

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

Riverside County General Plan - Chapter 10 - Healthy Communities Elements

Policies:

HC 14.1

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

HC 14.2

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

http://planning.rctlma.org/Portals/0/genplan/general_Plan_2017/elements/OCT17/Ch10_HCE_120815.pdf?ver=2017-10-11-102105-050

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

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

Potential Mitigation Measures

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

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

A. Mobile Source Toxics Analysis

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

In August 2002, the SCAQMD's Mobile Source Committee approved the "Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions." This document provided guidance for analyzing cancer risks from diesel particulate matter from mobile sources at facilities such as truck stops and warehouse distribution centers. Subsequently, SCAQMD staff revised the aforementioned document to expand the analysis to provide technical guidance for analyzing cancer risks from potential diesel particulate emissions impacts from truck idling and movement (such as, but not limited to, truck stops, warehouse and distribution centers, or transit centers), ship hotelling at ports, and train idling. This revised guidance document titled, "Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source

Diesel Idling Emissions for CEQA Air Quality Analysis" was presented to and approved by the SCAQMD's Mobile Source Committee at its March 28, 2003 committee meeting.

Particulate Matter

The Environmental Protection Agency (EPA) defines particulate matter (PM) as either airborne photochemical precipitates or windborne dust. Consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols, common sources of PM are manufacturing and power plants, agriculture, diesel trucks and other vehicles, construction sites, fire and windblown dust. Generally PM settles from atmospheric suspension as either particulate or acid rain and fog that has the potential to damage health, crops, and property. Particulate of 2.5 microns or smaller (2.5 microns is approximately equal to .000098 inches) may stay suspended in the air for longer periods of time and when inhaled can penetrate deep into the lungs. Among the health effects related to PM2.5 are premature death, decreased lung function and exacerbation of asthma and other respiratory tract illnesses.

Airborne particulate matter sized between 2.5 and 10 microns (10 microns is approximately equal to 0.0004 inches), known as PM10 also pose a great risk to human health. PM10 can easily enter the air sacs in the lungs where they may be deposited, resulting in an increased risk of developing cancer, potentially changing lung function and structure, and possibly exacerbating preexisting respiratory and cardiovascular diseases. It can also irritate the eyes, damage sensitive tissues, sometimes carry disease, and may even cause premature death. PM2.5 and PM10 are especially hazardous to the old, young and infirmed.

Control Measures

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

AQ 17.8

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

AQ 17.9

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

AQ 17.10

Promote and encourage the use of natural gas and electric vehicles in distribution centers. (AI 146, 147). Truck goats must be electric instead of diesel.



"The Business Park uses on the west side of Harvill Avenue provide a buffer for residential uses to the west". Zoning to the south of Building "E" is A-1-1 and allows for rural one acre homes. A buffer must be provided for future residents. (<http://planning.rctlma.org/Portals/0/genplan/content/ap1/meadvalley.html>).

Health

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

(Riverside County Vision Statement, Pg. V3)

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

***Mead Valley Area Plan
Industrial Development***

Given the proximity of the rural community and residential uses, the impacts of industrial expansion on localized air quality, traffic, noise, light and glare need to be assessed in order to apply appropriate measures to mitigate impacts so that the environmental quality of the community and residents' health and welfare are maintained (Mead Valley Area Plan, pg. 36).

Policies:

Fifth.

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

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

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

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

Certainly this is not adequate as residents will not have access to the Project site once construction is under way. Residents will not be aware of any signage or posting on the construction site and 24 hours is not enough notice to take measures to safeguard their property and livestock. Residents surrounding this project site must be notified in person, written notice or with a notice attached to the property gate as to the date and time that blasting will occur at least 72 hours prior to blasting. The EIR fails to take into account that this a rural neighborhood where many residents have large livestock and other animals that may become frightened from the noise and vibrations of these blasts. Residents have the right to protect their property (including livestock) from injury and

damage.

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

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

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

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

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

OSHA- CONTROL OF SILICA DUST IN CONSTRUCTION

Crushing Machines

Using crushing machines at construction sites to reduce the size of large rocks, concrete, or construction rubble can generate respirable crystalline silica dust. When inhaled, the small particles of silica can irreversibly damage the lungs. This fact sheet describes dust controls that can be used to minimize the amount of airborne dust when using crushing machines as listed in Table 1 of the Respirable Crystalline Silica Standard for Construction. 29 CFR 1926.1153

Sixth.

Truck and vehicle traffic is not adequately addressed in the EIR. Two main entrances along Oleander are indicated on Building "D" & "E" Site Plans. These plans also indicate two distinct offices with one at the northwest and one at the northeast corners of

Building "D" & "E" This indicates that buildings "E" and "D" will have more than one tenant. Trammel Crow Knox Business Park Building at 17789 Harvill Ave. has several tenants, which is creating enormous traffic, health and safety concerns with 30 or more diesel trucks lined up outside of the entrance to the facility. These logistics trucks are lined up along Harvill Ave. idling for hours, blocking the right lane of the road and left turn lane onto Harvill from Harley Knox.

Logistics trucks from these warehouses must not be allowed to use our dangerous narrow rural roads. Signage is not enough to prevent logistics trucks from this warehouse from using Decker Road. Decker Road must be closed to through traffic past the Project's southern boundary line. Closure of Decker Road must include barriers that prevent logistics trucks from accessing Decker Road past the southern boundary line of Building "D". This will allow EMWD to continue to access the road to the water tank.

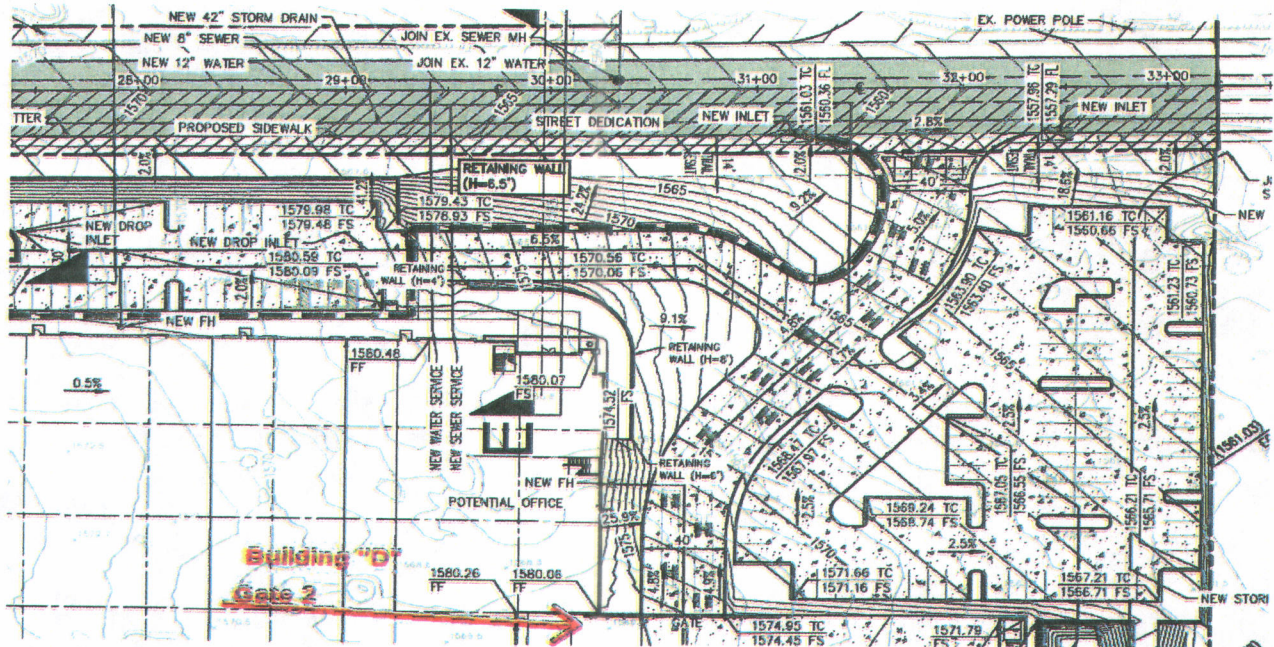


Harvill Ave. with trucks lined up to enter the warehouse at 17789 Harvill Ave.

Harvill Ave. with trucks parked in the right lane and cars having to move over to the left lane.

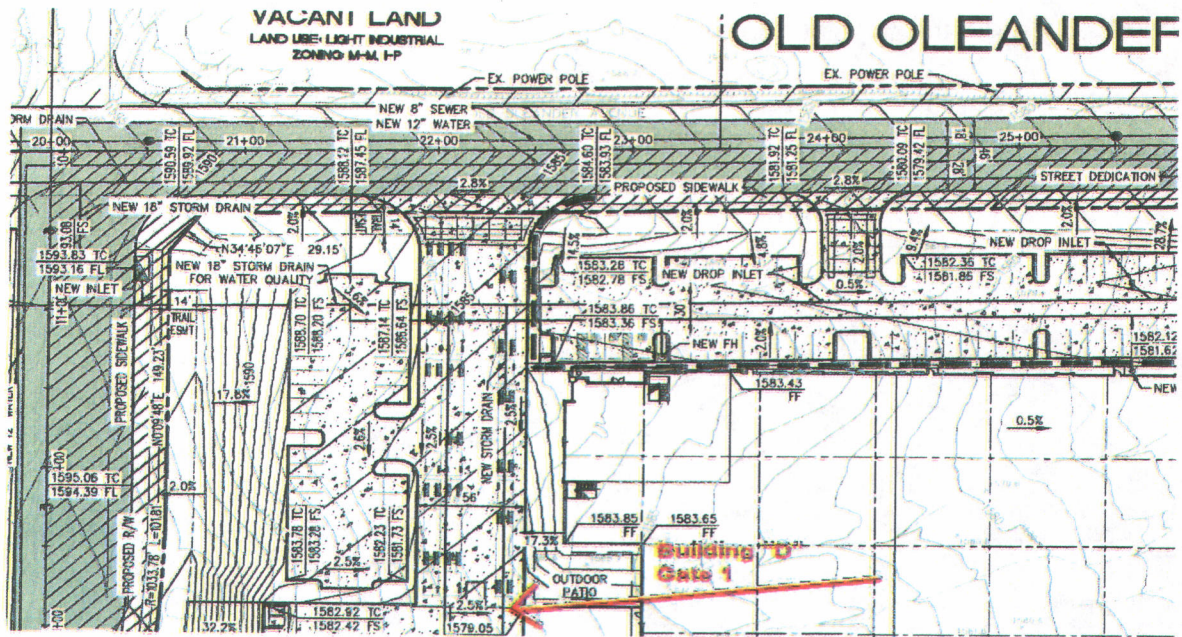
Harvill Ave was never built to County standards and is not wide enough for trucks to park along the side of the road and allow other vehicles to drive in the right lane. Harvill

Ave. is the main thoroughfare for thousands of trucks that will be accessing Building "E" and "D", current and future high cube logistics warehouses. Traffic studies for this project have not adequately addressed the number of trucks from these warehouses, impacts from these trucks, routes that these trucks will take to access the ports of LA and Long Beach, the health and safety of local residents who will be driving not only Harvill Ave, but numerous other roads that trucks from these warehouses will be using throughout the region.



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

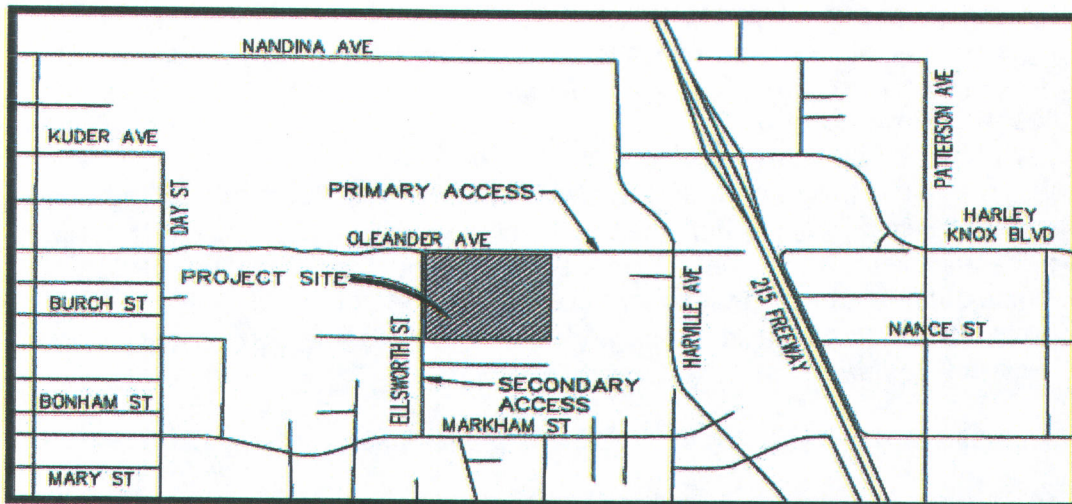
Having two gates and two separate offices one at the east side of the building and one on the west side of the building indicates that Building "D" and "E" are set up for two tenants per warehouse. This is not addressed in the EIR. Traffic studies, air quality studies, noise studies, health and safety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



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

Seventh.

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



VICINITY MAP
N.T.S.

The site plan indicates that Old Oleander will be the Primary Access and Ellsworth / Decker will be the secondary access for trucks coming into and leaving Building D and E.

This has not been evaluated in the EIR as there are a host of very serious concerns using Ellsworth / Decker Road south of the project for any logistic truck access or any type of vehicle traffic or activity.

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

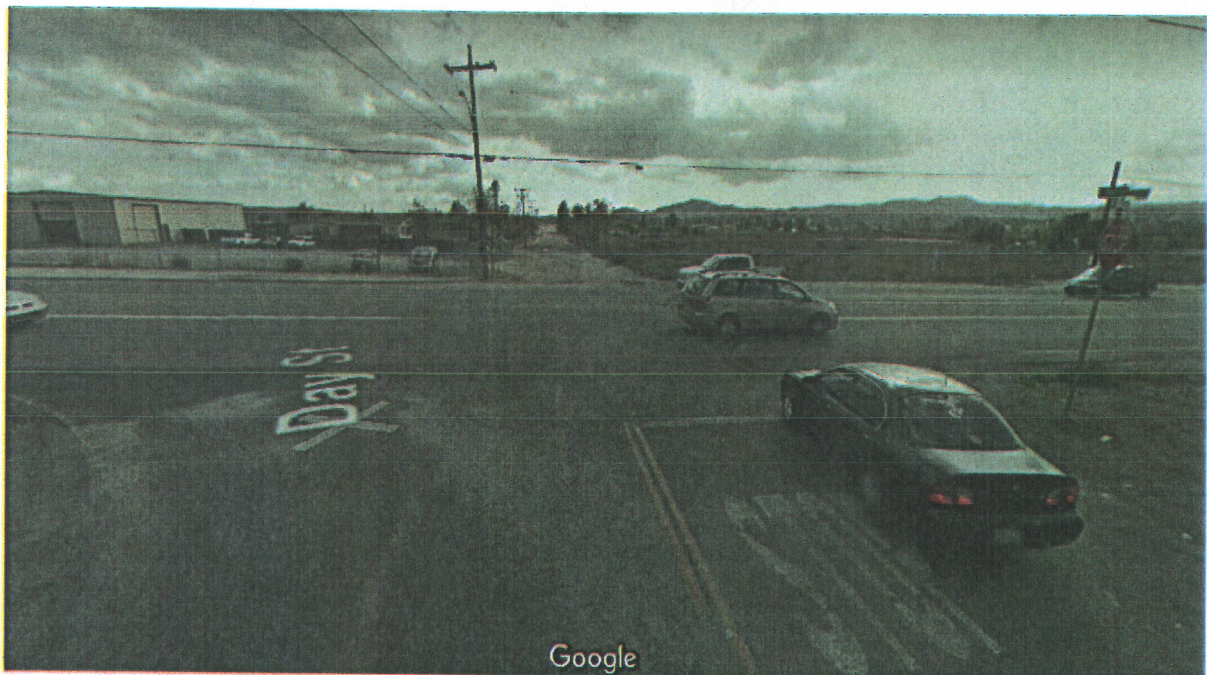


Ellsworth / Decker Street at Markham looking west. No stop sign or street sign. Just had an accident at this intersection on March 31, 2018.

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



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



Day Street at Cajalco

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

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

Eighth.

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

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

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

Ninth.

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

that will be using the I-215 Freeway. Harley Knox off-ramp is already backed up onto the I-215 much of the day.



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

Tenth

E3.0 PROJECT DESCRIPTION

1. Earthwork and Grading

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

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

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

Eleventh

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

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



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

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

Project site per day during the blasting and rock crushing phase of construction (approximately 65 working days) (Urban Crossroads, Inc, 2016a, pp. 31-32). Rock Blasting would also need to take place on the lot for Building "E".

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

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

Twelfth

3.5 OPERATIONAL CHARACTERISTICS

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

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

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

condition of approval (Knox Business Park Bldgs D and E EIR-4, page S-18). Signs need to be installed before occupancy. Signs need to be posted along the outside perimeter of the warehouses, "idling restricted to 5 minutes".

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

Thirteenth.

Jobs.

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

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

The EIR does not address the true estimates of jobs being created by this Project. A true estimate is difficult to predict, but it is a fact that within the next few years and very possibly by the time that these warehouses are built, the automation and robotic technology will have eliminated a large portion of the 1,081 jobs estimated to occur. It is hard to know if trucks will be driverless, but certainly the workers within the facilities will be very limited in numbers. The EIR for this project is extremely flawed in the assumption that over 1,000 jobs will be created.

II. "Envision a self-guided forklift streaming down a narrow aisle, feeding inventory into a rack system towering 40 feet above the warehouse floor, while an auto-guided mini-robot transports outbound inventory to fulfillment stations lit up like holiday lights, enabling order processing of up to 2,400 picks per hour. As the perfect order is complete, a high-speed conveyor shuttles packages toward a stationary robot, which

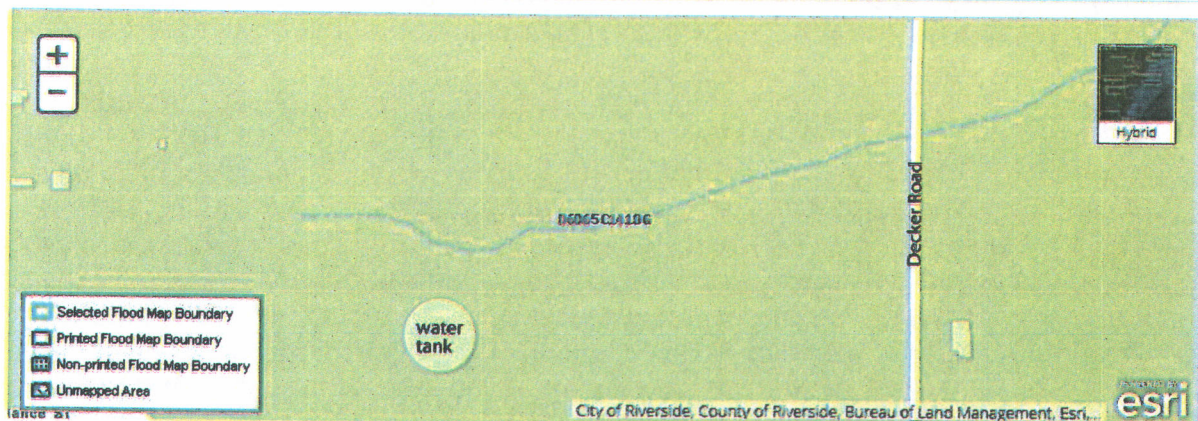
loads the contents into a driverless tractor-trailer. Could this be a look into the warehouse of the 22nd century? Nope, it's the modern distribution center of today" (Warehouse Automation: The Next Generation by Charlie Fiveash, January 27, 2016, Inbound Logistics).

Fourteenth.

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

FEMA Flood Map Service Center : Search By Address

Locator Map



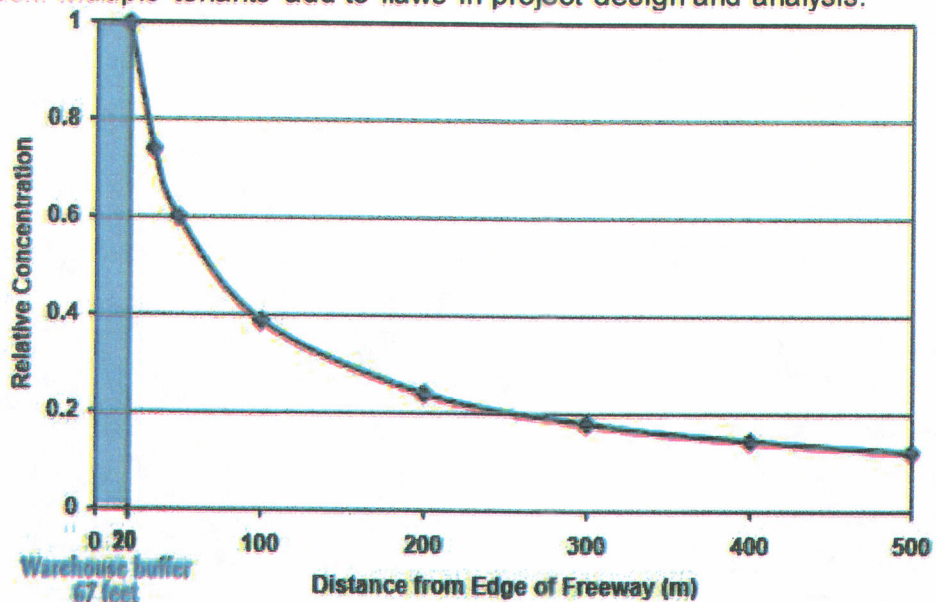
Riverside County Flood Map clearly shows a blue line stream traversing across the entire Project site. The blue line stream is part of the wetlands to the west of the project site. All of this is subject to "waters of the United States" are therefore generally subject to federal environmental regulations.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

Fifteenth.

The EIR does not include the WRCOG and SCAQMD good neighbor policy that sets a 1000 foot buffer between sensitive receptors and distribution warehouses. The current proposal for Building "D" has the warehouse project directly next to homes. No setback or buffer as trucks will be traveling from the east side of the warehouse to the west side of the warehouse using a driveway just a few feet from rural property lines. Small walls along the parking spaces will not prevent air pollution or noise from back up beepers, the hazards and dangers of noise pollution, air pollution, vibration and light trespass 24-

7. Trucks are able to park outside of the parking stalls along the southern driveway as is occurring right now at the logistics warehouse at Harvill Ave. and Oleander. (WRCOG Good Neighbor Policy Guidelines for Siting Warehouse/ Distribution Facilities). [Good Neighbor Guidelines for Siting Warehouse/Distribution Facilities](#).

Warehouse at Oleander X Harvill has numerous trucks parked outside of the parking stalls along the north side of the building. Trucks are idling along this area, unloading, back up beepers going off day and night. GPA 1151 & 1152 proposed project has this same style of driveway along the south of Building "D" directly adjacent to rural homes. The EIR does not address parking issues such as this, trucks backed up onto local roads idling for hours as they arrive to unload their goods. Trucks parked in the middle of the road as Harvill was not designed for trucks to park on the shoulder. These same conditions exist for Building "D" and "E" with trucks having to turn left to enter the buildings and limited truck queuing space at the warehouse entrance behind the guard shack. Multiple tenants add to flaws in project design and analysis.



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

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

Sixteenth

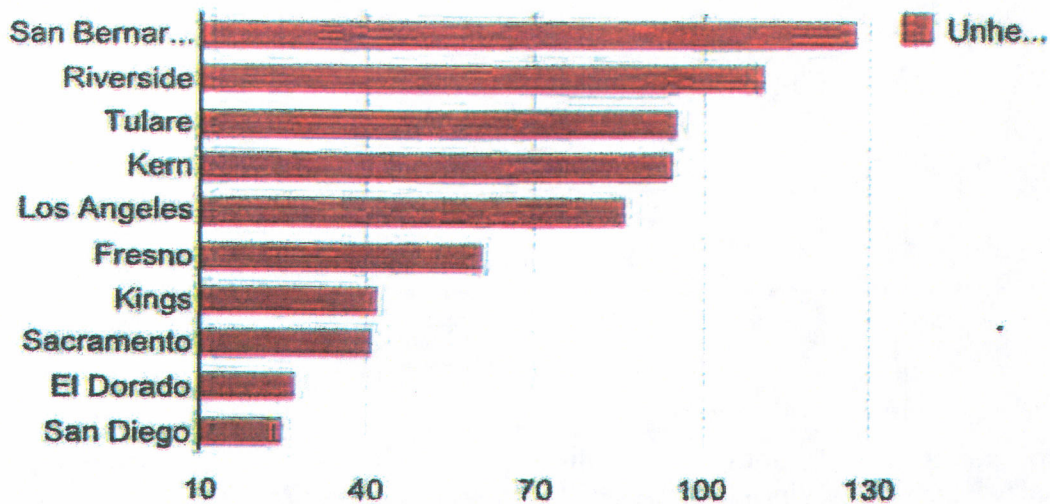
Article from SCAG.

What is Environmental Justice?

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

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

Most ozone polluted counties in the U.S.



Source: American Lung Association

Seventeenth.

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

Riverside County Vision

The simplest way to summarize our vision for Riverside County is to say that:
"Riverside County is a family of special communities in a remarkable environmental setting."

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

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

http://planning.rctlma.org/Portals/0/genplan/general_plan_2013/1%20General%20Plan/Chapter%203-Land%20Use%20Element%20Adopted-Final%20Clean.pdf

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

northeast corners of Building "D" & "E" This indicates that buildings "E" and "D" will have more than one tenant. Impacts from multiple tenants are not addressed in the EIR. Similar warehouse at 17789 Harvill owned by Trammel Crow has multiple tenants which is creating a number of serious violations of CEQA and CARB. Trucks idling for hours as they are queuing to enter the facility. Lining up in the roadway of Harvill Ave. blocking traffic. Idling within the facility for hours. Parking in unauthorized areas because truck trailer parking is full.

- Ellsworth Street / Decker Road is set as the secondary access for Building "E" and "D". EIR fails to adequately evaluate and disclose project impacts from allowing truck access past the improved sections of Ellsworth / Decker Road. This is an unimproved dirt road with pot holes, speed bumps and uneven surfaces that is certainly not up to any standards that would meet CEQA or AQMD guidelines for noise, dust, vibration and air quality.

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

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

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

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

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

Conclusion

I urge the Board of Supervisors to vote NO on EIR 546 which is fatally flawed and must be substantially revised and recirculated to correct numerous and significant flaws, errors and omissions much of which are included in this letter. Additional mitigation measures will need to be included into any future Environmental Impact Reports regarding GPA 1151 & GPA 1152.

The Rural Association of Mead Valley is totally opposed to this proposed project of General Plan Amendments GPA 1151 & 1152 and opposed to zone changes from Business Park land use to Industrial Park so that two massive logistics warehouse can be built directly next to homes in the middle of our rural community. This project will create massive truck congestion, air pollution, noise pollution and additional dangers on

our local rural roads

Sincerely,

A handwritten signature in blue ink that reads "Debbie Walsh". The signature is written in a cursive style with a long horizontal flourish at the end.

Debbie Walsh
President, Rural Association of Mead Valley

From: [Ray/Peggy](#)
To: [Supervisor Jeffries - 1st District](#); [Ketcham, Thomas](#); [Brady, Russell](#); [COB](#)
Subject: Opposing Gpa 1151 and GPA 1152 Please make this a matter of record for the May 22, 2018 meeting
Date: Monday, May 21, 2018 10:46:01 PM

22075 Nance St
Perris, CA 92570

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

May 21, 2018

Re: Item 18.1 - Opposition to GPA1151 and GPA 1152 and Zone changes 7873 and 7872

Final Environmental Impact Report No. 546

Dear Honorable Supervisors:

We are neighbors to this massive project and we are opposing the rezoning and building of these massive warehouses in the area of rural homes. In the area up for rezoning and the building of these warehouses we can see egrets, burrowing owls and the white owls in the area. There are other flying fowl. We see hawks and turkey buzzards and other smaller birds all year long. There are floral and fauna that flourish at some times of the year.

Our view has already been affected by the current warehouses that have been built. We built our forever home here to enjoy the open space and the view. We made our home here for the quietness and tranquility of being rural. We have already been impacted by the warehouses that have been built close to Harvill and Nandina Avenues. Not only is our view impacted but there is noise with the peeping of the trucks 24/7. This is most disturbing at night. All the light coming from these current warehouses effects our peaceful evenings. We can't imagine how much worse this noise and light pollution will be if these two warehouses are approved.

We oppose it because of the heath issues caused by all of the pollutants in the air caused by the trucks. Trucks idling for hours will put much more toxic pollution in the air, in our area, beyond what the EIR 546 study says in the report. It makes our asthma worse and we are sick more often. Ray has a disease and has been having treatment and we want to spend more time on our porch enjoying our rural ilife style. It will become more difficult for him to spend much time outside without it being more damaging to his health. A really big concern for us is for the young ones. We have our great grand children that visit and they will be breathing the bad air caused by all the trucks on the road and idling polluting the air. Our great grand children's health will be adversely affected if these warehouses, so close to our home, is built.

There is a blind curve on Markham and there are a few trucks already traveling this road very slowly. Traffic is very heavy at times. It will be so much more dangerous, on this winding road, with people trying to pass these very long, slow moving trucks. Harvill has already become a danger and a traffic hazard with trucks idling and making dangerous U-turns.

Our safety and health and our great grandchildren's safety and health and our visitor's safety and health will be adversely affected if these warehouses are built. Please vote to stop these warehouses from being built in our beautiful tranquil rural neighborhood. Thank you for this consideration.

Sincerely,

C. Ray Miller
Peggy A. Miller
H 951-943-1211
C 951-333-7171

RAMV.ORG
PO Box 2433
Perris, CA 92572
abilene149@gmail.com

May 22, 2018

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

Dear Honorable Supervisors:

Re: Item 18.1 - Opposition to GPA 1151 & 1152 & zone changes 7873 & 7872 - Final Environmental Impact Report No. 546 for proposed Knox Business Park Buildings D and E

Request Item 18.1 be reopened for public comment.

Request for continuance was based on the Proposed Approvals being Uncertain, Incomplete and/or Inconsistent with Project.

Residents are unable to comment on the CEQA Findings of Fact and Statement of Overriding Considerations because these are not included within the Staff Report/Board Submittal. Even if, arguably, these are not required to be disclosed in advance, the public cannot comment on them when they are not part of the Agenda Package/Board Submittal.

Developer failed to repost the required "Posting of Public Notices for Development Projects Requiring Change of Land Use" with the correct date of the public hearing. **Signs are currently posted with May 1, 2018 date. Meeting date May 22, 2018.** This is a violation of TLMA requirements for on-site postings of notices of public hearings for development applications within a proposed project's boundaries whenever a change in land use is proposed.

<http://planning.rctlma.org/Portals/0/DevelopmentProcess/Posting%20Requirements/03-02%20posting%20requirements.pdf>

5/22/18 18.1
2018-5-139712



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

Environmental Justice. Mead Valley qualifies as an underrepresented and poor community under Title VI of the Civil Rights Act of 1964 (Title VI) with 72% of the residents of Mead Valley being Hispanic or Latino and over 43% of Mead Valley residents living below the poverty level according to the 2010 Census. The EIR does not address Environmental Justice and the impacts on Mead Valley as a minority community. There are numerous warehouses currently in the pipeline and many that are vacant. Do we really need more warehouses? Can the area take on over 800 more truck trips per day on Cajalco Road., Markham, Decker and Day streets that pass by our schools? Do we need warehouses just feet from minority resident's homes where children and the elderly live?

Are we trading the health, safety and welfare of this poor Hispanic rural community for the chance that there will be jobs once these two warehouses are built in 2020? It is a roll of the dice and our lives are at risk. Trucks increasing severe hazards on our roads, air pollution destroying our health, noise affecting our mental well-being and hearing.

- **DEIR Air Quality analysis is not accurate.** The developers of the warehouse at 17789 Harvill frequently have trucks lined up along Harvill Ave. idling for up to an hour. The warehouse is using diesel powered truck goats and must fill up at the truck stop at Harvill X Cajalco. These truck goats are running 24-7 and adding tons of toxic pollution into the air and yet were not included in the EIR air pollution study model. These truck goats were observed on Harvill without California license plates. Are they California compliant? What will be used at the warehouses at Decker X Oleander? The poorly planned truck access into the 2 proposed warehouse facilities at Decker X Oleander will result in similar conditions as exist in the present warehouse at 17789 Harvill.

The Harvill warehouse facility is allowing trucks in the bays and parking areas to idle their trucks for hours and yet CARB allows only 5 minutes idling time. Idling trucks are less fuel efficient and produce tons of additional pollution. Can we believe this developer when he is stating he will agree to a 3 minute idle time when he is not honoring his 5 minute idle time limit required by CARB at his other warehouses. The increased idle time has led to greater discrepancies in the EIR air quality NOX and VOC numbers which may well be up to 10 times higher than is being reported in the DEIR which is well beyond the acceptable limit.

- **Thirty-five foot buffer between homes (sensitive receptors) and the property line of the warehouse. The developer has stated the buffer is between the warehouse wall and the homes, not the property line between the warehouse and rural parcels.** "Buffer Zone: An area of land separating one parcel or land from another that acts to soften or mitigate the effects of one land use on the other." WRCOG Good Neighbor Guidelines – Just 35 feet of vegetation from the property line of rural zoned property to the warehouse driving and parking areas along the south boundaries. CARB, SCAQMD and WRCOG buffer measurement from property line to the warehouse. This is not sufficient as residents do use their entire property. Using full sized trees in the presentation that appear to be 60 feet tall is deceptive making it seem as though there is more of a buffer between homes and the warehouse than actually exists.
- **Secondary Access (Decker Road) will allow over 800 truck trips per day on Decker Road which leads to Markham** – Traffic signs do not deter truck drivers from using certain streets. The warehouse at 17789 Harvill has signage required in the COA and EIR directing trucks to use Harley Knox, but in fact many trucks are using Cajalco Road to the I-15 as their preferred route as it is much shorter and faster. Also signage not to idle for more than 5 minutes, but they are idling for long periods of time. For truck drivers time is money. As more warehouses become operational throughout the area, Cajalco Road will become gridlocked. The I-215 Freeway is already backed up to Nuevo Road during peak hours most of the day.
- Markham Street is used by hundreds of parents as they take their children to school each day. Adding over 800 truck trips per day on this already overburdened two lane country road that is already known for deadly accidents because of the steep winding grade to Day Street will result in more deadly accidents. Every day we observe a number of logistics trucks already using Markham up that grade.

- Trucks will be using our streets and vacant parcels to park their trucks attracting prostitutes, more crime, urinating in public and leaving their trash. Trucks are idling for hours as they sleep in their rigs or eat their meals surrounding the Harvill warehouse.
- HES incorrectly determined that the Project site contains no wetlands or vernal pools as defined by the 1987 Corps of Engineers Wetland Delineation Manual. Therefore, no vernal pool or fairy shrimp Focused Survey Report were ever performed or included in FEIR or DEIR 485 as required by CEQA. The Oleander Business Park EIR 485 contains reports for Fairy Shrimp and Vernal Pool studies as they exist nearby. 17789 Harvill warehouse is part of the Oleander Business Park.

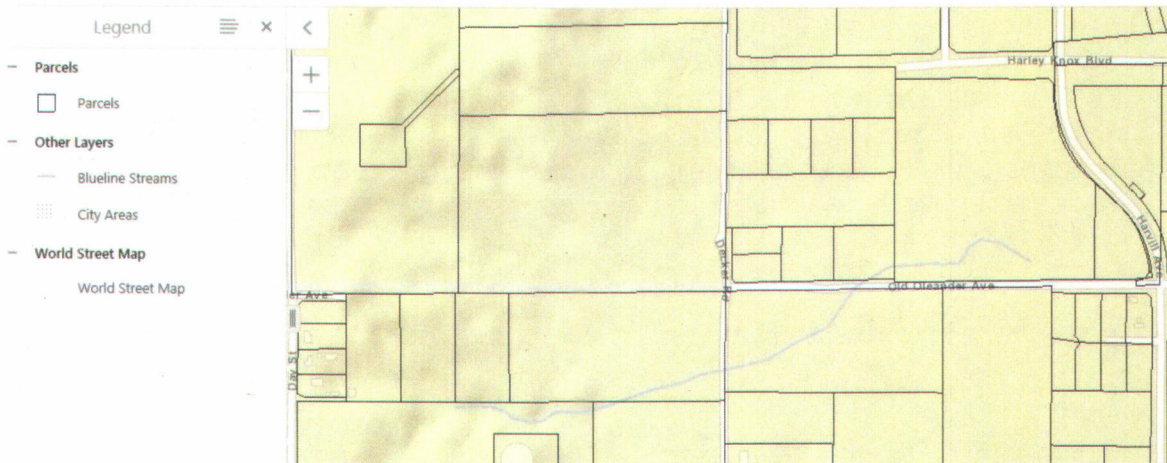
2.4.2 MULTIPLE SPECIES HABITAT CONSERVATION PLAN

"The MSHCP is a comprehensive, multi-jurisdictional Habitat Conservation Plan (HCP) focusing on conservation of species and their associated habitats in Western Riverside County. Riverside County approved the MSHCP on June 17, 2003. An Implementation Agreement (IA) between the US Fish and Wildlife Service (USFWS), the California Department of Fish and Game (CDFG), and the County of Riverside was executed and associated 10(a)(1)(B) Permit No. TE-088609 was issued on June 22, 2004. As shown on Figure 2-4, *MSHCP Plan Map*, TPM No. 33942 is not located within the MSHCP Criteria Area. However, the Project is still subject to review for consistency with the MSHCP's Protection of Species Associated with Riparian/Riverine Areas and Vernal Pool Guidelines, the Protection of Narrow Endemic Plant Species guidelines, and the Additional Survey Needs and Procedures. Surveys required under the MSHCP for the Project site include focused surveys for burrowing owl."

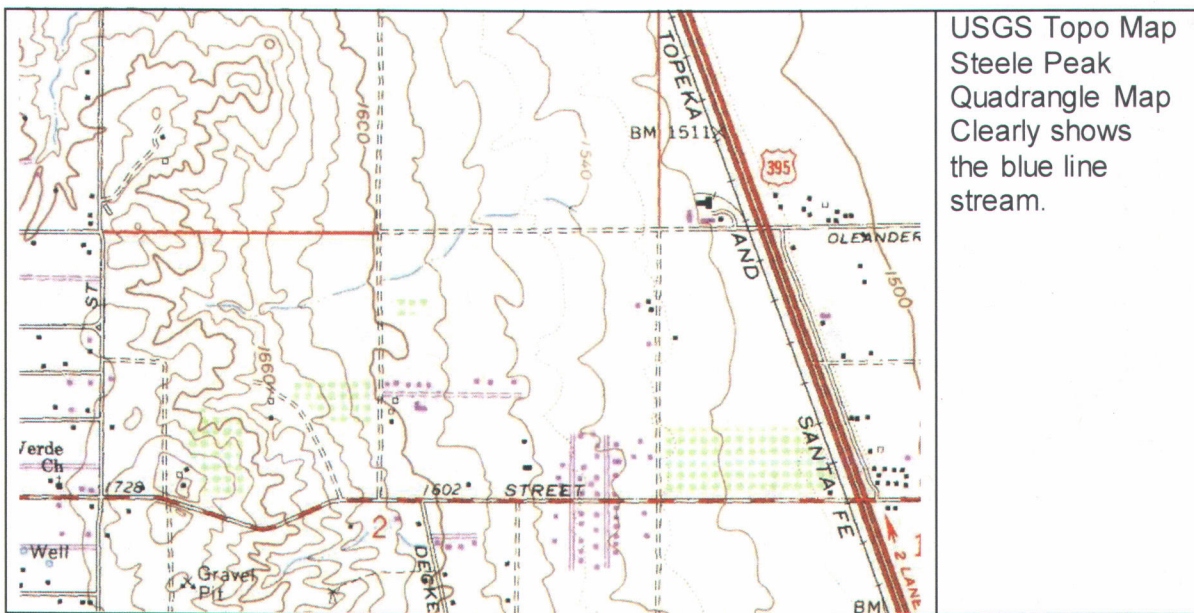
HES inaccurately concluded that Building D Site and the Building E site contain no "Waters of the United States" under federal jurisdiction and no "Waters of the State" under California Department of Fish and Wildlife jurisdiction. According to the (USGS), any stream shown as a solid or broken blue line on 7.5 Minute Series quadrangle maps prepared by the U.S. Department of the Interior Geological Survey (USGS). A blue line stream may be any creek, stream or other flowing water feature, perennial or ephemeral, indicated on USGS quadrangle maps, with the exception of man-made watercourses. The United States Army Corps of Engineers uses USGS blue line stream markings as a preliminary indicator of "Waters of the United States". Streams identified on USGS maps in such a manner are therefore generally subject to federal environmental regulations" (FEIR 485 Oleander Business Park, Page 93).

Blue Line Stream listed on (USGS) maps are located on both Building "E" and "D" sites.

<http://www.floodcontrol.co.riverside.ca.us/GlossaryTerms.aspx>.



Riverside County GIS Flood Mapping clearly shows the blue line stream starting in the arroyo east of Day street and continuing across parcels that include Building "E" and "D".



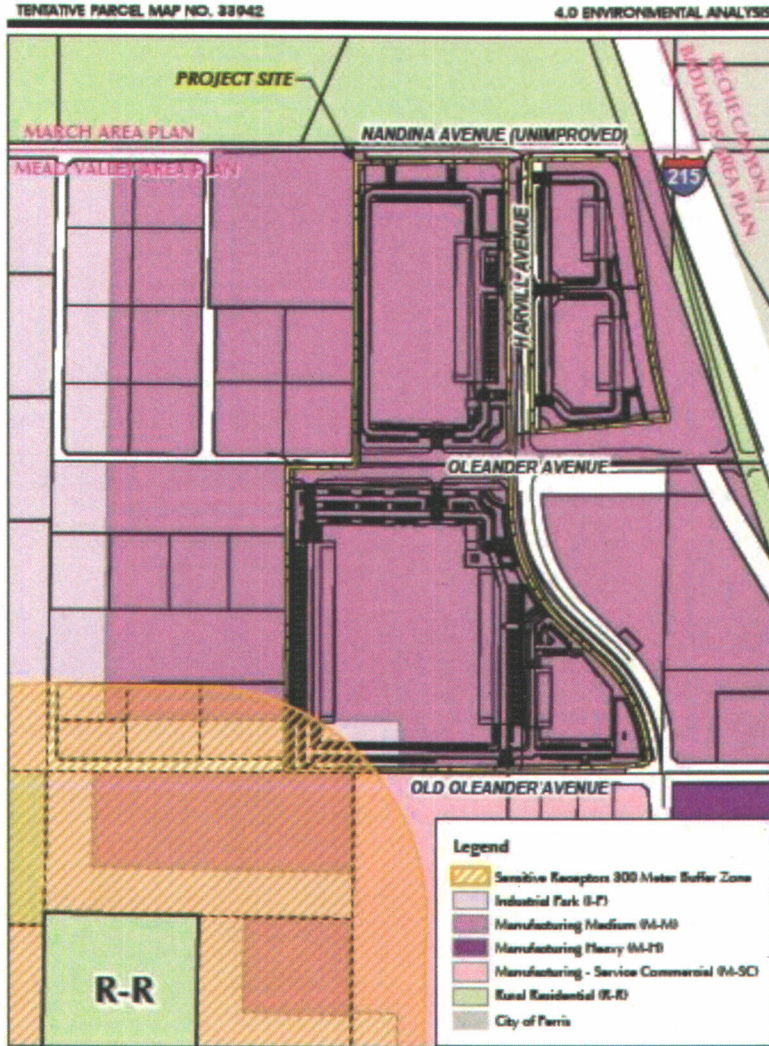
USGS Topo Map Steele Peak Quadrangle Map Clearly shows the blue line stream.

Sensitive Receptors (Rural Residential) properties with homes.

"The potential for sensitive receptors to be affected is primarily a concern to the south of the project site, where residential uses are currently located". (EIR 485, pg. 4-65)

"The SCAQMD recommends a buffer distance of 300 meters between distribution /warehouse facilities and sensitive receptors. The closest existing sensitive receptor is a residential parcel located 225 meters to the southwest of the project site that is zoned Rural Residential. No other existing sensitive receptors are located within 300 meters of the project site. Some areas to the north and southwest are zoned for rural residential, but are designated under the General Plan for public facilities and business park, respectively; therefore, it is unlikely that sensitive receptors would be located on these

parcels to the north and southwest. It should be noted that the Project is bound by the I-215 freeway to the east and beyond that, the General Plan designations are light industrial. Land uses to the south and west are designated as Business Park under the General Plan. Based on the proximity of an existing sensitive residential receptor within 300 meters of the Project site's southern boundaries, the Project would contribute to adverse health effects associated with diesel particulate emissions concentrations (see Figure 4-14, *Sensitive Receptor 300 Meter Buffer Zone*)." (EIR 485, pg. 4-65)



Source: ©General Plan, 2005



FIGURE 4-14

Sensitive Receptors 300 Meter Buffer Zone



At the warehouse at 17789 Harvill Ave. owned by this same developer there are a number of serious issues of concern that are not being addressed: Trucks lined up along Harvill Ave. to Harley Knox Blvd as they wait to enter the warehouse facility. Trucks coming from the I-15 and La Sierra area using Cajalco Road to Harvill and going north to this same warehouse. Trucks are unable to enter the warehouse facility using the center right/left turn lane because it is blocked with truck traffic and therefore trucks go from the center median to the far right lane and make an illegal U-turn to get into line. All of these trucks are idling for 45 minutes or more. There were a few near misses as cars are traveling 50+ around a blind curve and cannot possibly see a 53' logistics truck as these trucks turn and block the entire road. Pictures taken Monday, May 14, 2018 between 10:00- 11:45am.



Truck coming from Cajalco making a U-turn into line



Another truck making a U-turn

What is at stake here. Our quality of life, safety, health and rural lifestyle. The entire area is also affected as this project is set to add over 800 truck trips per day onto our already congested roads and freeways.

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

requirements and consistent with the areas analyzed in the project's EIR. The revisions to secondary access would require improvements.

(24' width of pavement) to Decker Road south of the project site to Markham Street. Due to concerns from the nearby residents that improvements to this section of Decker Road could allow for truck traffic to pass by to connect to Markham Street despite what mitigation measures are included in the EIR for truck traffic to be directed on Oleander, these improvements are understood to not be desirable from the nearby residents (or the applicant or staff) and is a result of a requirement of Ordinance No. 460. This condition is recommended for incorporation with consideration of the Tentative Parcel Maps due to its requirement per Ordinance No. 460, but discussion is anticipated regarding this requirement and whether the applications for the Tentative Parcel Maps may be set aside to remove the requirement for improvements to Ellsworth Street south of the project site to Markham Street." (Memorandum, Planning Department April 2, 2018).

See Parcel Map for Building "E" that includes avoidance area, easement to access EMWD water reservoir, lot line adjustment, required by Ord. 460. Standard road with is 32' and is now being changed to 24' will that be wide enough for trucks to make a U-turn?

PM36950

50. Transportation.7 – Off-Site Access 2

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

Said off-site access road shall be the **southerly** extension of Decker Road (Ellsworth Street) to **Markham Street** and the easterly extension of Harley Knox Boulevard to a paved County maintained Harley Knox Boulevard **or as approved by the Director of Transportation.**"

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

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

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

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

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

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

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



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

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

3. Conditions of Approval regarding secondary access (Decker / Ellsworth Street). Residents do not want 800 truck trips per day going down Decker Road in front of their

homes, whether the county is required to pave Decker or not these trucks will use Decker Road.

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

Good Neighbor Guidelines For Siting New and/or Modified Warehouse/Distribution Facilities

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

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

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

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

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

Goal 2:

Eliminate diesel trucks from unnecessarily traversing through residential neighborhoods.

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

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

The staff report states trucks will not use Decker Road, but it is required by Transportation as a secondary access. The County feels that weight limit signs will

prevent these trucks from taking the shortest and fastest route to the I-91. Truck drivers know that the CHP must cite drivers and therefore they can ignore these signs.

Goal 3. Eliminate trucks from using residential areas and repairing vehicles on the streets. Trucks are still parked along residential streets in Mead Valley. Who will cite them? We do not have enough Code Enforcement officers to take care of that task. Decker will become a truck parking area. Dirt fields will become truck parking lots as is currently seen on Oleander X Harvill south of warehouse at Harvill. No restrooms and attracting prostitutes into our area 24-7. Trucks idling for hours as the drivers sleep creating more pollution.

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

Benefits:

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

Recommended Guidelines:

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

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

Developer refuses to install electric hook-ups to prevent excessive idling and also refuses to put in adequate buffering between rural homes and this warehouse.

Residents will be living 35' from a massive warehouse with over 800 truck trips per day. WRCOG good neighbor policy highly recommends a 1,000 foot buffer from the property line. Claims by the developer that there is a 191' buffer are not accurate as the measurement the developer is using is from the warehouse building to the first house. Not from the property line to the warehouse.

Goal 5:

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

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

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

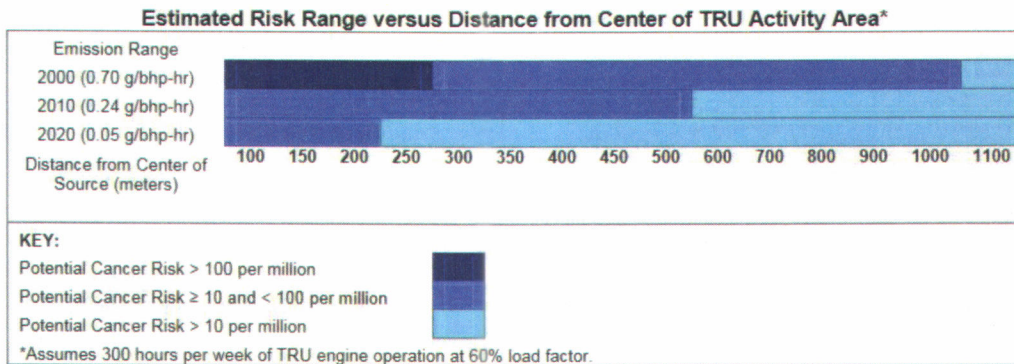
Require the posting of signs outside of the facility providing a phone number where neighbors can call if there is an air quality issue

Statements that these warehouses will use 2010 or newer trucks also goes back to monitoring. Warehouses nearby allow older trucks (paint falling off) to use their facilities with COA requiring 2010 or newer trucks.

Why do we suggest buffer zones?

The reduction of potential cancer risk levels at locations where TRUs operate is a direct result of the reduction of diesel PM emissions. Figure 1-1 compares the cancer risk range at various distances assuming 300 hours of TRU activity per week. For year 2000, the current fleet average emission rate of 0.7 g/bhp-hr was used. In 2020, the statewide fleet PM emission rate would be reduced 92 percent from the 2000 baseline year to 0.05 g/bhp-hr. Figure 1-1 below illustrates the significant reduction of the estimated near source risk as the diesel PM emission rate is reduced from the current fleet emission rate to the much lower emission rate in 2020.⁴

Figure 1-1



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

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

Policies:

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

Community Design

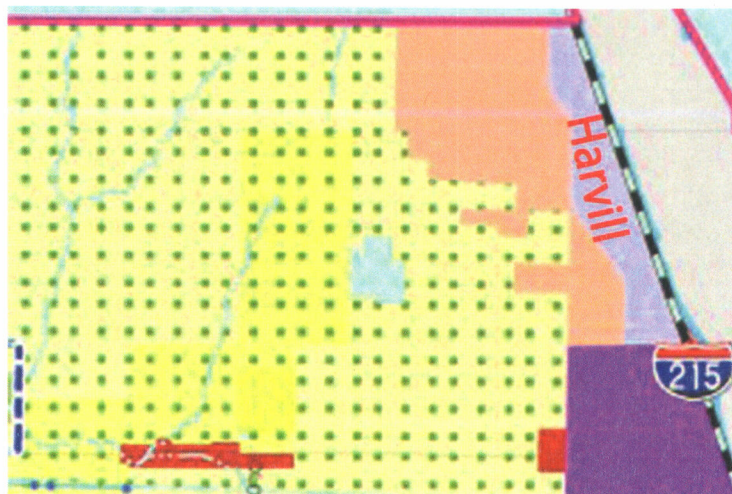
LU 30.2 Control heavy truck and vehicular access to minimize potential impacts on adjacent properties.

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

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

Light Industrial (LI)	0.25 - 0.60 FAR	<ul style="list-style-type: none"> Industrial and related uses including warehousing/distribution, assembly and light manufacturing, repair facilities, and supporting retail uses.
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<p>COMMUNITY DEVELOPMENT</p> <ul style="list-style-type: none"> Light Industrial High Industrial Business Park Public Facilities Mixed Use Planning Area 	<p>RURAL COMMUNITY</p> <ul style="list-style-type: none"> Estate Residential (2 ac min) Very Low Density Residential (1 ac min) Low Density Residential (0.5 ac min)
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S Mauve color is Business Park, light purple is Industrial, dark purple is Community

Center,

Warehouses are being proposed outside of the Business Park land use area changing the Mead Valley Area Plan and Vision

According to the **Environmental Assessment (E.A.) Number 40250 for the current warehouse project (Oleander Business Park):**

“Findings of Fact: Proposed land use and zoning for the project site includes Industrial Park and Business Park; both of which are contained within the Community Development Foundation Component of the Riverside County Land Use Designations. Therefore, the development of the proposed project may incrementally increase the amount of potentially hazardous substances in the project area.”

Source: County General Plan Program EIR Section 4.11 “Hazardous Materials,” project specific Phase I Environmental Site Assessment, URS, September 28, 2004; project specific “General Biological Survey,” L&L Environmental, March 8, 2005; and project specific “Geotechnical Investigation,” Southern California Geotechnical, November 4, 2004.

PROJECT

The Project proposes to build two high-cube logistics warehouses totaling 1,113,627 square feet. Building "D" is a 702,645 square foot located to the east of Decker/Ellsworth Street and south of Old Oleander on 37.1 acres; and Building "E" is a 410,982 square foot building to the west of Decker/Ellsworth and south of Oleander on 21.5 acres.

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

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

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

First

Many of the EIR documents are using out of date information from 2014 and 2015 such as Biological Reports, Cultural Reports, Traffic Studies, etc. Conditions for this project have changed dramatically in a number of ways. Traffic studies fail to include additional mega high cube warehouses currently under construction in the vicinity that were once zoned for residential and commercial land uses. Habitat for wildlife is diminishing rapidly forcing more animals to look for suitable habitat land nearby. **Several warehouses are currently under construction along the eastern portion of Harvill between Markham and Cajalco. These are not included in EIR 546.**

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

- Urban Crossroads noise analysis study for the "Project"
"The traffic noise levels provided in this analysis are based on the traffic forecasts found in the Knox Business Park Traffic Impact Analysis prepared by Urban Crossroads, Inc. in June 2015 (page 23). Outdated traffic report almost 3 years ago. Based on Urban Crossroads noise analysis outdated study as numerous warehouses are currently under construction along Harvill south and east of Markham as part of the Majestic Business Park. One very large warehouse was just completed north of Harley Knox x Nandina.
- 1) 4.5-2 Thirty days prior to grading, a qualified biologist shall make a determination regarding the presence or absence of the burrowing owl. The determination shall be documented in a report to be reviewed and accepted by the County of Riverside. If the species is determined to be present, and the MSHCP's stated objectives 1-4 for burrowing owl have not yet been met as determined by the Riverside County Environmental Programs Department, mitigation shall be required in compliance with the MSHCP, Appendix E which states:
 - a. If the site contains or is part of an area supporting less than 35 acres of suitable habitat or the survey reveals that the site and surrounding areas

support less than 3 pairs of burrowing owls, then the on-site burrowing owls shall be passively or actively relocated following accepted protocols.

- b. If the site (including adjacent areas) supports 3 or more pairs of burrowing owls, supports greater than 35 acres of suitable habitat and is non-contiguous with MSHCP conservation Area Lands, at least 90 percent of the area with long term conservation value and burrowing owls shall be conserved on-site. If grading and construction activities occur between February 1 and August 31 and within 150 feet of suitable raptor nesting locations (trees), a focused raptor survey shall be conducted by a qualified biologist prior to issuance of grading permits. If active nests are located within the portion of the site to be disturbed, measures shall be initiated to avoid impacts to nesting raptors. Measures to avoid impacts will include identifying the location and creating a buffer zone around the tree within which impacts shall be avoided until the juveniles have fledged. (Mitigation Measures – EIR 485 - page 199).

EXHIBIT 1-A: LOCATION MAP



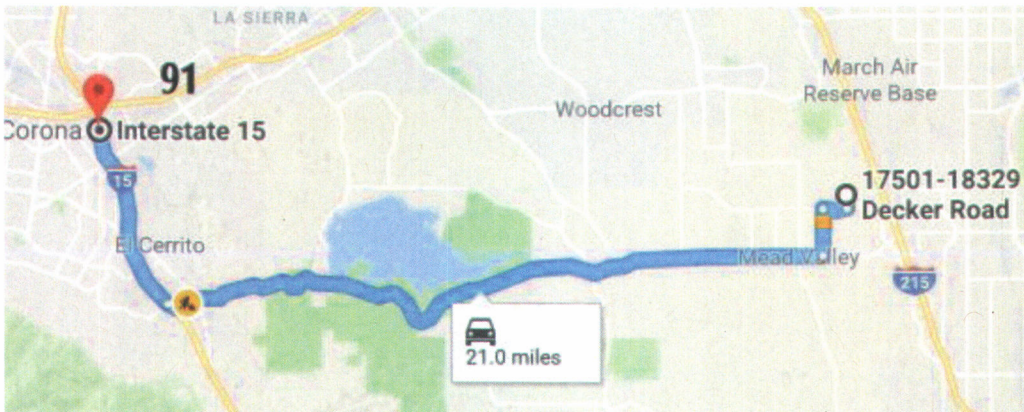
Old Oleander is also undersized for these types of logistics warehouses. Entrances have short distances between them which will make it difficult

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

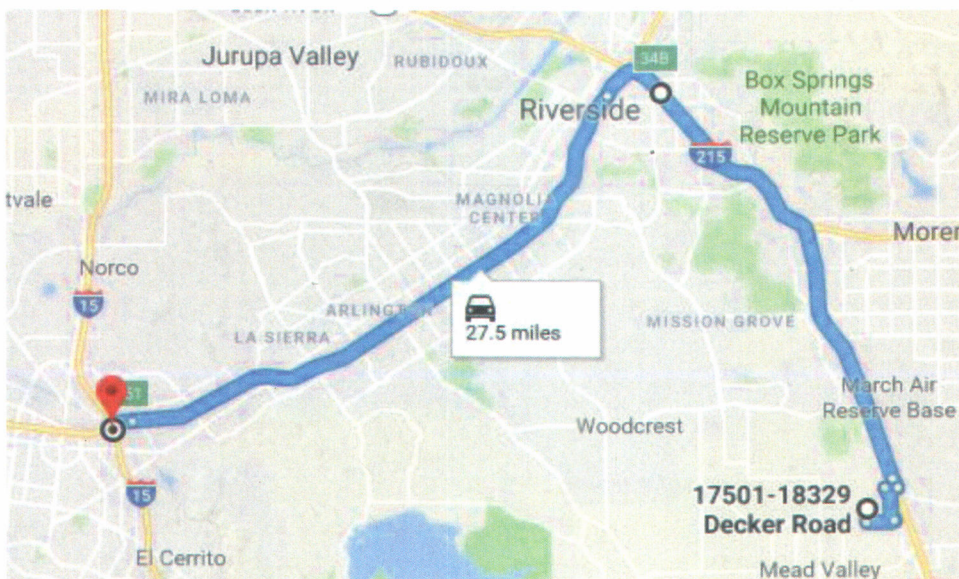
Old Oleander is an Industrial Collector and is designated to have 2 lanes with a minimum right-of-way of 78-feet. Industrial Collectors are circulatory streets with a continuous left-turn lane with at least one end connecting to a road of equal or greater classification.

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

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



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



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

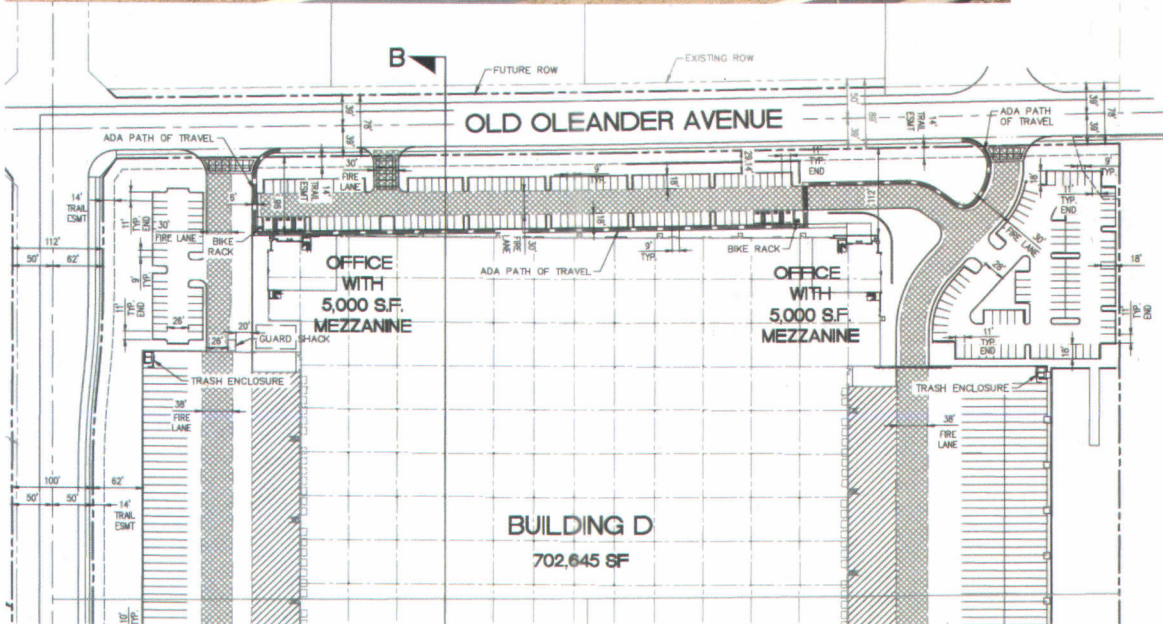


Harvill Ave right hand lane blocked as trucks are trying to gain entry into the logistics warehouse at Harvill X Old Oleander Road. Trucks are blocking traffic as cars are turning left from Harley Knox onto Harvill Ave. There were a number of near accidents caused by these trucks stopped in the right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



Truck blocking Harvill as the driver turns left from the center median to get into the warehouse gate entrance. This is the same type of conditions that trucks will incur trying to turn left from Old Oleander into the driveways of Buildings E and D. Trucks that are

unloaded and trying to travel to Harvill will be idling in the road as they wait to get past trucks parked in the middle of the road. Statements that there are adequate room at the entrances does not allow for 2 tenants for each warehouse with their own entrance.



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

Second.

The project seeks to merge a number of parcels together with various zoning and land use designations to create 2 large parcels in order to build two distinct high cube logistics warehouses. These two high cube warehouses are being considered as one

project totaling over 1.1 million sq ft. **This type of piecemealing or segmentation is not allowed under CEQA. Therefore EIR 546 must be revised and recirculated so that this error to piecemeal the project can be corrected.**

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

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

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

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

EIR 546 does not mention future Trammel Crow phases for warehouses within the Knox Business Park or the impacts that these future high cube warehouses will have on the surrounding rural neighborhoods, Community of Mead Valley, surrounding Communities of Greater Lake Mathews, Greater Mead Valley, Woodcrest, Orangecrest or the City of Riverside.

No mention of the impacts of the Mid-County Parkway that exits onto the I-215 near Placentia / Rider Streets bringing thousands of additional trucks to Cajalco Road going west to the I-91.

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

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

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

For modification of a permit for an existing facility, the scope of the project description can be limited to the scope of the permit modification and does not cover the entire facility. *Citizens for East Shore Parks v. State Lands Commission* (2011) 202 Cal.App.

4th 549. (<https://ceqaportal.org//tp/ProjectDiscription03-23-161.pdf>).

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

Third

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

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

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

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

Project Description in the State CEQA Guidelines.

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

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

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

Fourth

MVAP 6.1 In conjunction with the first warehousing/distribution building proposed for the industrial area located along Interstate 215 (including land designated Light Industrial, Business Park, and Light Industrial with a Community Center Overlay) whereby the cumulative square footage of warehousing/distribution space in the area would exceed 200,000 square feet, an Environmental Impact Report (EIR) shall be prepared that assesses the potential impacts of the project. The EIR must address air quality, including a health risk assessment of diesel particulates and impacts to sensitive receptors, truck traffic and noise, and the cumulative impacts of reasonably foreseeable warehouse development in the area (Mead Valley Area Plan, pg. 32).

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

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

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

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

Noise Sensitive Land Uses

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

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

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

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

N 15.2 Require that commercial and residential mixed-use structures minimize the transfer or transmission of noise and vibration from the commercial land use to the residential land use. (AI 105)

Policies:

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

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

Noise: Rural Community VLDR

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

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

b. Power Tools and Equipment. No person shall operate any power tools or equipment between the hours of 10:00 p.m. and 8:00 a.m. such that the power tools or equipment are audible to the human ear inside an inhabited dwelling other than a dwelling in which the power tools or equipment may be located. No person shall operate any power tools or equipment at any other time such that the power tools or equipment are audible to the human ear at a distance greater than one hundred (100) feet from the power tools or equipment. Blasting and rock crushing will be performed for almost two years. The sound from this operation will penetrate nearby homes with objectionable excessive sound trespass.

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

Almost 2 years of rock blasting and crushing next to homes will create excessive noise, dust, PM 10 and PM 25, air pollution, and vibration.

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

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

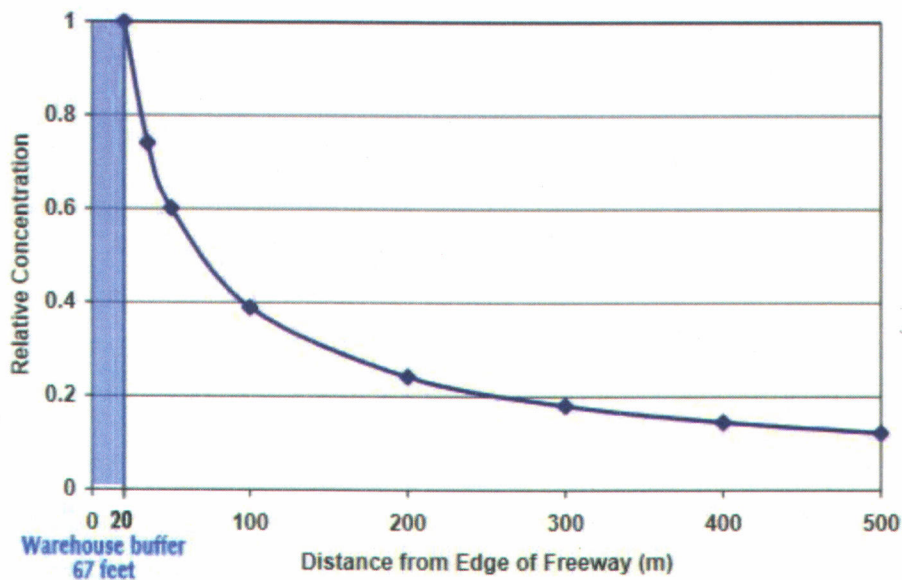
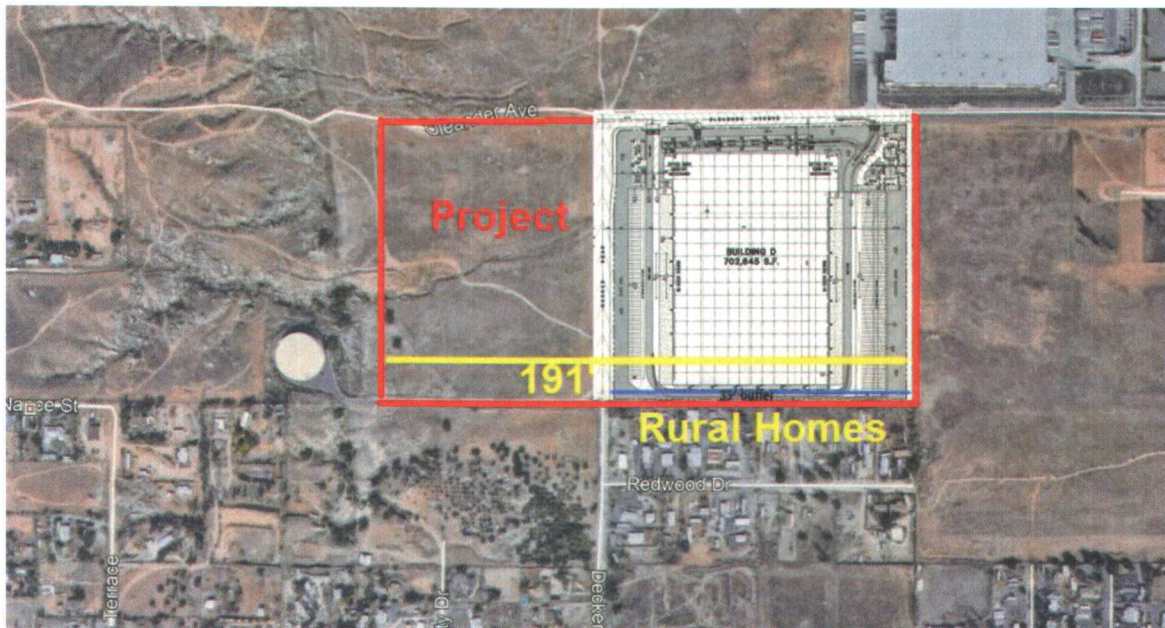
<https://www.dailynews.com/2017/05/24/why-is-southern-californias-air-quality-so-bad-its-smog-season/>

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

EIR 546 not only fails to meet CEQA guidelines, but also falls short of the Riverside County General Plan - Mead Valley Area Plan for land use with NO buffer between sensitive receptors and Building "D". The total square footage of Building "D" and "E" will be over 1.1 million square feet of high cube warehouses up to 55' tall removing all view of the valleys and mountains from residents living nearby and up the hill at Day Street. The buildings will have very tall slopes up to 17' tall next to homes, a secondary highway and community trail. The EIR does not address the ineffective noise / pollution barriers that will be put in place as an attempt to protect rural residents against harmful

cumulative effects of noise pollution, air pollution, light trespass, truck traffic, vibration day and night 24-7. EIR states buffer of 191' between residents and warehouse. The actual buffer is just 67' from the property line between rural residents and the warehouse. Trucks utilizing the southern driveway will be much closer to resident's homes.

The warehouse similar to this on Harvill has numerous truck trailers parked in the north section auto parking areas which in the case of this project will be next to resident's homes. The warehouses at Oleander X Decker is designed with a driveway around the south end of the warehouse. Trailers will park along this southern driveway near resident's backyards.



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

Figure 2-1

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

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

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

Table 2-2

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

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

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

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

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

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

Riverside County General Plan - Chapter 10 - Healthy Communities Elements

Policies:

HC 14.1

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

HC 14.2

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

http://planning.rctlma.org/Portals/0/genplan/general_Plan_2017/elements/OCT17/Ch10_HCE_120815.pdf?ver=2017-10-11-102105-050

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

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

Potential Mitigation Measures

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

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

A. Mobile Source Toxics Analysis

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

In August 2002, the SCAQMD's Mobile Source Committee approved the "Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions." This document provided guidance for analyzing cancer risks from diesel particulate matter from mobile sources at facilities such as truck stops and warehouse distribution centers. Subsequently, SCAQMD staff revised the aforementioned document to expand the analysis to provide technical guidance for analyzing cancer risks from potential diesel particulate emissions impacts from truck idling and movement (such as, but not limited to, truck stops, warehouse and distribution centers, or transit centers), ship hotelling at ports, and train idling. This revised guidance document titled, "Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source

Diesel Idling Emissions for CEQA Air Quality Analysis" was presented to and approved by the SCAQMD's Mobile Source Committee at its March 28, 2003 committee meeting.

Particulate Matter

The Environmental Protection Agency (EPA) defines particulate matter (PM) as either airborne photochemical precipitates or windborne dust. Consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols, common sources of PM are manufacturing and power plants, agriculture, diesel trucks and other vehicles, construction sites, fire and windblown dust. Generally PM settles from atmospheric suspension as either particulate or acid rain and fog that has the potential to damage health, crops, and property. Particulate of 2.5 microns or smaller (2.5 microns is approximately equal to .000098 inches) may stay suspended in the air for longer periods of time and when inhaled can penetrate deep into the lungs. Among the health effects related to PM2.5 are premature death, decreased lung function and exacerbation of asthma and other respiratory tract illnesses.

Airborne particulate matter sized between 2.5 and 10 microns (10 microns is approximately equal to 0.0004 inches), known as PM10 also pose a great risk to human health. PM10 can easily enter the air sacs in the lungs where they may be deposited, resulting in an increased risk of developing cancer, potentially changing lung function and structure, and possibly exacerbating preexisting respiratory and cardiovascular diseases. It can also irritate the eyes, damage sensitive tissues, sometimes carry disease, and may even cause premature death. PM2.5 and PM10 are especially hazardous to the old, young and infirmed.

Control Measures

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

AQ 17.8

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

AQ 17.9

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

AQ 17.10

Promote and encourage the use of natural gas and electric vehicles in distribution centers. (AI 146, 147). Truck goats must be electric instead of diesel.



"The Business Park uses on the west side of Harvill Avenue provide a buffer for residential uses to the west". Zoning to the south of Building "E" is A-1-1 and allows for rural one acre homes. A buffer must be provided for future residents. (<http://planning.rctlma.org/Portals/0/genplan/content/ap1/meadvalley.html>).

Health

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

(Riverside County Vision Statement, Pg. V3)

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

**Mead Valley Area Plan
Industrial Development**

Given the proximity of the rural community and residential uses, the impacts of industrial expansion on localized air quality, traffic, noise, light and glare need to be assessed in order to apply appropriate measures to mitigate impacts so that the environmental quality of the community and residents' health and welfare are maintained (Mead Valley Area Plan, pg. 36).

Policies:

Fifth.

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

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

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

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

Certainly this is not adequate as residents will not have access to the Project site once construction is under way. Residents will not be aware of any signage or posting on the construction site and 24 hours is not enough notice to take measures to safeguard their property and livestock. Residents surrounding this project site must be notified in person, written notice or with a notice attached to the property gate as to the date and time that blasting will occur at least 72 hours prior to blasting. The EIR fails to take into account that this a rural neighborhood where many residents have large livestock and other animals that may become frightened from the noise and vibrations of these blasts. Residents have the right to protect their property (including livestock) from injury and

damage.

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

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

DEIR SCH No. 2015081081. Page 3-32 - 3.6 CONSTRUCTION CHARACTERISTICS
As part of proposed grading activities, blasting would be necessary in hard rock areas on the southern portion of the Project site. Based on the excavation plans prepared on June 16, 2015, by the Henry- Ann Company, rock blasting within the Project site is expected to include the drilling of up to 5,253 holes in the largest area, in which small charges would be placed to fragment the rocks into smaller, crushable pieces.

Approximately 112,090 cubic yards (c.y.) of rock is expected to be produced during proposed blasting activities, which would be crushed and used on the Project site as construction base. An electric rock crusher powered by a 300 horsepower diesel generator is proposed to further break down the fragmented rocks. The Project Applicant calculates that approximately 2,759 tons of rock would be processed on the Project site per day during the blasting and rock crushing phase of construction (approximately 65 working days). (Urban Crossroads, Inc, 2015a, pp. 28-29).

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

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

OSHA- CONTROL OF SILICA DUST IN CONSTRUCTION

Crushing Machines

Using crushing machines at construction sites to reduce the size of large rocks, concrete, or construction rubble can generate respirable crystalline silica dust. When inhaled, the small particles of silica can irreversibly damage the lungs. This fact sheet describes dust controls that can be used to minimize the amount of airborne dust when using crushing machines as listed in Table 1 of the Respirable Crystalline Silica Standard for Construction. 29 CFR 1926.1153

Sixth.

Truck and vehicle traffic is not adequately addressed in the EIR. Two main entrances along Oleander are indicated on Building "D" & "E" Site Plans. These plans also indicate two distinct offices with one at the northwest and one at the northeast corners of

Building "D" & "E" This indicates that buildings "E" and "D" will have more than one tenant. Trammel Crow Knox Business Park Building at 17789 Harvill Ave. has several tenants, which is creating enormous traffic, health and safety concerns with 30 or more diesel trucks lined up outside of the entrance to the facility. These logistics trucks are lined up along Harvill Ave. idling for hours, blocking the right lane of the road and left turn lane onto Harvill from Harley Knox.

Logistics trucks from these warehouses must not be allowed to use our dangerous narrow rural roads. Signage is not enough to prevent logistics trucks from this warehouse from using Decker Road. Decker Road must be closed to through traffic past the Project's southern boundary line. Closure of Decker Road must include barriers that prevent logistics trucks from accessing Decker Road past the southern boundary line of Building "D". This will allow EMWD to continue to access the road to the water tank.

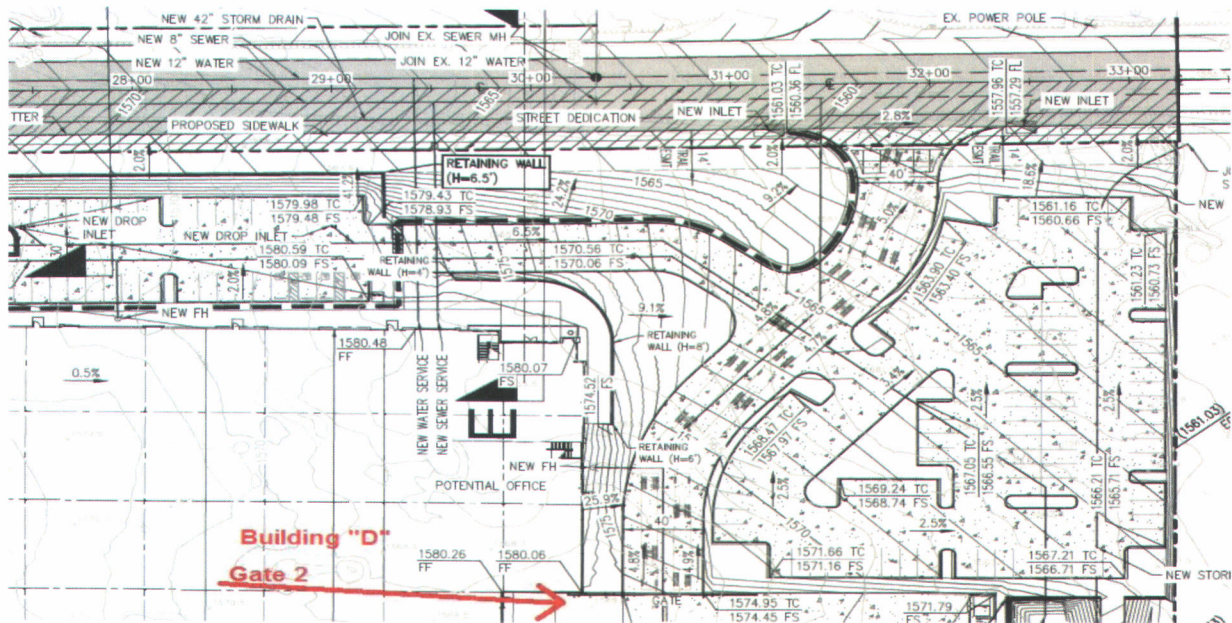


Harvill Ave. with trucks lined up to enter the warehouse at 17789 Harvill Ave.

Harvill Ave. with trucks parked in the right lane and cars having to move over to the left lane.

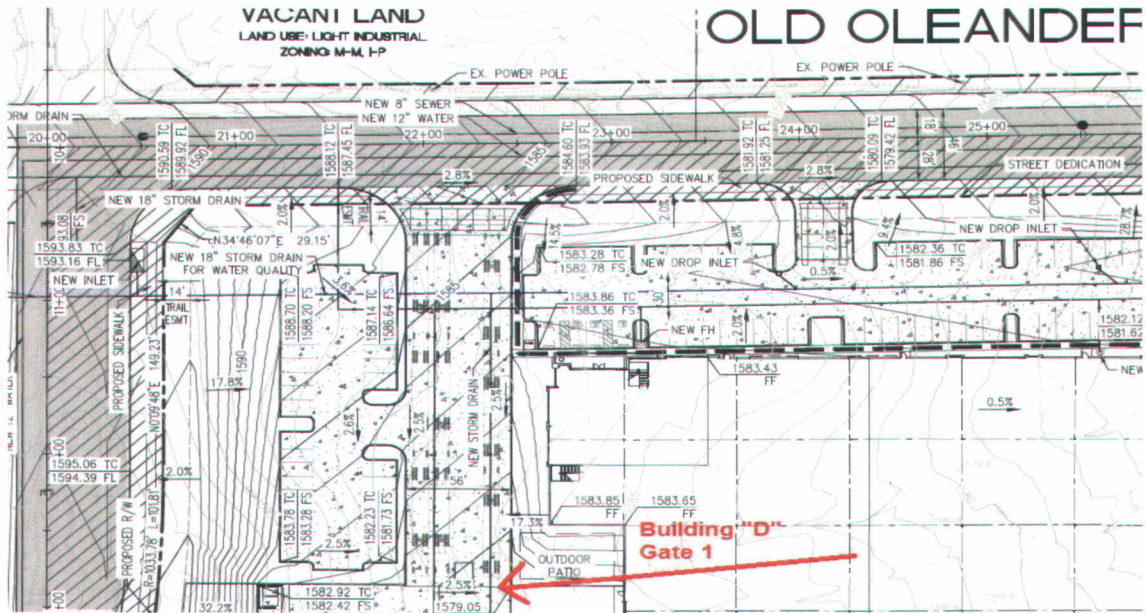
Harvill Ave was never built to County standards and is not wide enough for trucks to park along the side of the road and allow other vehicles to drive in the right lane. Harvill

Ave. is the main thoroughfare for thousands of trucks that will be accessing Building "E" and "D", current and future high cube logistics warehouses. Traffic studies for this project have not adequately addressed the number of trucks from these warehouses, impacts from these trucks, routes that these trucks will take to access the ports of LA and Long Beach, the health and safety of local residents who will be driving not only Harvill Ave, but numerous other roads that trucks from these warehouses will be using throughout the region.



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

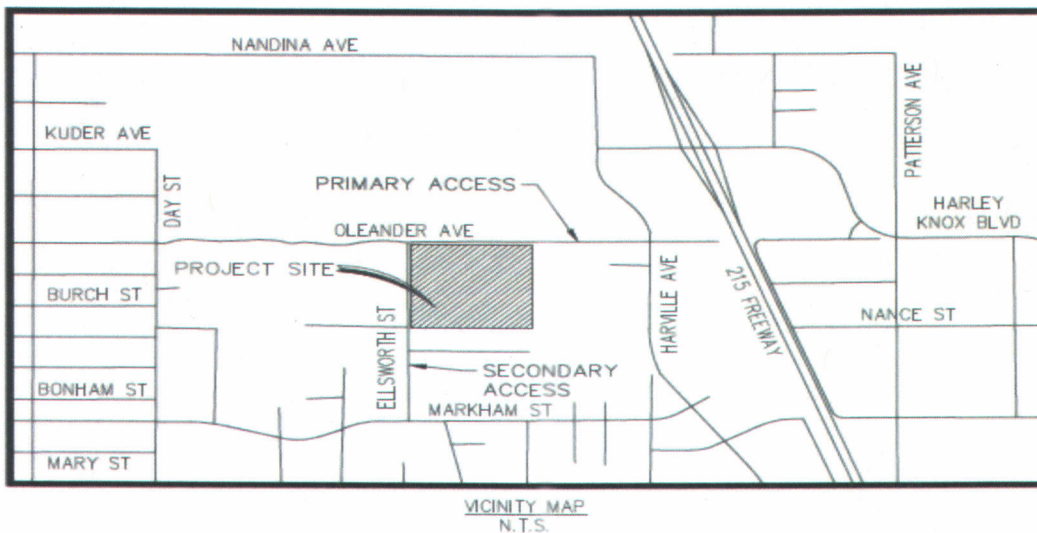
Having two gates and two separate offices one at the east side of the building and one on the west side of the building indicates that Building "D" and "E" are set up for two tenants per warehouse. This is not addressed in the EIR. Traffic studies, air quality studies, noise studies, health and safety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



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

Seventh.

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



The site plan indicates that Old Oleander will be the Primary Access and Ellsworth / Decker will be the secondary access for trucks coming into and leaving Building D and E.

This has not been evaluated in the EIR as there are a host of very serious concerns using Ellsworth / Decker Road south of the project for any logistic truck access or any type of vehicle traffic or activity.

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



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

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



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



Day Street at Cajalco

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

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

Eighth.

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

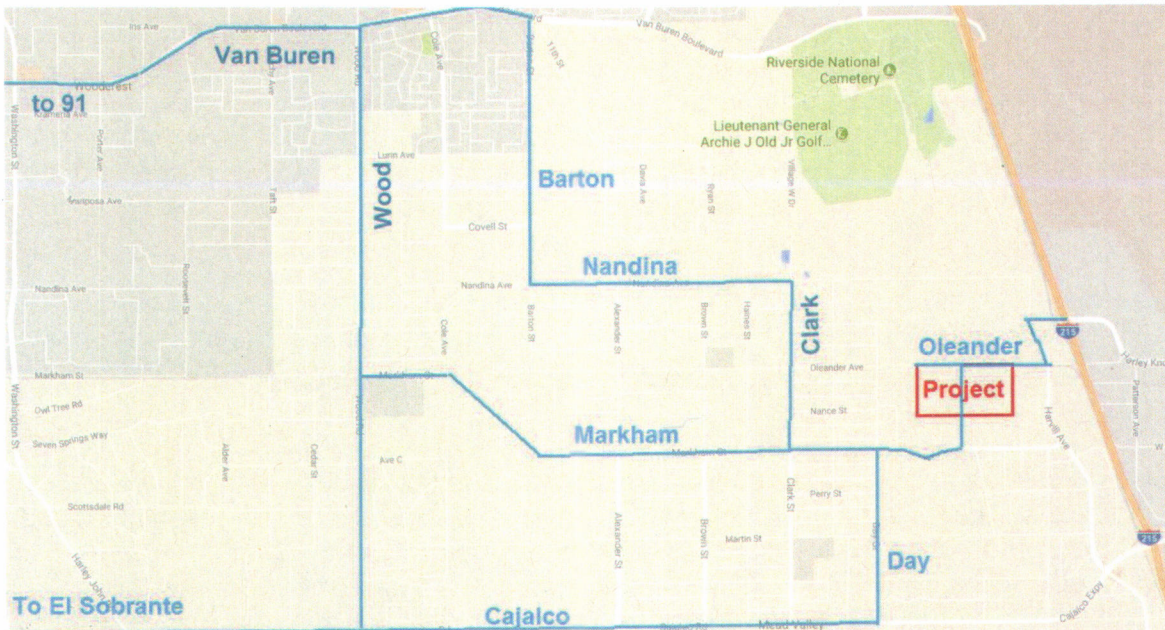
The traffic study does not address the additional truck traffic impacts to the rural communities of Mead Valley, Greater Lake Mathew and the City of Riverside. Once trucks access Markham Street they can find a number of routes that lead to Van Buren Blvd, Cajalco Road and El Sobrante instead of using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

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

Ninth.

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

that will be using the I-215 Freeway. Harley Knox off-ramp is already backed up onto the I-215 much of the day.



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

Tenth

E3.0 PROJECT DESCRIPTION

1. Earthwork and Grading

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

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

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

Eleventh

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

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



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

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

Project site per day during the blasting and rock crushing phase of construction (approximately 65 working days) (Urban Crossroads, Inc, 2016a, pp. 31-32). Rock Blasting would also need to take place on the lot for Building "E".

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

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

Twelfth

3.5 OPERATIONAL CHARACTERISTICS

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

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

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

condition of approval (Knox Business Park Bldgs D and E EIR-4, page S-18). Signs need to be installed before occupancy. Signs need to be posted along the outside perimeter of the warehouses, "idling restricted to 5 minutes".

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

Thirteenth.

Jobs.

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

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

The EIR does not address the true estimates of jobs being created by this Project. A true estimate is difficult to predict, but it is a fact that within the next few years and very possibly by the time that these warehouses are built, the automation and robotic technology will have eliminated a large portion of the 1,081 jobs estimated to occur. It is hard to know if trucks will be driverless, but certainly the workers within the facilities will be very limited in numbers. The EIR for this project is extremely flawed in the assumption that over 1,000 jobs will be created.

II. "Envision a self-guided forklift streaming down a narrow aisle, feeding inventory into a rack system towering 40 feet above the warehouse floor, while an auto-guided mini-robot transports outbound inventory to fulfillment stations lit up like holiday lights, enabling order processing of up to 2,400 picks per hour. As the perfect order is complete, a high-speed conveyor shuttles packages toward a stationary robot, which

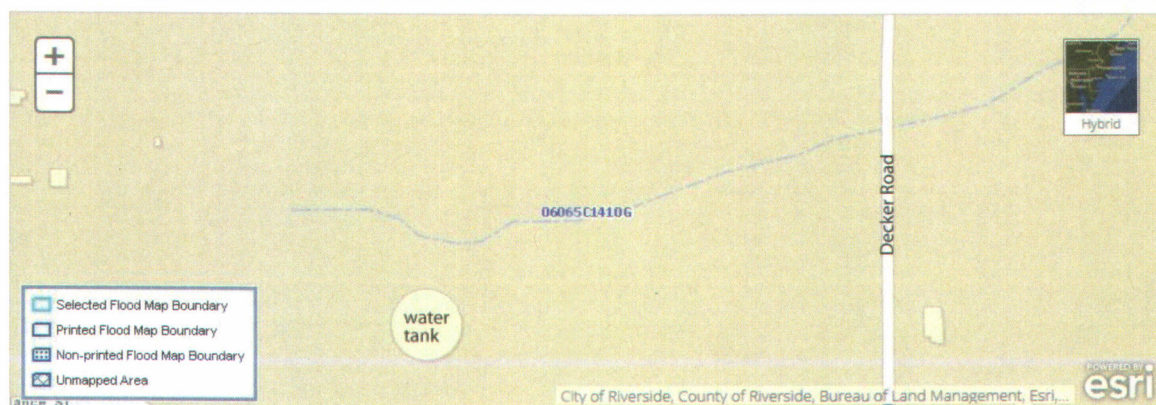
loads the contents into a driverless tractor-trailer. Could this be a look into the warehouse of the 22nd century? Nope, it's the modern distribution center of today" (Warehouse Automation: The Next Generation by Charlie Fiveash, January 27, 2016, Inbound Logistics).

Fourteenth.

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

FEMA Flood Map Service Center : Search By Address

Locator Map



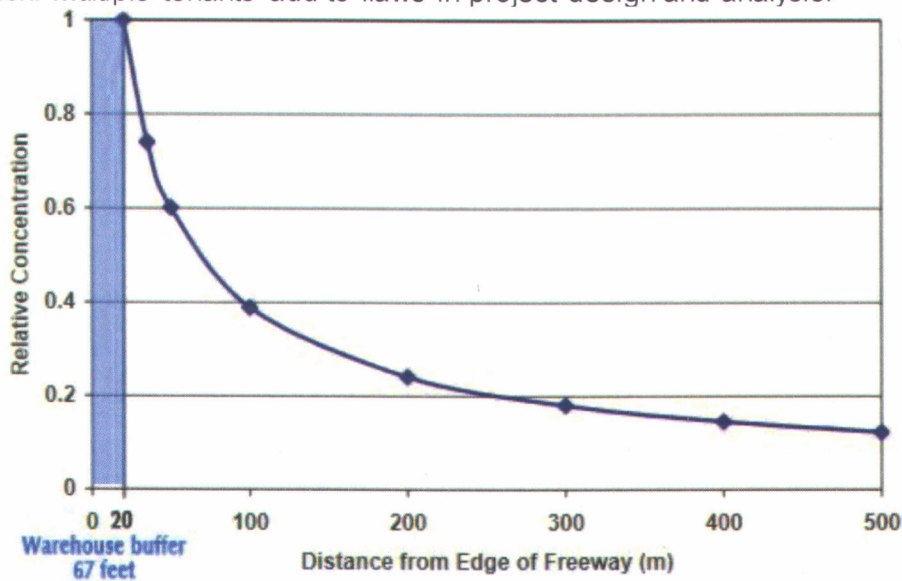
Riverside County Flood Map clearly shows a blue line stream traversing across the entire Project site. The blue line stream is part of the wetlands to the west of the project site. All of this is subject to "waters of the United States" are therefore generally subject to federal environmental regulations.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

Fifteenth.

The EIR does not include the WRCOG and SCAQMD good neighbor policy that sets a 1000 foot buffer between sensitive receptors and distribution warehouses. The current proposal for Building "D" has the warehouse project directly next to homes. No setback or buffer as trucks will be traveling from the east side of the warehouse to the west side of the warehouse using a driveway just a few feet from rural property lines. Small walls along the parking spaces will not prevent air pollution or noise from back up beepers, the hazards and dangers of noise pollution, air pollution, vibration and light trespass 24-

7. Trucks are able to park outside of the parking stalls along the southern driveway as is occurring right now at the logistics warehouse at Harvill Ave. and Oleander. (WRCOG Good Neighbor Policy Guidelines for Siting Warehouse/ Distribution Facilities). [Good Neighbor Guidelines for Siting Warehouse/Distribution Facilities](#).

Warehouse at Oleander X Harvill has numerous trucks parked outside of the parking stalls along the north side of the building. Trucks are idling along this area, unloading, back up beepers going off day and night. GPA 1151 & 1152 proposed project has this same style of driveway along the south of Building "D" directly adjacent to rural homes. The EIR does not address parking issues such as this, trucks backed up onto local roads idling for hours as they arrive to unload their goods. Trucks parked in the middle of the road as Harvill was not designed for trucks to park on the shoulder. These same conditions exist for Building "D" and "E" with trucks having to turn left to enter the buildings and limited truck queuing space at the warehouse entrance behind the guard shack. Multiple tenants add to flaws in project design and analysis.



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

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

Sixteenth

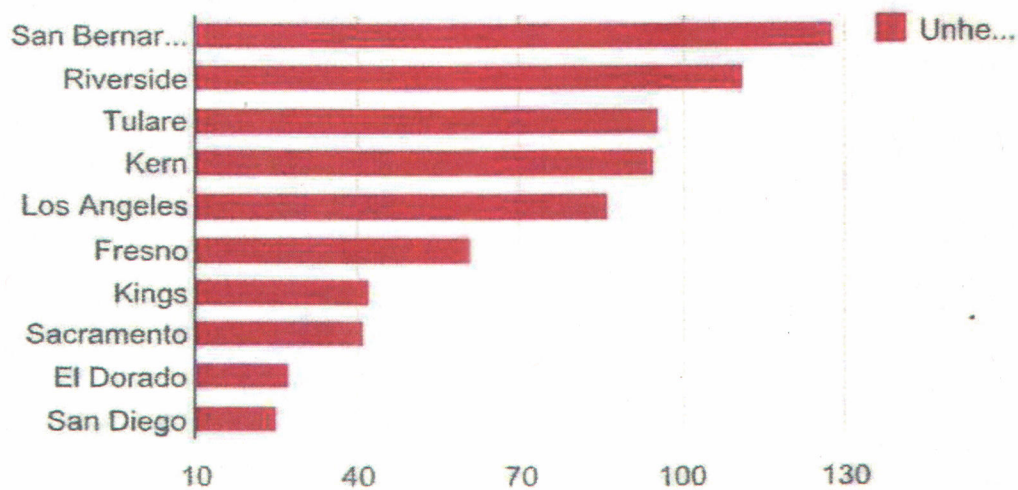
Article from SCAG.

What is Environmental Justice?

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

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

Most ozone polluted counties in the U.S.



Source: American Lung Association

Seventeenth.

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

Riverside County Vision

The simplest way to summarize our vision for Riverside County is to say that:
"Riverside County is a family of special communities in a remarkable environmental setting."

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

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

http://planning.rctlma.org/Portals/0/genplan/general_plan_2013/1%20General%20Plan/Chapter%203-Land%20Use%20Element%20Adopted-Final%20Clean.pdf

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

northeast corners of Building "D" & "E" This indicates that buildings "E" and "D" will have more than one tenant. Impacts from multiple tenants are not addressed in the EIR. Similar warehouse at 17789 Harvill owned by Trammel Crow has multiple tenants which is creating a number of serious violations of CEQA and CARB. Trucks idling for hours as they are queuing to enter the facility. Lining up in the roadway of Harvill Ave. blocking traffic. Idling within the facility for hours. Parking in unauthorized areas because truck trailer parking is full.

- Ellsworth Street / Decker Road is set as the secondary access for Building "E" and "D". EIR fails to adequately evaluate and disclose project impacts from allowing truck access past the improved sections of Ellsworth / Decker Road. This is an unimproved dirt road with pot holes, speed bumps and uneven surfaces that is certainly not up to any standards that would meet CEQA or AQMD guidelines for noise, dust, vibration and air quality.

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

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

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

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

There is another choice. RAMV.org recommends the NO Project Alternative – to leave the area as open space and protect the wildlife corridor. The second choice would be to retain the existing land use of Business Park and Rural Residential.

Business Park zoning would allow smaller businesses that create real jobs, sales taxes and operate from 8:00am to 6:00 pm not 24-7. This zoning follows the Riverside County General Plan – Mead Valley Area Plan and vision for the area. Any buildings should allow for a substantial buffer (1000 ft.) between rural homes and Industrial land uses. The Business Park alternative would reduce the operational effects of the project substantially reducing truck trips, air pollution, traffic, noise, truck idling times, diesel particulate PM and NOx emissions, off-site parking, prostitution and increased crime.

Conclusion

I urge the Board of Supervisors to vote NO on EIR 546 which is fatally flawed and must be substantially revised and recirculated to correct numerous and significant flaws, errors and omissions much of which are included in this letter. Additional mitigation measures will need to be included into any future Environmental Impact Reports regarding GPA 1151 & GPA 1152.

The Rural Association of Mead Valley is totally opposed to this proposed project of General Plan Amendments GPA 1151 & 1152 and opposed to zone changes from Business Park land use to Industrial Park so that two massive logistics warehouse can be built directly next to homes in the middle of our rural community. This project will create massive truck congestion, air pollution, noise pollution and additional dangers on

our local rural roads

Sincerely,

A handwritten signature in blue ink that reads "Debbie Walsh". The signature is written in a cursive style with a large, looped initial "D".

Debbie Walsh
President, Rural Association of Mead Valley

Maxwell, Sue

From: Maxwell, Sue
Sent: Tuesday, May 22, 2018 7:51 AM
To: COB-Agenda (COB-Agenda@rivco.org); George Johnson (GAJohnson@RIVCO.ORG); Leach, Charissa (cleach@RIVCO.ORG); Perez, Juan (JCPEREZ@RIVCO.ORG); Young, Alisa; District 4 Supervisor V. Manuel Perez (District4@RIVCO.ORG); District2; District3; District5; Supervisor Jeffries - 1st District (district1@rivco.org)
Cc: Russell Brady (rbrady@RIVCO.ORG)
Subject: May 22, 2018 Agenda Item 18.1 - Public Comment Opposing Mead Valley Warehouse GPA 1151, 1152 (Debbie Walsh)
Attachments: DebbieLetter_1151-1152_BOS_May22_2018.pdf

Tracking:	Recipient	Read
	COB-Agenda (COB-Agenda@rivco.org)	
	George Johnson (GAJohnson@RIVCO.ORG)	Read: 5/22/2018 7:54 AM
	Leach, Charissa (cleach@RIVCO.ORG)	
	Perez, Juan (JCPEREZ@RIVCO.ORG)	
	Young, Alisa	
	District 4 Supervisor V. Manuel Perez (District4@RIVCO.ORG)	
	District2	
	District3	
	District5	
	Supervisor Jeffries - 1st District (district1@rivco.org)	
	Russell Brady (rbrady@RIVCO.ORG)	

Good morning,

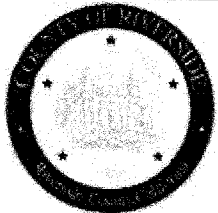
The email below and 49-page letter attached were received via COB, in opposition to the proposed warehouse project in Mead Valley. Please review, if possible, before today's Board Meeting, May 22, 2018, Item 18.1 (MT 7034).

This has been printed and included with back-up to Item 18.1.

Thank you kindly,

Sue Maxwell

Board Assistant
Clerk of the Board of Supervisors
4080 Lemon Street, 1st Floor, Room 127
Riverside, CA 92501
(951) 955-1069 Fax (951) 955-1071
Mail Stop #1010
smaxwell@rivco.org
<http://rivcocob.org/>
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From: Debbie Walsh [mailto:abilene149@gmail.com]
Sent: Monday, May 21, 2018 7:25 PM
To: COB <COB@RIVCO.ORG>; Supervisor Jeffries - 1st District <district1@RIVCO.ORG>; Brady, Russell <rbrady@RIVCO.ORG>
Subject: May 22, 2018 BOS meeting - Agenda Item 18.1. GPA 1151, 1152

Riverside County Supervisors,

Maxwell, Sue

From: Maxwell, Sue
Sent: Tuesday, May 22, 2018 7:39 AM
To: 'Debbie Walsh'; Supervisor Jeffries - 1st District; Brady, Russell
Subject: RE: May 22, 2018 BOS meeting - Agenda Item 18.1. GPA 1151, 1152

Ms. Walsh,

The Clerk of the Board of Supervisors is in receipt of your 49-page opposition letter sent via email regarding Item 18.1 and has been distributed and included in the record for May 22, 2018.

Sincerely,

Sue Maxwell

Board Assistant
Clerk of the Board of Supervisors
4080 Lemon Street, 1st Floor, Room 127
Riverside, CA 92501
(951) 955-1069 Fax (951) 955-1071
Mail Stop #1010
smaxwell@rivco.org
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From: Debbie Walsh [mailto:abilene149@gmail.com]
Sent: Monday, May 21, 2018 7:25 PM
To: COB <COB@RIVCO.ORG>; Supervisor Jeffries - 1st District <district1@RIVCO.ORG>; Brady, Russell <rbrady@RIVCO.ORG>
Subject: May 22, 2018 BOS meeting - Agenda Item 18.1. GPA 1151, 1152

Riverside County Supervisors,

The RAMV Rural Association of Mead Valley and RAGLM representing over 50,000 residents are in total opposition to Agenda Item 18.1. GPA 1151, 1152 for 2 warehouses with a total of over 1.1 million sq. ft. Location: Decker X Oleander.

Debbie Walsh

From: Ray/Peggy <claudierm@yahoo.com>
Sent: Monday, May 21, 2018 10:46 PM
To: Supervisor Jeffries - 1st District; Ketcham, Thomas; Brady, Russell; COB
Subject: Opposing Gpa 1151 and GPA 1152 Please make this a matter of record for the May 22, 2018 meeting

22075 Nance St
Perris, CA 92570

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

May 21, 2018

Re: Item 18.1 - Opposition to GPA1151 and GPA 1152 and Zone changes 7873 and 7872

Final Environmental Impact Report No. 546

Dear Honorable Supervisors:

We are neighbors to this massive project and we are opposing the rezoning and building of these massive warehouses in the area of rural homes. In the area up for rezoning and the building of these warehouses we can see egrets, burrowing owls and the white owls in the area. There are other flying fowl. We see hawks and turkey buzzards and other smaller birds all year long. There are floral and fauna that flourish at some times of the year.

Our view has already been affected by the current warehouses that have been built. We built our forever home here to enjoy the open space and the view. We made our home here for the quietness and tranquility of being rural. We have already been impacted by the warehouses that have been built close to Harvill and Nandina Avenues. Not only is our view impacted but there is noise with the peeping of the trucks 24/7. This is most disturbing at night. All the light coming from these current warehouses effects our peaceful evenings. We can't imagine how much worse this noise and light pollution will be if these two warehouses are approved.

We oppose it because of the health issues caused by all of the pollutants in the air caused by the trucks. Trucks idling for hours will put much more toxic pollution in the air, in our area, beyond what the EIR 546 study says in the report. It makes our asthma worse and we are sick more often. Ray has a disease and has been having treatment and we want to spend more time on our porch enjoying our rural ilife style. It will become more difficult for him to spend much time outside without it being more damaging to his health. A really big concern for us is for the young ones. We have our great grand children that visit and they will be breathing the bad air caused by all the trucks on the road and idling polluting the air. Our great grand children's health will be adversely affected if these warehouses, so close to our home, is built.

There is a blind curve on Markham and there are a few trucks already traveling this road very slowly. Traffic is very heavy at times. It will be so much more dangerous, on this winding road, with people trying to pass these very long, slow moving trucks. Harvill has already become a danger and a traffic hazard with trucks idling and making dangerous U-turns.

Our safety and health and our great grandchildren's safety and health and our visitor's safety and health will be adversely affected if these warehouses are built. Please vote to stop these warehouses from being built in our beautiful tranquil rural neighborhood. Thank you for this consideration.

Maxwell, Sue

From: Maxwell, Sue
Sent: Tuesday, May 22, 2018 8:10 AM
To: COB-Agenda (COB-Agenda@rivco.org); George Johnson (GAJohnson@RIVCO.ORG); Leach, Charissa (cleach@RIVCO.ORG); Perez, Juan (JCPEREZ@RIVCO.ORG); Young, Alisa; District 4 Supervisor V. Manuel Perez (District4@RIVCO.ORG); District2; District3; District5; Supervisor Jeffries - 1st District (district1@rivco.org)
Cc: Russell Brady (rbrady@RIVCO.ORG); Ketcham, Thomas
Subject: May 22, 2018 Item 18.1 - Public Comment Opposing GPA 1151 and GPA 1152 (Ray and Peggy Miller)

Good morning,

The email below was received via COB in opposition to the proposed warehouse project in Mead Valley. Please review, if possible, before today's Board Meeting, May 22, 2018, Item 18.1 (MT 7034).

This has been printed and included with back-up to Item 18.1.

Thank you kindly,

Sue Maxwell

Board Assistant

Clerk of the Board of Supervisors

4080 Lemon Street, 1st Floor, Room 127

Riverside, CA 92501

(951) 955-1069 Fax (951) 955-1071

Mail Stop #1010

smaxwell@rivco.org

<http://rivcocob.org/>

<https://www.facebook.com/RivCoCOB/>



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From: Maxwell, Sue

Sent: Tuesday, May 22, 2018 7:17 AM

To: 'Ray/Peggy' <claudierm@yahoo.com>; Supervisor Jeffries - 1st District <district1@RIVCO.ORG>; Ketcham, Thomas <TKetcham@RIVCO.ORG>; Brady, Russell <rbrady@RIVCO.ORG>

Subject: Opposing GPA 1151 and GPA 1152 Please make this a matter of record for the May 22, 2018 meeting

Mr. and Mrs. Miller,

The Clerk of the Board of Supervisors is in receipt of your opposition letter sent via email regarding Item 18.1, and has included it in the record for May 22, 2018.

Sincerely,

Sue Maxwell

Board Assistant

Clerk of the Board of Supervisors

4080 Lemon Street, 1st Floor, Room 127

Riverside, CA 92501

(951) 955-1069 Fax (951) 955-1071

Mail Stop #1010

smaxwell@rivco.org

Maxwell, Sue

From: Maxwell, Sue
Sent: Tuesday, May 22, 2018 8:28 AM
To: COB-Agenda (COB-Agenda@rivco.org); George Johnson (GAJohnson@RIVCO.ORG); Leach, Charissa (cleach@RIVCO.ORG); Perez, Juan (JCPEREZ@RIVCO.ORG); Young, Alisa; District 4 Supervisor V. Manuel Perez (District4@RIVCO.ORG); District2; District3; District5; Supervisor Jeffries - 1st District (district1@rivco.org)
Cc: Russell Brady (rbrady@RIVCO.ORG)
Subject: May 22, 2018 Agenda Item 18.1 - Public Comment Opposing GPA 1151, 1152 (Dr John Minnella-Romano)

Good morning,

The email below was received via COB in opposition to the proposed warehouse project in Mead Valley. Please review, if possible, before today's Board Meeting, May 22, 2018, Item 18.1 (MT 7034).

This has been printed and included with back-up to Item 18.1.

With warm regards,

Sue Maxwell

Board Assistant
Clerk of the Board of Supervisors
4080 Lemon Street, 1st Floor, Room 127
Riverside, CA 92501
(951) 955-1069 Fax (951) 955-1071
Mail Stop #1010
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From: Maxwell, Sue
Sent: Tuesday, May 22, 2018 7:56 AM
To: 'Dr. John L. MINNELLA-Romano' <drjminnella@yahoo.com>; COB-Agenda <COB-Agenda@RIVCO.ORG>; Russell Brady <russellb@migcom.com>; Supervisor Jeffries - 1st District <district1@RIVCO.ORG>
Cc: Debbie Walsh <abilene149@gmail.com>; Debbie Walsh <debbiewalsh@debbiewalshsupervisor.com>
Subject: RE: May 22, 2018 Agenda Item 18.1. GPA 1151, 1152

Dr. Minnella-Romano,

The Clerk of the Board of Supervisors is in receipt of your opposition letter sent via email regarding Item 18.1, and has included it in the record for May 22, 2018.

Sincerely,

Sue Maxwell

Board Assistant
Clerk of the Board of Supervisors
4080 Lemon Street, 1st Floor, Room 127
Riverside, CA 92501
(951) 955-1069 Fax (951) 955-1071
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From: Dr. John L. MINNELLA-Romano [<mailto:drjminnella@yahoo.com>]

Sent: Monday, May 21, 2018 11:48 PM

To: COB-Agenda <COB-Agenda@RIVCO.ORG>; COB <COB@RIVCO.ORG>; Russell Brady <russellb@migcom.com>; Supervisor Jeffries - 1st District <district1@RIVCO.ORG>

Cc: Debbie Walsh <abilene149@gmail.com>; Debbie Walsh <debbiewalsh@debbiewalshsupervisor.com>

Subject: May 22, 2018 Agenda Item 18.1. GPA 1151, 1152

Honorable Supervisors:

The Residents Association of Greater Lake Mathews ("RAGLM") continues to be unanimously and adamantly opposed to Agenda Item 18.1, GPA 1151 and 1152, the Knox Business Park, which is again before you on May 22, 2018.

Our opposition is essentially the same as it was on May 1, 2018, when we addressed you; and for the reasons set forth in the communication today, May 21, 2018, of the Residents Association of Mead Valley ("RAMV") and of their attorneys made separately.

Please do not interpret our possible non-appearance before you on May 22, 2018, as some evidence of a like of interest or support for opposing this ill-considered project. It is just the contrary.

I must also make you aware that RAGLM and our supporters are prepared, albeit reluctantly, to take all necessary legal actions to stop this project because of its serious negative impact on our community. We do not want to see the County spending valuable money but the anticipated negative impact on Greater Lake Mathews compels such an effort to protect us from this step-by-step encroachment and threat to our rural way of life. We implore you to consider carefully your vote on May 22, 2018, and avoid such litigation and cost by denying Board approval.

Cordially and respectfully,

FOR THE BOARD OF DIRECTORS
RESIDENTS ASSOCIATION OF
GREATER LAKE MATHEWS

John L. Minnella

President

JLM:bs

cc: RAMV; Attorney; RAGLM Bd.

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

[signed] Dr. John L. Minnella

Maxwell, Sue

From: Maxwell, Sue
Sent: Wednesday, May 23, 2018 7:50 AM
To: District 4 Supervisor V. Manuel Perez (District4@RIVCO.ORG); District2; District3; District5; Supervisor Jeffries - 1st District (district1@rivco.org)
Subject: May 22 2018 Item 18.1 (7034) - Public Comment Received After Board Meeting Opposing Mead Valley Warehouse (Albia Miller)
Attachments: DC in meade valley 2018.doc

Good morning,

Attached is an opposition letter received via COB with the email below from Ms. Miller, after the Board approved Item 18.1 on May 22, 2018.

This is being forwarded for your information only.

Thank you kindly, and have a great day,

Sue Maxwell

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



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From: Maxwell, Sue
Sent: Wednesday, May 23, 2018 7:33 AM
To: 'albia miller' <openspaceispeace@gmail.com>
Subject: May 22 2018 Item 18.1 (7034) - Public Comment Received After Board Meeting Opposing Mead Valley Warehouse (Albia Miller)

Good morning Ms. Miller,

The Clerk of the Board of Supervisors is in receipt of your opposition letter sent via email regarding approval of the Mead Valley Warehouse/Distribution/Manufacturing building and will include it in the record for May 22, 2018, Item 18.1 (7034) although received after the Board meeting..

Sincerely,

Sue Maxwell

Board Assistant
Clerk of the Board of Supervisors
4080 Lemon Street, 1st Floor, Room 127
Riverside, CA 92501
(951) 955-1069 Fax (951) 955-1071
Mail Stop #1010
smaxwell@rivco.org

5/22/18 18.1
2018-5-13922

<http://rivcoçob.org/>

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From: albia miller [<mailto:openspaceispeace@gmail.com>]

Sent: Tuesday, May 22, 2018 8:36 PM

To: COB <COB@RIVCO.ORG>

Subject:

Dear Ms. Harper-Ilem

I can't believe I came by the day that the Warehouse iMeade Valley was going to be heard. I try to come by and talk and encourage people to become involved in better elected officials and I wasn't reading the agenda correctly. However, once I figured it out I knew what to say as I made a you tube about it.

albia miller

OFFICE OF THE COUNTY CLERK
COUNTY OF RIVERSIDE

Offices of Miller, Catlin, Miller
P.O. Box 1341 Elsinore, California 92531
18.1 7034 TRANSPORTATION & LAND MANAGEMENT AGENCY/PLANNING:
Public Hearing on GENERAL PLAN AMENDMENT NOS. 1151 AND 1152, CHANGE
OF ZONE NOS. 7872 AND 7873, PLOT PLAN NOS. 25837 AND 25838, TENTATIVE
PARCEL MAP NOS. 36950 AND 36962 – EIR00546 – Intent to Certify an EIR -
Applicant: Trammel Crow, Inc. – Representative: David Evans and Associates, Inc. –
First Supervisorial District – Mead Valley Zoning District – Mead Valley Area Plan –
Community Development: Light Industrial (CD:LI), Community Development: Business
Park (CD:BP) - Location: Southerly of Oleander Avenue, northerly of Nance Street,
westerly of Harvill Avenue, and easterly of Day Street - Zoning: Rural Residential, ½
acre minimum (R-R-½), Medium Manufacturing (M-M), Industrial Park (I-P) -

Mead Valley rises up again to oppose another air quality, traffic, and public safety degradation to the health of its citizens because of attacks upon the Environment thru building a Distribution Center.

This 702,645 Square Foot plus Distribution Center will be next to Neighbor hoods and within the vicinity of an elementary school. Children's lungs in the area will be the disposal sites of the pollution emissions from the trucks.

This violates many aspects of the CEQA starting with new knowledge of the green house gases due to the amount of truck emissions that such pick up and travel out will cause. The fumes from employee cars will cause additional pollution. This will slow down traffic on the I-215 and all arterial roads.

This property violates respect to cultural resources because of Indian picturographs in the caves. Where are the Indians protecting they site of known artifacts?

This will tip the balance of acceptable noise pollution when added to the terrible Amazon Distribution Center traffic and trucks from employees and pick up Trucks. There should be enough jobs offered by the current Distribution Centers that this one will stand empty like so many in Moreno Valley.

And all the county of Riverside receives from this DC is more crime, need of more 1st responders and they have just enough money with no profit to pay for this building's needs and definitely not enough to acquire profit for other County Programs and that is why RC County is always cutting back and programs want more and more.

This open space at Day Street and Oleandar is a balance of the over paved areas of March Air Force and this monster Amazon that was Ben Clark that should have stayed a balancing Open Space.

This is another huge Heat Producing Island that will drive rain fronts away. NOAA National Weather Service is starting to recognize scientifically that Southern California has significant effect on sending potential rain storms rising above Southern California and sending them toward the Middle of the USA with perilous flooding and blizzards.

This will further pave over and decrease potential nesting space of the Burrowing Owl a Federally Listed Endangered Species.

In the name of those who have defended the Day Street Property I recommend that you Name this Open Space for Brit Holmstrom and her volunteer work at the Board of Supervisors and retain it as Open Space and I don't want to hear one word about what you are doing for Open Space in this over developed, congested, paved over Riverside County.

We don't need another warehouse distribution Center as too many are empty now.

This is a disservice to the people of Riverside County because of further adding to drying the air and polluting the atmospheric chemistry of the evaporative cycle.

Mr. Jefferies may have negotiated a preservation of the Indian Wells Springs that is the collection for water to drain and recharge the aquifer on he property, however, that is not enough. Preserve the entire poperty for a Historical Monument and Historical Reminder of days when Riverside County flourished with Clean air, great billowing Cumulous Clouds. abundance of Native Vegetation instead of dried fields which we often see, now.

Defending the Earth from these developers has driven up my blood pressure, given me hospitalizations and made many other citizens premature life transition and we will have no more pouring of concrete. Find other jobs than concentrated paving and road asphaltting.

Ms. Miller

Maxwell, Sue

From: Maxwell, Sue
Sent: Friday, May 18, 2018 10:06 AM
To: COB-Agenda (COB-Agenda@rivco.org); George Johnson (GAJohnson@RIVCO.ORG); Leach, Charissa (cleach@RIVCO.ORG); Perez, Juan (JCPEREZ@RIVCO.ORG); Young, Alisa; District 4 Supervisor V. Manuel Perez (District4@RIVCO.ORG); District2; District3; District5; Supervisor Jeffries - 1st District (district1@rivco.org)
Cc: Russell Brady (rbrady@RIVCO.ORG)
Subject: May 22 2018 Board Meeting Item 18.1 (MT 7034) - Public Comment Responses from Planning
Attachments: Memo to BOS - Public Comment Responses w attachments.pdf

Good morning,

The email below and 92-page attachment were received via COB to forward for review prior to the May 22, 2018 Board Meeting, related to Agenda Item 18.1 (MT 7034).

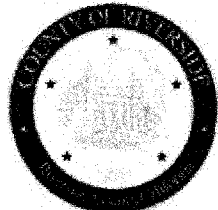
These are responses to Public Comments received from Abigail Smith and John L. Minnella-Romano opposing the proposed warehouse/distribution/manufacturing building in Mead Valley (GPAs 1151 & 1152; CZOs 7872 & 7873; EIR 546) from the May 1, 2018 Board Meeting, Item 18.1.

This has been printed and included with back-up to Agenda Item 18.1 for May 22, 2018.

Thank you kindly,

Sue Maxwell

Board Assistant
Clerk of the Board of Supervisors
4080 Lemon Street, 1st Floor, Room 127
Riverside, CA 92501
(951) 955-1069 Fax (951) 955-1071
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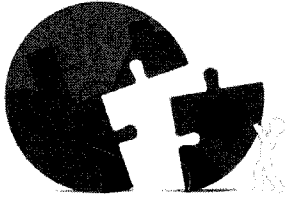
From: Brady, Russell
Sent: Thursday, May 17, 2018 5:01 PM
To: COB <COB@RIVCO.ORG>
Cc: Perez, Juan <JCPEREZ@RIVCO.ORG>; Leach, Charissa <cleach@rivco.org>
Subject: 5/22 Item 18.1

Please provide this memo and attachments to the Supervisors immediately for their review with this item.

Thanks

Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-3025

5/25/18 18.1
2018-5-139699



*Charissa Leach, P.E.
Assistant TLMA Director*

RIVERSIDE COUNTY
PLANNING DEPARTMENT

Memorandum

DATE: May 17, 2018
TO: Board of Supervisors
FROM: Russell Brady, Project Planner
RE: Item 18.1 – Response to Public Comments

Attached are responses to the public comments received prior to the May 1, 2018 Board of Supervisors hearing along with the responses with brackets applied for reference to the responses.

Riverside Office · 4080 Lemon Street, 12th Floor
P.O. Box 1409, Riverside, California 92502-1409
(951) 955-3200 · Fax (951) 955-1811

Desert Office · 77588 El Duna Court, Suite H
Palm Desert, California 92211
(760) 863-8277 · Fax (760) 863-7040

Abigail A. Smith, Esq. – Letter ASE (2)

- ASE (2)-1 Comment is acknowledged.
- ASE (2)-2 At the May 1, 2018 Board of Supervisors hearing, the Board of Supervisors closed the public hearing and continued the item to May 22, 2018.
- ASE (2)-3 The proposed actions on the Project and item are not necessary to list within the agenda posting for the Project. The proposed actions on the FEIR and the remainder of the Project are indicated within the Form 11. Regardless, with the continuance of the Board of Supervisors hearing to May 22, 2108, the County will update the agenda posting to clarify the intent to tentatively certify the FEIR.
- ASE (2)-4 The resolutions and ordinances are not necessary for the Board of Supervisors to act to tentatively approve the General Plan Amendments and Changes of Zone. These will be necessary for the final approvals of the General Plan Amendments and Changes of Zone and will be presented for consideration at that time. The findings necessary to approve the General Plan Amendments and Changes of Zone were included in the Planning Commission staff report, which is included in the package for the Board of Supervisors consideration. Further, the recommended motions specifically provide that the tentative approvals of the General Plan Amendments and Changes of Zone are subject to adoption of the respective resolutions and zoning ordinances.
- In the case of the availability of the CEQA Findings of Fact and Statement of Overriding Considerations, these are necessary for certification of the FEIR and final approvals for the Project, which will be provided prior to or concurrently with the final action on the Project. This exact issue was raised by the petitioner, and summarily rejected by the court, in the case *Residents Against Specific Plan 380 v. County of Riverside* (2017) 9 Cal.App.5th 941, where the Court invalidated the appellant's contention that the findings, MMRP, and statement of overriding considerations needed to be provided for public review during, or prior to, the tentative approval.
- The Project's Plot Plans can be recommended for approval at this time because each Plot Plan includes conditions of approval that require final action on the respective General Plan Amendment and Changes of Zone before any grading or building permits are issued. Refer to PP25838 Conditions of Approval 060-Planning.9 and 080-Planning.8 and PP25837 Conditions of Approval 060-Planning.7 and 080-Planning.9. Further, the recommended motions specifically provide that the Plot Plan approvals are subject to the Conditions of Approval and final approval of the respective General Plan Amendments and Changes of Zone.
- ASE (2)-5 As noted previously in Response to Comment ASE (2)-4, the Plot Plans are able to be approved based on conditions of approval included for each Plot Plan requiring the respective General Plan Amendment and Change of Zone to be finally adopted. Refer

to PP25838 Conditions of Approval 060-Planning.9 and 080-Planning.8 and PP25837 Conditions of Approval 060-Planning.7 and 080-Planning.9. Further, the recommended motions specifically provide that the Plot Plan approvals are subject to the Conditions of Approval and final approval of the respective General Plan Amendments and Changes of Zone. In turn, the General Plan Amendments and Changes of Zone cannot obtain final approval until adoption of the FEIR resolution and final certification of the FEIR. Therefore, no ground disturbance can take place under the Plot Plans until the FEIR is certified and the General Plan Amendments and Changes of Zone receive final approval. The findings necessary for the Plot Plans are included in the Project's Planning Commission staff report.

ASE (2)-6 While improvements and dedications for roads and other improvements are typically associated with tentative parcel maps, the requirements for necessary improvements and dedications for the Project are included on the respective Plot Plans as a guarantee that the improvements will be provided. The difference between the required improvements between the Tentative Parcel Maps and the Plot Plans is that, due to the requirements of subdivisions pursuant to Riverside County Ordinance No. 460 to provide secondary access, the Tentative Parcel Maps were conditioned to require improvements to Ellsworth Street south of the Project site boundary to Markham Street, whereas the Plot Plans, which are not subject to the requirements of Riverside County Ordinance No. 460, are not subject to the requirement to provide secondary access. As such, there are no conditions of approval on the Plot Plans to improve Ellsworth Street south of the Project site to Markham Street. (Refer to Response ASE (2)-10, below, for more information about Ellsworth Street paving to Redwood Drive.) Because the County has determined that Tentative Parcel Maps are not necessary for the Project and that lot line adjustments and/or parcel merges can achieve the same ends, the Tentative Parcel Maps were requested to be withdrawn. The conditions of approval for each Plot Plan and Tentative Parcel Map are included in the Board of Supervisors package to enable a review of what improvements each is conditioned to provide.

ASE (2)-7 The request to withdraw the Tentative Parcel Maps and County staff's updated recommendation is noted in the Form 11, which is available for the public to review and be informed of what is being recommended by County staff for consideration by the Board of Supervisors. As the elected body, the Board of Supervisors must be presented with the recommendation of the Planning Commission for the Board's consideration. This is why the Tentative Parcel Maps are included in the Board of Supervisors package to present the full recommendation of the Planning Commission.

Although the Tentative Parcel Maps were listed as applications being considered as part of the Project, these applications which seek to subdivide land would result in negligible impacts to the physical environment. The primary source of impacts to the environment are from the actual physical development of the site which is achieved

through the Plot Plans as well as the General Plan Amendments and Changes of Zone. Therefore, the exclusion of the Tentative Parcel Maps from consideration does not affect the analysis or conclusions reached in the FEIR. Section 15124 (d)(1)(B) of the State CEQA Guidelines provides that a statement briefly describing the intended uses of the EIR shall include, to the extent that the information is known to the Lead Agency, a list of permits and other approvals required to implement the project. The idea that somehow the change from the listed Tentative Parcel Maps, to lot line adjustments and/or parcel mergers, somehow results in a new significant impact or alters the project description in such a way as to prejudice the EIR's analysis is simply inaccurate.

To achieve a consolidation of land in the case of the Building D site and realignment of existing lot lines in the case of the Building E site, a Parcel Merger and a Lot Line Adjustment can be utilized in lieu of a subdivision. The Building D site currently consists of four parcels that would be processed as a Parcel Merger to consolidate the four parcels into one parcel. The Building E site currently consists of two parcels. The Building E Plot Plan does not propose development of the western end of the two northern parcels. A Lot Line Adjustment would be processed to shift the lot line between the two parcels to align to the boundary of development proposed by the Plot Plan with the first parcel being the on-site area of development and the second parcel being the off-site area not proposed for development. No additional parcels would be created. While the findings included for the Tentative Parcel Maps are still accurate and valid, it actually is clearer that the Parcel Merger and Lot Line Adjustment are the more appropriate applications to achieve the ends of consolidating parcels and adjusting lot lines based simply on what each of these applications is intended to accomplish.

As noted previously that the subdivisions would result in negligible impacts to the physical environment, so would the anticipated Parcel Merger and Lot Line Adjustment that would result in the same end condition as was proposed with the Tentative Parcel Maps. These types of applications are ministerial actions and do not require an action by the Board of Supervisors. If the Board of Supervisors acts to approve the Project, these ministerial applications would be processed subsequently similar to a building permit.

- ASE (2)-8 The conditions of approval are included within the Project's Planning Commission Staff Report as they were revised by the Planning Commission.
- ASE (2)-9 See previous comments that address why revisions are not necessary and why further continuance is not necessary.
- ASE (2)-10 With the requested withdrawal of the Tentative Parcel Maps and County staff's updated recommendation for the Board of Supervisors to not take action on the Tentative Parcel Maps, the conditions requiring secondary access and the paving of

Ellsworth Street/Decker Road to Markham Street would not be implemented if the Board of Supervisors decides to take no action on the Tentative Parcel Maps.

Secondary access is a requirement of the subdivision. So, if the subdivision is not acted on, the requirement for secondary access is not applicable. This is reflected in the conditions of approval for the Tentative Parcel Maps compared to the Plot Plans; the Plot Plans do not require road improvements for Ellsworth Street/Decker Road to extend to Markham Street.

Additionally, since the May 1, 2018 Board of Supervisors hearing, the Board of Supervisors is considering adding a condition on the Plot Plans that would require the Project's developer to pave Ellsworth Street/Decker Road between the southern boundary of the Project site and Redwood Drive, within County right-of-way, for the benefit of the residents on Redwood Drive to more easily access Oleander Avenue. The pavement section would be approximately 20 feet wide and 330 feet long between the southern boundary of the Project site and Redwood Drive.

ASE (2)-11 There is substantial evidence in the County's administrative record to indicate that trucks will not use Decker Road south of Oleander Avenue; thus, it is reasonable for the analysis in the FEIR to assume that no trucks will use Ellsworth Street/Decker Road. Refer to FEIR Response to Comment C-4 and FEIR Response to Comment E-35, and the response to the comment submitted by the Law Offices of Abigail Smith (ASE) to the Planning Commission numbered ASE-9. The continued statements from the commenter are merely conclusory statements with no substantive evidence or facts to support the conclusion that trucks would somehow utilize Ellsworth Street/Decker Road south of Oleander Avenue.

As noted above in Response ASE (2)-10, the Board of Supervisors is considering adding a condition of approval to the Plot Plans to require the Project developer to pave a 20-foot-wide section of Ellsworth Street/Decker Road in County right-of-way between the southern Project boundary and Redwood Drive. This condition would not provide a paved connection to Markham Street that could be seen as a viable path for trucks despite the number of mitigation measures and conditions of approval on the Project that restrict trucks from utilizing this path of travel. Therefore, even with the addition of a condition of approval that would require the paving a 20-foot-wide section of Ellsworth Street/Decker Road to Redwood Drive, it is still reasonable for the FEIR to assume that trucks will not use Ellsworth Street/Decker Road to connect to Markham Street.

ASE (2)-12 The mitigation measure requested by this comment was added to the Project as a condition of approval. All medium- and heavy-duty trucks accessing the Project site will be required to have 2010 or newer engines. As stated in the response to the comment submitted by ASE to the Planning Commission numbered ASE-4, "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 (2)-13 This closing comment is acknowledged.

Law Offices of Abigail Smith

1455 Frazee Road, Suite 500, San Diego, CA 92108

Abigail A. Smith, Esq.
Email: abby@socalceqa.com
Telephone: (951) 506-9925
Facsimile: (951) 506-9975

April 30, 2018

VIA E-MAIL AND U.S. MAIL

Riverside County Board of Supervisors
4080 Lemon Street, 5th Floor
Riverside, CA 92501
cob@rcbos.org
rbrady@rivco.org

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

To the Riverside County Board of Supervisors:

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

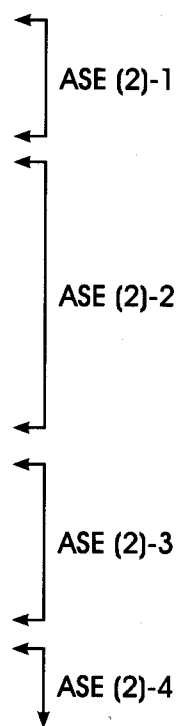
We respectfully submit there are a number of reasons that justify the continuation of Item 18.1 to a future Board of Supervisors meeting.

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

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

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

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



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

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

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

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

Building D

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

Building E

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

¹http://riversidecountyca.iqm2.com/Citizens/Detail_LegiFile.aspx?Frame=&MeetingID=1812&MediaPosition=&ID=6810&CssClass=

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

ASE (2)-4
(cont.)

ASE (2)-5

ASE (2)-6

ASE (2)-7

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

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

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

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

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

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



ASE (2)-7
(cont.)

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

ASE (2)-7
(cont.)

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

ASE (2)-8

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

ASE (2)-9

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

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

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

ASE (2)-10

Both TPMs require that condition.

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

²

http://planning.rctlma.org/Portals/0/devproc/apps/295_1021_LLA_Application_Filing_Instructions_Handout.pdf

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

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

We have previously proposed a number of feasible air quality mitigation measures aimed at reducing significant diesel (NOx) emissions due to the Project. We submit that these measures have not been demonstrated to be infeasible based on substantial evidence in the record, through the Final EIR or the County's responses to our Planning Commission comment letter. In particular, with respect to 2010 trucks, the Final EIR mitigation measure stating that the applicant shall comply with CARB regulations is not tantamount to a requirement that owners/operators commit to trucks equipped with 2010 model year engines at the Project site. The CARB regulation requires the phase-in of 2010 model year trucks by 2023³. "Starting January 1, 2015, the regulation requires accelerated replacements of both lighter and heavier vehicles that do not have PM filters installed. From 2020 to 2023 nearly all older vehicles would need to be upgraded to have exhaust emissions meeting 2010 model year engine emissions levels."⁴ We submit that a *faster* schedule (requiring only 2010 model year engines *presently*) is a feasible mitigation measure which lessens NOx impacts. This measure has been adopted by other similar projects as we have shown. To the extent that the County is proposing alternative mitigation language (*see* RTC ASE-4), we did not see this new language in any documents before the Board.

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

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

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

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

ASE (2)-13

Sincerely,

Abigail Smith

Abigail Smith
Law Offices of Abigail Smith

Enclosure: Exhibits A-C