017, and February 2, 2018, that show that the stacking issue was no longer occurring on Harvill Avenue (TCC, 2017a-i). The commenter supplied no further substantial evidence contrary to Response to Comment C-96.

RAMV-9 Refer to FEIR Responses E-10, E-20, E-54, E-57, E-78, G-5 and K-25 that cite CEQA Guidelines § 15125(a) and/or the August 2015 Notice of Preparation, and the EIR's evaluation of the other 103 past, present, and reasonably foreseeable projects within the study area. Refer to FEIR Table 4.0-1 and Figure 4.0-1 for a list and location map for these cumulative projects, which include numerous high-cube warehouse projects in the vicinity. Pursuant to CEQA Guidelines § 15125(a), "[a]n EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced…" The Notice of Preparation (NOP) for the proposed Project was released for public review on August 31, 2015; thus, for purposes of analysis within the EIR, impacts of the proposed Project must be evaluated against the physical environmental conditions that existed as of August 2015.

RAMV-10 This comment is verbatim to FEIR Comment E-9; therefore, refer to FEIR Response to Comment E-9.

RAMV-11 With the exception of the omission of two sentences, this comment is verbatim to FEIR Comment E-10; therefore, refer to FEIR Response to Comment E-10.

RAMV-12 Refer to Response to Comment RAMV-9, above, and FEIR Response to Comments E-10, E-20, E-78, and K-25 that cite CEQA Guidelines § 15125(a) and/or the August 2015 Notice of Preparation, and the EIR's evaluation of the other 103 past, present, and reasonably foreseeable projects within the study area.

RAMV-13 This comment is verbatim to FEIR Comment E-11; therefore, refer to FEIR Response to Comment E-11. The claim that trucks may back up onto Decker Road and Harvill Avenue was addressed by FEIR Response to Comment C-96, which cites photographs that are included in the County's administrative record dated August 15, 2017,

September 12, 2017, and February 2, 2018, that show that the stacking issue was no longer occurring on Harvill Avenue (TCC, 2017a-i).

The Building D and Building E Sites are designed to allow for sufficient truck stacking interior to the Project site boundaries at all entry gates. Two truck entry driveways are proposed on the Building D Site. The westernmost entry is designed to contain two lanes and supply room for three full-sized tractor trailers to stack in each lane while waiting to check in at the gate (stacking for 6 trucks total). The easternmost entry is designed with two lanes and supplies room for four full-sized (approximately 75-foot long) tractor trailers to stack in each lane while waiting to check in at the gate (stacking for 8 trucks total). Based on the number of peak hour trips expected (FEIR Table 4.15-14), 21 trucks would arrive to the Building D in the AM peak hour and 28 trucks would arrive in the PM peak hour. Fewer trucks per hour would arrive at all other times of the day. Given that 14 stacking spaces would be available to accommodate at most 28 trucks arriving over a peak hour, more than enough stacking is provided on the Building D Site. One truck entry driveway is proposed on the Building E site, which would contain two lanes and room for four full-sized (75-foot-long) tractor trailers to stack in each lane (stacking for 8 trucks total). Based on the number of peak hour trips expected (FEIR Table 4.15-14), 17 trucks would arrive to the Building E Site in the AM peak hour and 22 trucks would arrive in the PM peak hour. Fewer trucks per hour would arrive at all other times of the day. Given that 8 stacking spaces would be available to accommodate at most 22 trucks arriving over a peak hour, more than enough stacking is provided on the Building E Site. In a typical warehouse operation, trucks with gate passes would be able to move quickly though the gate. Trucks without gate passes would need to check-in, which typically takes only a few minutes.

RAMV-14 This comment is verbatim to FEIR Comment E-12; therefore, refer to FEIR Response to Comment E-12.

RAMV-15 This comment is verbatim to FEIR Comment E-13; therefore, refer to FEIR Response to Comment E-13.

RAMV-16 Refer to FEIR Responses C-4, E-35, E-36, E-37, E-38, E-39, E-40, and E-42 for detailed responses to this comment.

RAMV-17 This comment is verbatim to FEIR Comment E-14; therefore, refer to FEIR Response to Comment E-14.

RAMV-18 This comment is verbatim to FEIR Comment E-15; therefore, refer to FEIR Response to Comment E-15.

RAMV-19 This comment is similar to FEIR Comment E-16, with the addition of one sentence; therefore, refer to FEIR Response to Comment E-16, which refers to Response to Comment E-11. Regarding the commenter's additional statement about idling, evidence that trucks will not be stacking and idling on local roads is supplied in FEIR Response to Comments C-36(8), C-66, and C-96.

RAMV-20 This comment is similar to FEIR Comment E-17, with a few minor wording changes and the addition of one sentence; therefore, refer to FEIR Response to Comment E-17, which refers to FEIR Response to Comments C-4 and C-96. Regarding the commenter's additional statements about idling, evidence that trucks will not be stacking and idling on local roads is supplied in FEIR Response to Comments C-36(8), C-66, and C-96.

RAMV-21 This comment is similar to FEIR Comment E-18 with an additional statement noting the project totals over 1.1 million square feet. Refer to Response to Comment E-18. The statement that the project would result in over 1.1 million square feet of building space is an accurate statement.

RAMV-22 This comment is verbatim to FEIR Comment E-19; therefore, refer to FEIR Response to Comment E-19.

RAMV-23 This comment is similar to FEIR Comment E-20 with an additional statement about crime and homeless camps. Refer to FEIR Response to Comment E-20. There is no connection between the proposed Project and alleged crime and homelessness. The Project is intended to help the County alleviate crime and homelessness by injecting additional economic activity into the Mead Valley area.

RAMV-24 This comment is verbatim to FEIR Comment E-21; therefore, refer to FEIR Response to Comment E-21.

RAMV-25 This comment is similar to FEIR Comment E-22 with an additional statement regarding the Project's proposed 55-foot maximum building height. Refer to FEIR Response to Comments C-9, E-77, K-9, K-27, and R-57 which note the ALUC staff report and proposed maximum 55-foot height of the buildings. The maximum building height accounts for the exterior height of the building, including all rooftop apparatus. According to the Institute of Transportation Engineers (ITE) Trip Generation Manual, 9th Edition, traffic generation is based on the building occupant type and square footage of building floor space, not building height. Thus, the building height is immaterial to the calculation of traffic generation and vehicular-related air quality and noise impacts. There are no other components of building height that would result in increased air pollution or noise impacts, as nearly all operational activities other than truck loading, unloading, and vehicle maneuvering would occur inside, and not outside of, the buildings.

RAMV-26 This comment is verbatim to FEIR Comment E-23: therefore, refer to FEIR Response to Comment E-23.

RAMV-27 This comment is verbatim to FEIR Comment E-24: therefore, refer to FEIR Response to Comment E-24.

RAMV-28 These factual comments and quotes from the Riverside County General Plan, Chapter 7, are noted; no response is required.

RAMV-29 This quote from the Riverside County General Plan, Chapter 7, p. N-4, is noted; no response is required.

RAMV-30 As noted in FEIR Technical Appendix M (p. 60), the Project is consistent with General Plan Policy N 6.3 noted in this comment. As discussed in FEIR Subsection 4.11, Noise, the Project's noise impacts would be fully mitigated; therefore, hour restrictions are not required. The evidence supporting this conclusion includes, without limitation, the discussion in Subsection 4.11 of the FEIR and the citations noted therein, and FEIR Technical Appendix I, Responses to Comment Letter B (Comment B-17; FEIR p. FEIR-158 and 159), Comment Letter C (Comments C-6, C-68 through 87; FEIR pp. FEIR-162, 163, and 186 through 191), Comment Letter E (Comments E-13, E-24, E-25, E-38, E-49, E-51, E-53, and E-68; FEIR pp. FEIR-199, 201, 203, 206, 208, and 211), Comment Letter K (Comments K-8, K-10, K-14, K-15, K-20, K-21, K-29, K-32, K-37, K-42, K-44, K-46, K-48, K-49, K-58, and K-64 (FEIR pp. FEIR-228 through 236), a memorandum prepared by Urban Crossroads dated April 2, 2018 and titled "Knox Business Park Buildings D and E Noise Barrier Memo" that is on file with Riverside County as part of the Project's administrative record, and responses to comment prepared by Urban Crossroads, Inc. and cited in the Final EIR as "Urban Crossroads 2017d" and "Urban Crossroads 2017e."

RAMV-31 As explained in FEIR Response to Comment E-31 (FEIR p. FEIR-202), the South Coast Air Quality Management District's (SCAQMD's) recommended buffer of 300 meters (1,000 feet), which is based on the California Air Resources Board (CARB) Land Use Handbook ("Handbook," April 2005), acknowledges that the 1,000-foot buffer distance is an advisory only recommendation. To determine the actual health risk near a particular facility, CARB recommends that additional analysis be conducted. For the proposed Project, additional analysis was conducted and is contained in FEIR Technical Appendix B2, Mobile Source Health Risk Assessment (HRA). The HRA is based on substantial evidence and concludes that the Project would not pose a significant health risk to sensitive receptors in the surrounding area (refer to FEIR § 4.3, Air Quality).

RAMV-32 These quotes from the Riverside County General Plan and Municipal Code are noted. Regarding General Plan Policy N 15.2, no response is required; the Project does not propose commercial uses or mixed-use structures. Regarding General Plan Policy N 16.1, Final EIR § 4.3 and Technical Appendix I contain substantial evidence demonstrating that Project-related vibration impacts would be less than significant. Further, FEIR Mitigation Measure MM 4.11-2(A) (FEIR p. 4.11-32) prohibits Project-related construction activities and construction-related night-lighting to occur within 600 feet (the distance of two 100-yard football fields) of occupied sensitive receptors during night-time hours.

RAMV-33 Refer to FEIR §§ 4.3.1.D(2), (3), and (4), the citations noted therein, and FEIR Technical Appendix B1 for substantial evidence demonstrating that air quality in the

South Coast Air Basin has steadily improved since the 1970s. Air quality fluctuates day to day and year to year based on meteorological conditions including but not limited to wind patterns, temperature variations, humidity levels, and other factors. The South Coast Air Quality Management District (SCAQMD) acknowledged at a Mobile Source Committee Meeting held on October 20, 2017, that the 2016 and 2017 summers were characterized by a "very strong, persistent high-pressure ridge aloft and warm temperatures, causing strong temperature inversions and enhanced ozone photochemistry; and, above average surface temperatures occurred through the summer months in the western third of the U.S." In summary, the SCAQMD reported that "[l]ong-term, ozone shows a downward trend, but with marginal increases in 2016 and 2017; year-to-year fluctuations of this magnitude are typical but needs continual assessment" (emphasis added) (SCAQMD, 2018)[6].

RAMV-34 Refer to FEIR Response to Comment B-6 (FEIR p. FEIR-150) and Comment C-23 (FEIR p. FEIR-167) for detailed responses regarding the 191-foot distance measurement shown in the commenter's exhibit and its applicability to analyses contained in the FEIR. Illustrations that show the physical relationship/buffer from the Project site to off-site properties to the south along Redwood Drive are shown in the FEIR following Response to Comment E-91 (FEIR pp. FEIR-216 and 217).

The evidence supporting the FEIR's conclusion that the proposed Project will have a less than significant aesthetic impact, including potential impacts associated with scenic views and lighting, includes but is not limited to a discussion of the Project's design features in FEIR § 3.0, the discussion of potential aesthetic impacts in § 4.1 of the FEIR and the citations noted therein and Responses to Comment Letter C (Comments C-12 through C-16 and C-63; FEIR pp. FEIR-164, 165, and 184), Comment Letter E (Comments E-3, E-47, and E-50; FEIR pp. FEIR-196, 197, 205, and 206), and Comment Letter K (Comment K-32; FEIR pp. FEIR-232).

The evidence supporting the FEIR's conclusion that the proposed Project will have a less than significant noise impact to sensitive receptors located south, southeast, and southwest of the Project site includes but it not limited to a discussion of these potential impacts in FEIR § 4.11, Noise, and the citations noted therein, FEIR Technical Appendix I, Responses to Comment Letter B (Comment B-17; FEIR p. FEIR-158 and 159), Comment Letter C (Comments C-6, C-68 through 87; FEIR pp. FEIR-162, 163, and 186 through 191), Comment Letter E (Comments E-13, E-24, E-25, E-38, E-49, E-51, E-53, and E-68; FEIR pp. FEIR-199, 201, 203, 206, 208, and 211), Comment Letter K (Comments K-8, K-10, K-14, K-15, K-20, K-21, K-29, K-32, K-37, K-42, K-44, K-46, K-48, K-49, K-58, and K-64 (FEIR pp. FEIR-228 through 236), a memorandum prepared by Urban Crossroads dated April 2, 2018 and titled "Knox Business Park Buildings D and E Noise Barrier Memo" that is on file with Riverside County as part of the Project's administrative record, and responses to comment

[6] http://www.aqmd.gov/docs/default-source/default-document-library/msc-oct2017-agenda.pdf

prepared by Urban Crossroads, Inc. and cited in the Final EIR as "Urban Crossroads 2017d" and "Urban Crossroads 2017e."

The evidence supporting the FEIR's conclusion that the proposed Project will have a less than significant impact to human health associated with air pollutant emissions includes but is not limited to the discussion of these impacts in FEIR § 4.3, Air Quality, and the citations noted therein, FEIR Technical Appendices B1 and B2, Responses to Comment Letter B (Comments B-5 through B-12 and B-14 (FEIR pp. FEIR-150 through 157), Comment Letter C (Comments C-5, C-6, C-7, and C-23 through 36; FEIR pp. FEIR-162, 163, and 167 through 177), Comment Letter E (Comments E-71, E-72, E-73, and E-79; FEIR pp. FEIR-211, 212, and 214), Comment Letter G (Comments G-1 through G-12; FEIR pp. FEIR-218 through 22); Comment Letter K (Comments K-19, K-20, K-28, K-29, and K-64; FEIR pp. FEIR-231, 232 and 236); and Comment Letter Q (Comments Q-1 through Q-15; FEIR pp. FEIR-246 through 248), and responses to comment prepared by Urban Crossroads, Inc. and cited in the Final EIR as "Urban Crossroads 2017d."

RAMV-35 The exhibit shown in this comment shows concentrations of air pollutants near freeways. The proposed Project is not a freeway and does not propose to place sensitive receptors near a freeway; therefore, this exhibit has no direct relevance to the Project.

RAMV-36 Refer to FEIR Response to Comment B-6 (FEIR p. FEIR-150) and Comment C-23 (FEIR p. FEIR-167) for detailed responses regarding the 191-foot distance measurement cited in this comment and its applicability to analyses contained in the FEIR. Illustrations that show the physical relationship/buffer from the Project site to off-site properties to the south along Redwood Drive are shown in the FEIR following Response to Comment E-91 (FEIR pp. FEIR-216 and 217).

RAMV-37 The evidence supporting the FEIR's conclusion that the proposed Project will have a less than significant impact to human health associated with air pollutant emissions includes but is not limited to the discussion of these impacts in FEIR § 4.3, Air Quality, and the citations noted therein, FEIR Technical Appendices B1 and B2, Responses to Comment Letter B (Comments B-5 through B-12 and B-14 (FEIR pp. FEIR-150 through 157), Comment Letter C (Comments C-5, C-6, C-7, and C-23 through 36; FEIR pp. FEIR-162, 163, and 167 through 177), Comment Letter E (Comments E-71, E-72, E-73, and E-79; FEIR pp. FEIR-211, 212, and 214), Comment Letter G (Comments G-1 through G-12; FEIR pp. FEIR-218 through 22); Comment Letter K (Comments K-19, K-20, K-28, K-29, and K-64; FEIR pp. FEIR-231, 232 and 236); and Comment Letter Q (Comments Q-1 through Q-15; FEIR pp. FEIR-246 through 248), and responses to comment prepared by Urban Crossroads, Inc. and cited in the Final EIR as "Urban Crossroads 2017d."

RAMV-38 These General Plan polices are noted. Refer to Response to Comment RAMV-37.

RAMV-39 SCAQMD guidance was followed in the preparation of FEIR Technical Appendix B2, which concludes that the proposed Project will have a less-than-significant impact to human health associated with air pollutant emissions. Refer to Response to Comment RAMV-37.

Bullet Point 1 – Refer to Response to Comment RAMV-31.

Bullet Point 2 – Freeway ramps are under the jurisdiction of Caltrans. It is beyond the jurisdictional authority of Riverside County to add off-ramps to freeways. Also, refer to FEIR Response to Comment C-4, E-35, and E-36, which explain the reasonable and foreseeable directional distribution of the Project's truck trips towards I-215 and away from residential streets located south of the Project site. Further, the County has added a condition of approval on the Project that will restrict heavy vehicles, through a weight restriction, from traveling on Decker Road (Ellsworth Street) south of Oleander Avenue. With the addition of this condition, it is reasonably assured that Project-related truck traffic will not travel south using Decker Road (Ellsworth Street). As such, the truck distribution assumptions used in the FEIR's traffic analysis and vehicular-related air quality and noise analyses are supported.

Bullet Point 3 – Riverside County monitors and implements signal synchronization where appropriate.

Bullet Point 4 – Riverside County enforces parking restrictions through its Code Enforcement Division. Further, the County has added a condition of approval on the Project that will restrict heavy vehicles, through a weight restriction, from traveling on Decker Road (Ellsworth Street) south of Oleander Avenue. With the addition of this condition, it is reasonably assured that Project-related truck traffic will not park on Decker Road (Ellsworth Street) or travel on Decker Road (Ellsworth Street).

Bullet Point 5 - Park and ride lots are available throughout the southern California Region, and their use is promoted by the Riverside County Transportation Commission. For a map of available lots, refer to:
http://www.ie511.org/rideshare/park-and-ride.

Bullet Point 6 - Refer to Final EIR Response to Comment C-31(1). As stated in the list of regulatory requirements (at FEIR p. 4.3-36), diesel-fueled vehicles at the Project site are required to comply with the California Air Resources Board (CARB) idling restriction requirements, which currently restrict vehicles from idling for more than 5 minutes. As best practice measures and in an effort to further reduce idling, Mitigation Measures MM 4.3-2(A) and MM 4.3-4 (FEIR p. 4.3-38) are included in the FEIR to require signs to be posted on the site which specify that trucks shall not idle by more than 3 minutes (instead of 5 minutes).

Bullet Point 7 – Refer to the FEIR Responses to Comment for the County's responses to all suggested mitigation measures. Regarding Mitigation Measure 4.3-2, all components of the measure are required by use of the term "shall" except for power

grid connections for small pieces of construction equipment; given the large size of the property and the expected construction phases, it may not be possible to supply the entire site with electric power during the entire duration of the construction process. Regardless, most small pieces of construction equipment such as drills, saws, and compressors, are electric/battery powered and not a substantive, measurable source of air pollutant emissions as compared to larger pieces of equipment such as excavators, bulldozers, forklifts, cranes, etc. that are most typically powered by diesel. Thus, regardless if these small pieces of equipment were electric powered or not, the significance conclusion reached by the FEIR would remain unchanged, and less than significant as shown by FEIR Table 4.3-11, *Emissions Summary of Overall Construction (With Mitigation).* Evidence in the form of calculations and quantitative model outputs is contained in FEIR Technical Appendices B1 and B2 and the appendices thereto.

Bullet Point 8 – The evidence supporting the fact that electric equipment will be used on the Project site where it is feasible to do so, instead of equipment that uses other fuel types, is contained in Mitigation Measures MM 4.3-1(a), 4.3-2, 4.3-8 (FEIR pp 4.3-36 through 4.3-39), FEIR Responses to Comment C-27, C-30 (FEIR p. FEIR 168), C-35(6), C-35(14) (FEIR pp. FEIR 173-176), Response BC-7, ASE-(1), (2), (3), and (4). Further, the Project is required to comply with the California Green Building Standards Code (CALGreen), including all applicable Nonresidential Mandatory Measures, including but not limited to requirements for the installation of energy-efficient features and electric vehicle passenger car charging stations.

Bullet Point 9 - The County is recommending a condition of approval on the Project that prohibits refrigerated warehouse space.

Bullet Point 10 – Auxiliary power unit devices installed on vehicles provide energy for functions other than propulsion (operating the radio, air vents, etc.). Neither the Project Applicant, the Project site's future building user(s), nor the County of Riverside have the authority or ability to control the types of auxiliary power units installed during the auto-making process and used by the trucking industry.

Bullet Point 11 - Refer to FEIR Regulatory Requirement RR-6 (pp. S-16 and S-17), which specifies that the Project's construction activities are required to comply with the mandatory provisions of the South Coast Air Quality Management District (SCAQMD) Rule 1186, which requires the use of a street sweeper certified by the Air Quality Management District.

Bullet Point 12 – All roadway improvements that will be installed by the proposed Project will be paved and all Project-installed roadway shoulders will have curb and gutter. Refer to FEIR § 3.0, Project Description.

Bullet Point 13 - Refer to FEIR Response to Comment C-4, E-35, and E-36, which explain the reasonable and foreseeable directional distribution of the Project's truck

trips towards I-215 and away from residential streets. The provision of on-site amenities will be determined at the building permit stage of Project construction.

Bullet Point 14 - Neither the Project Applicant, the Project site's future building user(s), nor the County of Riverside have the authority or ability to control the type of fuel used by the trucking industry. Refer to Response ASE-4(3) for a detailed response about zero-emission technologies for heavy-duty vehicles. In summary, technology is emerging for both electric-powered and hydrogen fuel cell-powered heavy-duty vehicles, and it is not yet known with any certainty what types of zero-emission heavy-duty vehicles, either electric, hydrogen fuel cell, or other, will be widely available in the future. As acknowledged by the International Council on Clean Transportation (ICCT) in a report titled "Transitioning to Zero-Emission Heavy Duty Freight Vehicles," (ICCT, September 2017)[7], all of the heavy-duty vehicle technologies analyzed by the ICCT world-wide are ". . . in research, exploratory, and in early demonstration phases" (ICCT, p. 33); thus, requiring the Project to make a substantial investment to install electric heavy-duty truck infrastructure on the Project site with no reasonable assurance that this specific technology will actually be the one to emerge into widespread use is not required under CEQA, as mitigation must be feasible. Given that all heavy-duty vehicle technologies are in early research, exploratory, and demonstration phases, there is no assurance that any requirements that may be imposed on the Project by Riverside County related to these zero-emission heavy-duty vehicle technologies have the capability of actually being used.

Bullet Point 15 – The SCAQMD regularly conducts air quality monitoring throughout the South Coast Air Basin. Evidence is provided at www.aqmd.gov.[8]

RAMV-40 Refer to Response to Comment RAMV-31.

RAMV-41 Refer to Response to Comment RAMV-39-Bullet Point 2.

RAMV-42 Refer to Response to Comment RAMV-39-Bullet Point 3.

RAMV-43 Refer to Response to Comment RAMV-39-Bullet Point 4.

RAMV-44 Refer to Response to Comment RAMV-39-Bullet Point 5.

RAMV-45 Refer to Response to Comment RAMV-39-Bullet Point 6.

RAMV-46 Refer to Response to Comment RAMV-39-Bullet Point 7 and Response to Comment ASE-3.

RAMV-47 Refer to Response to Comment RAMV-39-Bullet Point 8.

[7] https://www.theicct.org/sites/default/files/publications/Zero-emission-freight-trucks_ICCT-white-paper_26092017_vF.pdf
[8] http://www.aqmd.gov/home/air-quality/air-quality-studies/air-quality-monitoring-studies

RAMV-48 Refer to Response to Comment RAMV-39-Bullet Point 9.

RAMV-49 Refer to Response to Comment RAMV-39-Bullet Point 10.

RAMV-50 Refer to Response to Comment RAMV-39-Bullet Point 11.

RAMV-51 Refer to Response to Comment RAMV-39-Bullet Point 12.

RAMV-52 Refer to Response to Comment RAMV-39-Bullet Point 13.

RAMV-53 This General Plan policy is noted. Countywide program development is beyond the scope of the proposed Project. Consistent with the policy noted, on a project by project basis and through County initiated updates to the County's General Plan, Riverside County sends notices to applicable environmental groups, surrounding neighbors, and community groups. Through this notification and the public hearing process, the County welcomes and addresses comments and concerns from the public regarding local and regional air quality impacts. Also, Riverside County participates with SCAQMD on specific programs for reducing airborne pollutants in the region, and programs that may be implemented on a County jurisdiction level.

RAMV-54 Refer to Response to Comment RAMV-37.

RAMV-55 These General Plan policies are noted. Refer to Response to Comment RAMV-37.

RAMV-56 Descriptions of PM_{10} and $PM_{2.5}$ and summaries of their related effects to human health are disclosed in FEIR §4.3.1 (FEIR pp. 4.3-4 and 5) and in FEIR Technical Appendix B1.

RAMV-57 Comment is noted regarding Countywide efforts. This comment does not specifically pertain to the proposed Project.

RAMV-58 Refer to Response to Comment RAMV-33.

RAMV-59 Refer to FEIR Response to Comment C-88 (FEIR pp. FEIR-191 and 192). As described in EIR § 3.0, Project Description, the proposed Project accommodates a trail easement along Ellsworth Street and a trail easement along Oleander Avenue to comply with Riverside County's Mead Valley Area Plan Trails and Bikeway System Plan. The County has imposed conditions of approval on the Project to require the Project Applicant to construct and maintain the trail segments on the Project site that will occur on the south side of Oleander Avenue and the east side of Ellsworth Street until the trails are dedicated. A Project condition of approval requires the Project Applicant to offer the trail easements for dedication prior to building permit issuance to the Riverside County Regional Park and Open-Space District or a County-managed Landscape and Lighting Maintenance District for trails purposes. Said easements will be offered on behalf of the vested interest of the citizens of Riverside County.

RAMV-60 This comment is verbatim to FEIR Comment E-25; therefore, refer to FEIR Response to Comment E-25.

RAMV-61 This comment is verbatim to FEIR Comment E-26; therefore, refer to FEIR Response to Comment E-26.

RAMV-62 This comment is verbatim to FEIR Comment E-27; therefore, refer to FEIR Response to Comment E-27.

RAMV-63 This comment is verbatim to FEIR Comment E-28; therefore, refer to FEIR Response to Comment E-28.

RAMV-64 This comment is verbatim to FEIR Comment E-29; therefore, refer to FEIR Response to Comment E-29.

RAMV-65 This comment is verbatim to FEIR Comment E-30; therefore, refer to FEIR Response to Comment E-30.

RAMV-66 This comment is verbatim to FEIR Comment E-31; therefore, refer to FEIR Response to Comment E-31.

RAMV-67 This comment is verbatim to FEIR Comment E-32; therefore, refer to FEIR Response to Comment E-32.

RAMV-68 Since the time the FEIR was published, the Project Applicant has confirmed its intent to avoid the use of a mechanical rock crusher due to success with in-situ rock blasting fragmenting on very nearby projects within the same geologic formation. The in-situ blasting process has been shown to adequately fragment the bedrock into pieces suitable for grading without further crushing. For pieces of anomalous rock fragments and oversize rock that does not fragment into small enough pieces (estimated at <2% of the total rock undergoing this process) those shall be resized using an excavator-mounted breaker or hydraulic jaws (or similar equipment) to crack these pieces of oversize rock. Thus, the particulate air pollutants (including dust and silica dust) that would have been emitted by operation of large mechanical rock crusher will not occur. A letter prepared by Southern California Geotechnical, the geotechnical engineer of record for the proposed Project, dated April 17, 2018, confirms based on their experience working on other construction projects in the local area, and the known and studied subsurface conditions of the Project site, that it is reasonable to expect that blasting without the need for an extensive rock crushing operation may be utilized to successfully accomplish the proposed Project's grading (SoCalGeo, 2018). Further, according to the Project Applicant, approximately 5-feet of soil cover shall be maintained or placed over areas to be blasted to act as a "blanket" keeping the blasted rock in place as is the industry-standard. Soils and rocky areas will be watered down before each blasting event, and routine application of water during grading operations will serve as the primary means of dust control. The presence of moistened soil cover substantially reduces the potential to generate dust (Drake, 2018). Also refer to FEIR Regulatory Requirement RR-4 (FEIR pp. S-15 and 4.3-35), which specifies the mandatory requirement to comply with SCAQMD Rule 403 "Fugitive Dust." Silica is the name given to a group of minerals composed of silicon and oxygen, the two most

abundant elements in the earth's crust, thus it is a component soil and any dust derived from soil in any construction grading project. Compliance with the dust control measures required by SCAQMD Rule 403 (a Condition of Approval (COA) for the project) thus addresses this concern. Among other things, SCAQMD Rule 403 prohibits visible dust beyond the property line, and requires best available control measures including watering of disturbed areas at least three times per day, as well as prohibition of earth-moving and excavation activities when winds exceed 25 mph. Additionally, operations must meet all applicable OSHA requirements including Title 29 Code of Federal Regulation (CFR) requirements where OSHA's "Crystalline Silica Rule: Construction" is present, as well as the California Code of Regulations (CCRs), Title 8, Section 1532.3, Subchapter 4. Construction Safety Orders, Article 4. Dusts, Fumes, Mists, Vapors, and Gases, as applicable. To ensure compliance with these regulations, a grading plan containing a section specific to implementation of dust control measures will be produced and utilized during grading operations and will be made a part of the contract issued for the grading operations. Thus, impacts from silica dust generated during demolition and grading operations will be less than significant. Refer to letter from David Drake, Senior Vice President of Trammell Crow Company to the Riverside County Planning Department dated April 19, 2018 and contained in the County's administrative record for the proposed Project.

RAMV-69 This comment is verbatim to FEIR Comment E-33; therefore, refer to FEIR Response to Comment E-33.

RAMV-70 This comment is verbatim to FEIR Comment E-34; therefore, refer to FEIR Response to Comment E-34.

RAMV-71 This comment is verbatim to FEIR Comment E-3;5 therefore, refer to FEIR Response to Comment E-35.

RAMV-72 This comment is verbatim to FEIR Comment E-36; therefore, refer to FEIR Response to Comment E-36.

RAMV-73 This comment is verbatim to FEIR Comment E-37; therefore, refer to FEIR Response to Comment E-37.

RAMV-74 This comment is similar to FEIR Comment E-38 with an additional statement about an accident at the intersection on March 31, 2018. The County acknowledges the commenter's additional statement. Refer to Response to Comment E-38.

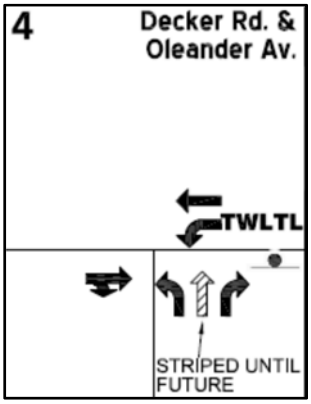
RAMV-75 This comment is similar to FEIR Comment E-39 with an additional statement that the entire Perris Valley can be seen along Markham Street. The County acknowledges the additional statement. The commenter supplied no further evidence contrary to Response to Comment E-39 and the conclusion drawn by the FEIR that the Project would have a less than significant aesthetic impact; therefore, refer to Response to Comment E-39. The evidence supporting the FEIR's conclusion that the proposed Project will have a less than significant aesthetic impact, including potential impacts

associated with scenic views, includes but is not limited to a discussion of the Project's design features in FEIR § 3.0, the discussion of potential aesthetic impacts in § 4.1 of the FEIR and the citations noted therein and Responses to Comment Letter C (Comments C-12 through C-16 and C-63; FEIR pp. FEIR-164, 165, and 184), Comment Letter E (Comments E-3, E-47, and E-50; FEIR pp. FEIR-196, 197, 205, and 206), and Comment Letter K (Comment K-32; FEIR pp. FEIR-232).

RAMV-76 This comment is verbatim to FEIR Comment E-40; therefore, refer to FEIR Response to Comment E-40.

RAMV-77 This comment is similar to FEIR Comment E-41 with the additional statement that Oleander Avenue dead ends at the western boundary of Building E, which is a factual statement. FEIR Response to Comment E-41 (FEIR pp. FEIR-203 and 204) explains that a traffic signal will be needed at the Decker Road (Ellsworth Street) and Oleander Avenue intersection by Year 2035, but a traffic signal is not warranted in the near-term. Based on the Project's applications on file with Riverside County, the following improvements to the Decker Road (Ellsworth Street)/Oleander Avenue intersection will be constructed by the Project, and the intersection will maintain an acceptable level of service in the near-term, as shown in FEIR Table 4.15-16, *Existing plus Project (E+P) Intersection Analysis*, Table 4.15-17, *Opening Year (2017) Intersection Analysis (E+A+P)*, and Table 4.15-18, *Opening Year (2017) plus Cumulative Intersection Analysis (E+A+P=C).* (Level of Service (LOS) A is calculated for the AM and PM peak hours in the near-term).

Project's Proposed Improvements at the Decker Road (Ellsworth Street)/Oleander Avenue Intersection: The full width of Decker Road (Ellsworth Street) and half-width (southern side) of Oleander Avenue will be installed, with asphalt paving, sidewalk, ADA concrete ramps, curb and gutter, signing and striping, and street lighting. At the intersection, northbound Decker Road (Ellsworth Street) will be striped for a right-turn lane, left turn-lane and a future thru-lane that will be cross-striped until the thru-lane is available in the future north of Oleander Avenue. A stop sign will be installed at this location. Oleander Avenue will be striped for an eastbound lane, a westbound lane, and westbound turn lane onto southbound Decker Road (Ellsworth Street) as shown in the diagram below.



Source: FEIR Technical Appendix J1, Exhibit 1-3, Site Adjacent Roadway and Site Access Recommendations

The other intersections noted in this comment are beyond the scope of study for the proposed Project because the Project would contribute fewer than 50 peak hour trips to these intersections, and the County's guide for the preparation of traffic studies requires the study of locations receiving 50 or more peak hour trips. FEIR Subsection 4.15 and FEIR Technical Appendix J1 specify the intersections to which the Project would contribute 50 or more peak hour trips. Also refer to Response RAMV-39 Bullet Point 4. Improvements to the north side of Oleander Avenue are not required as a result of the proposed Project and will likely occur as frontage improvements at the time that the abutting properties located on the north side of Oleander Avenue develop; the timing of such development is unknown and beyond the scope of the proposed Project.

RAMV-78 This comment is verbatim to FEIR Comment E-42; therefore, refer to FEIR Response to Comment E-42.

RAMV-79 This comment is similar to FEIR Comment E-43 with an additional statement regarding Clark Street. Refer to FEIR Response to Comment E-43. Regarding Clark Street, FEIR § 4.15, Technical Appendix J1, and FEIR Responses to Comment C-4, E-35, and E-36 provide substantial evidence about the reasonable and foreseeable directional distribution of the Project's truck trips towards I-215 and away from residential streets located south of the Project site.

RAMV-80 This comment is verbatim to FEIR Comment E-44; therefore, refer to FEIR Response to Comment E-44. The cumulative carcinogenic health risk of cumulative projects, which takes into consideration vehicle idling, is presented in FEIR Table 4.3-10 (FEIR p. 4.3-47). As shown in Table 4.3-10, the Project's maximum impact is 6.19 in one million persons, which is less than the direct and cumulatively considerable impact threshold of 10 in one million. Additional substantial evidence that the Project would not result in a direct or cumulatively considerable health risk associated with air pollutant emissions includes but is not limited to the discussion of these impacts in FEIR § 4.3, Air Quality, and the citations noted therein, FEIR Technical Appendices B1 and B2, Responses to Comment Letter B (Comments B-5 through B-12 and B-14

(FEIR pp. FEIR-150 through 157), Comment Letter C (Comments C-5, C-6, C-7, and C-23 through 36; FEIR pp. FEIR-162, 163, and 167 through 177), Comment Letter E (Comments E-71, E-72, E-73, and E-79; FEIR pp. FEIR-211, 212, and 214), Comment Letter G (Comments G-1 through G-12; FEIR pp. FEIR-218 through 22); Comment Letter K (Comments K-19, K-20, K-28, K-29, and K-64; FEIR pp. FEIR-231, 232 and 236); and Comment Letter Q (Comments Q-1 through Q-15; FEIR pp. FEIR-246 through 248), and responses to comment prepared by Urban Crossroads, Inc. and cited in the Final EIR as "Urban Crossroads 2017d."

RAMV-81 This comment is verbatim to FEIR Comment E-45; therefore, refer to FEIR Response to Comment E-45.

RAMV-82 This comment is similar to FEIR Comment E-46 with an additional statement about Clark, Brown, Alexander, and Wood Roads. Refer to FEIR Response to Comment E-46. Regarding Clark, Brown, Alexander, and Wood Roads, FEIR § 4.15, Technical Appendix J1, and FEIR Responses to Comment C-4, E-35, and E-36 provide substantial evidence about the reasonable and foreseeable directional distribution of the Project's truck trips towards I-215 and away from residential streets located south of the Project site.

RAMV-83 This comment is verbatim to FEIR Comment E-47; therefore, refer to FEIR Response to Comment E-47.

RAMV-84 This comment is verbatim to FEIR Comment E-48; therefore, refer to FEIR Response to Comment E-48.

RAMV-85 This comment is verbatim to FEIR Comment E-49; therefore, refer to FEIR Response to Comment E-49.

RAMV-86 This comment is verbatim to FEIR Comment E-50; therefore, refer to FEIR Response to Comment E-50.

RAMV-87 This comment is verbatim to FEIR Comment E-51; therefore, refer to FEIR Response to Comment E-51.

RAMV-88 This comment is verbatim to FEIR Comment E-52; therefore, refer to FEIR Response to Comment E-52.

RAMV-89 This comment is verbatim to FEIR Comment E-53; therefore, refer to FEIR Response to Comment E-53.

RAMV-90 This comment is similar to FEIR Comment E-54 with an additional reference to the Pechanga Tribe. Refer to FEIR Response to Comment E-54.

RAMV-91 This comment is verbatim to FEIR Comment E-55; therefore, refer to FEIR Response to Comment E-55.

RAMV-92 This comment is verbatim to FEIR Comment E-56; therefore, refer to FEIR Response to Comment E-56.

RAMV-93 This comment is verbatim to FEIR Comment E-57; therefore, refer to FEIR Response to Comment E-57.

RAMV-94 This comment is verbatim to FEIR Comment E-58; therefore, refer to FEIR Response to Comment E-58.

RAMV-95 This comment is verbatim to FEIR Comment E-59; therefore, refer to FEIR Response to Comment E-59.

RAMV-96 This comment is verbatim to FEIR Comment E-60; therefore, refer to FEIR Response to Comment E-60.

RAMV-97 This comment is verbatim to FEIR Comment E-61; therefore, refer to FEIR Response to Comment E-61.

RAMV-98 This comment is verbatim to FEIR Comment E-62; therefore, refer to FEIR Response to Comment E-62.

RAMV-99 This comment is verbatim to FEIR Comment E-63; therefore, refer to FEIR Response to Comment E-63.

RAMV-100 This comment is verbatim to FEIR Comment E-64; therefore, refer to FEIR Response to Comment E-64.

RAMV-101 The evidence supporting the FEIR's conclusion that the Project will have a less-than-significant impact to fire department facilities includes, without limitation, the discussion of these impacts in Subsection 4.13 of the FEIR and the citations noted therein and FEIR Response to Comment C-60.

RAMV-102 This comment is verbatim to FEIR Comment E-65; therefore, refer to FEIR Response to Comment E-65.

RAMV-103 This comment is verbatim to FEIR Comment E-66; therefore, refer to FEIR Response to Comment E-66.

RAMV-104 This comment is verbatim to FEIR Comment E-67; therefore, refer to FEIR Response to Comment E-67.

RAMV-105 This comment is verbatim to FEIR Comment E-68; therefore, refer to FEIR Response to Comment E-68.

RAMV-106 This comment is verbatim to FEIR Comment E-69; therefore, refer to FEIR Response to Comment E-69.

RAMV-107 This comment is verbatim to FEIR Comment E-70; therefore, refer to FEIR Response to Comment E-70.

RAMV-108 This comment is verbatim to FEIR Comment E-71; therefore, refer to FEIR Response to Comment E-71.

RAMV-109 This comment is similar to FEIR Comment E-72, with revisions to the exhibit. Refer to FEIR Response to Comment E-72 and Response to Comment RAMV-80. The exhibit shown in this comment shows concentrations of air pollutants near freeways. The proposed Project is not a freeway and does not propose to place sensitive receptors near a freeway; therefore, this exhibit has no direct relevance to the Project.

RAMV-110 This comment is verbatim to FEIR Comment E-73; therefore, refer to FEIR Response to Comment E-73.

RAMV-111 This comment is verbatim to FEIR Comment E-74; therefore, refer to FEIR Response to Comment E-74.

RAMV-112 This comment is verbatim to FEIR Comment E-75; therefore, refer to FEIR Response to Comment E-75.

RAMV-113 This comment is verbatim to FEIR Comment E-76; therefore, refer to FEIR Response to Comment E-76.

RAMV-114 This comment is verbatim to FEIR Comment E-77; therefore, refer to FEIR Response to Comment E-77.

RAMV-115 This comment is verbatim to FEIR Comment E-78; therefore, refer to FEIR Response to Comment E-78.

RAMV-116 This comment is verbatim to FEIR Comment E-79; therefore, refer to FEIR Response to Comment E-79.

RAMV-117 This comment is verbatim to FEIR Comment E-80; therefore, refer to FEIR Response to Comment E-80.

RAMV-118 This comment is verbatim to FEIR Comment E-81; therefore, refer to FEIR Response to Comment E-81.

RAMV-119 This comment is verbatim to FEIR Comment E-82; therefore, refer to FEIR Response to Comment E-82.

RAMV-120 This comment is verbatim to FEIR Comment E-83; therefore, refer to FEIR Response to Comment E-83.

RAMV-121 This comment is verbatim to FEIR Comment E-84; therefore, refer to FEIR Response to Comment E-84.

RAMV-122 This comment is verbatim to FEIR Comment E-85; therefore, refer to FEIR Response to Comment E-85.

RAMV-123 This comment is verbatim to FEIR Comment E-86; therefore, refer to FEIR Response to Comment E-86.

RAMV-124 This comment is verbatim to FEIR Comment E-87; therefore, refer to FEIR Response to Comment E-87.

RAMV-125 This comment is verbatim to FEIR Comment E-88; therefore, refer to FEIR Response to Comment E-88.

RAMV-126 This comment is verbatim to FEIR Comment E-89; therefore, refer to FEIR Response to Comment E-89.

RAMV-127 This comment is verbatim to FEIR Comment E-90; therefore, refer to FEIR Response to Comment E-90.

RAMV-128 This comment is verbatim to FEIR Comment E-91; therefore, refer to FEIR Response to Comment E-91.