

Rural Association of Mead Valley – Letter RAMV (2)

RAMV (2)-1 This comment is similar to FEIR Comment E-1 and similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-1; therefore, refer to FEIR Response to Comment E-1 and Response to Comment RAMV-1.

Comment RAMV (2)-1 includes an additional, accurate statement citing the approximate number of truck trips that would be generated by the proposed Project. As shown in Final EIR Table 4.15-14, *Project Trip Generation (Actual Vehicles)*, the Project is calculated to generate 806 daily truck trips.

Comment RAMV (2)-1 also includes an additional assertion that trucks traveling to and from the Project site will travel south on Decker Road to Markham Street to Cajalco Road. There is substantial evidence in the County's administrative record to indicate that trucks will not use that route. 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, which for ease of reference is provided below.

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

RAMV (2)-2 This comment is addressed by FEIR Response to Comment E-88, FEIR Response to Comment K-3, the response to the comment submitted by Blum Collins LLP (BC) to the Planning Commission numbered BC-12, and the response to the comment submitted by ASE to the Planning Commission numbered ASE-16. Refer to the FEIR for Responses to Comments E-88 and K-3. For ease of reference, the Responses to Comments BC-12 and ASE-16 are provided below.

Response to Comment BC-12 states: The Riverside County General Plan designates the Project site and lands to the north and east for Community Development uses, which are intended for urban and suburban development (Riverside County General Plan, Chapter 3, Land Use). Lands to the west and the south are designated by the General Plan for Rural Community uses, which are intended for rural development (Riverside County General Plan, Chapter 3, Land Use). In order to induce unplanned growth to the west or to south of the Project site on properties in the Rural Community Foundation Component area, the County would need to consider and approve a Foundation Component General Plan Amendment, which under the County's Municipal Code (Riverside County Ordinance No. 348.4835 (B)), "Limitations on Foundation Component Amendments" states "...no Foundation Component Amendment shall be heard or approved except as part of the Eight-Year General Plan

Review Cycle. The first Eight-Year General Plan Review Cycle shall commence on January 1, 2008 and continue during the 2008 calendar year, and subsequent cycles shall occur at eight calendar year intervals thereafter.” The last filing period for such amendment requests closed in June 2016, and the next cycle will not commence again until at least 2024. All Foundation Component Amendment requests are considered by a General Plan Advisory Committee (“GPAC”), the Planning Commission, and the County’s Board of Supervisors, and are deliberated upon in depth by all three bodies. There is substantial evidence in the FEIR and the Project’s administrative record to indicate that the Project would act as a physical demarcation between the Community Development and Rural Community Foundation Component areas in this portion of Mead Valley.

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

- RAMV (2)-3 Comment acknowledged. This comment does not raise any issues as it relates to the proposed Project or its physical environmental impacts and no further response is necessary.
- RAMV (2)-4 This comment is verbatim to FEIR Comment E-2 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-2; therefore, refer to FEIR Response to Comment E-2 and Response to Comment RAMV-2.
- RAMV (2)-5 This comment is similar to FEIR Comment E-3, and the comments submitted by RAMV to the Planning Commission numbered RAMV-3 and RAMV-23; therefore, refer to FEIR Response to Comment E-3 and Response to Comments RAMV-3 and RAMV-23.
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Comment RAMV (2)-5 clarifies the word “substantial” used in previous Comment RAMV-3 with the words “(1,000 ft).” This overall comment was previously addressed through FEIR Response to Comment E-3 and Response to Comment RAMV-3; therefore, refer to FEIR Response to Comment E-3 and Response to Comment RAMV-3.

Compared to previous similar comments, Comment RAMV (2)-5 adds the words, “off-site parking, prostitution, and increased crime” to the sentence asserting that the Business Park Alternative would reduce such effects of the Project. The comment regarding off-site parking is addressed by Response to Comment RAMV-39 Bullet Point 4. There is absolutely no evidence in this comment or in the administrative record for the Project to indicate that increased prostitution or crime would occur. To the contrary, there is no connection between the proposed Project and alleged crime and prostitution. The Project is intended to help the County alleviate crime and other illegal activities by injecting additional economic activity into the Mead Valley area.

- RAMV (2)-6 This comment makes a general statement about the Project’s conditions of approval and staff report to the Board of Supervisors and does not indicate any specific errors or omissions. The County disagrees with the commenter’s unsupported statement that there are so many errors or inconsistencies in the staff report “that makes it impossible to understand what is really being proposed.” Riverside County Ordinance No. 460 regulates the division of land. The Project will require a parcel merger for the Building D site and a lot line adjustment for the Building E site and will not require either a tract map subdivision or a parcel map subdivision as defined in Ordinance No. 460 to accomplish the respective consolidation of lots and adjustment to existing lot lines that the Tentative Parcel Maps proposed. As stated in Ordinance No. 460, Section 2.1, “General Definitions,” “Lot Line Adjustment means a minor alteration to adjust a lot line or lot lines. It is not a subdivision or re-subdivision procedure and is intended to be used only in those situations where the provisions of the Subdivision Map Act and this ordinance applicable to subdivision and re-subdivisions do not apply.”
- RAMV (2)-7 This comment quotes and paraphrases statements from the Riverside County Planning Department’s staff report to the Board of Supervisors published for the May 1, 2018 Board of Supervisors hearing. Refer to Response to Comment RAMV (2)-1.
- RAMV (2)-8 Refer to Response to Comment RAMV (2)-6. The Riverside County Planning Department is recommending that the Board of Supervisors not approve the Parcel Maps for Building D and Building E (Parcel Map Nos. 36950 and 36962), because parcel maps are not required for the Project under County Ordinance No. 460. Instead, a parcel merger for the Building D site and a lot line adjustment for the Building E site are required as explained in Response to Comment RAMV (2)-6 and in the Planning Department’s staff report to the Board of Supervisors published for the May 1, 2018 Board of Supervisors hearing.

- RAMV (2)-9 This comment quotes a condition of approval for Parcel Map 36950, which the Planning Department is recommending that the Board of Supervisors not approve.
- RAMV (2)-10 This comment is similar to the comments submitted by RAMV on the FEIR, numbered E-8, E-16, E-11, E-33, E-34, E-44, E-45, E-63, E-69, E-80, and E-84, and the comment submitted by RAMV to the Planning Commission numbered RAMV-33. Therefore, please refer to the responses to those comments. In addition, and in response to the statement regarding vehicle idling, refer to the responses to the comments submitted by RAMV to the Planning Commission numbered RAMV-8, RAMV-19, RAMV-69, RAMV-70, RAMV-80, RAMV-81, RAMV-99, RAMV-106, RAMV-117.
- RAMV (2)-11 This comment quotes statements from a Press Enterprise article published in December 2016 about specific code enforcement issues in the City of Riverside. The Knox Business Park Buildings D and E are proposed in unincorporated Riverside County, which is a different jurisdiction, with different code enforcement practices. The comment does not raise any issues related to physical environmental impacts under CEQA and no further response is necessary.
- RAMV (2)-12 This comment is similar to the comments submitted by RAMV on the FEIR numbered E-3 and E-25, and comments RAMV submitted to the Planning Commission numbered RAMV-3 and RAMV-60; therefore, refer to FEIR Responses to Comment E-3 and E-25 and Response to Comments RAMV-3 and RAMV-60.
- RAMV (2)-13 The FEIR's mitigation measure for burrowing owls and requirements under the Federal Migratory Bird Treaty Act (MBTA) are required as conditions of approval on Plot Plan No. 25837 and Plot Plan No. 25838 (see condition of approval 60.Planning-EPD.1 for PP 25837 and PP 25838 and condition of approval 60.Planning-EPD.2 for PP 25837 and PP 25838). The referenced stricken condition of approval relates to Parcel Map Nos. 36950 and 36962. The Riverside County Planning Department is recommending that the Board of Supervisors not approve the Parcel Maps for Building D and Building E (Parcel Map Nos. 36950 and 36962), because parcel maps are not required for the Project under County Ordinance No. 460. Therefore, all conditions of approval related to the parcel maps are recommended to be stricken. Regardless, the conditions remain on the Plot Plans as noted above. The FEIR's required mitigation measure for burrowing owls, and all other mitigation measures specified in the FEIR, will still apply to Plot Plan Nos. 25837 and 25838. The Plot Plan conditions of approval related to environmental mitigation are substantively equivalent to the stricken Parcel Map conditions of approval. Implementation of the mitigation for burrowing owls will be triggered prior to the issuance of a grading permit or building permit. Lastly, for the commenter's benefit, the MBTA is a federal law and any applicant or local jurisdiction would be required to comply with the law; therefore, compliance with the MBTA cannot be "stricken out" by an applicant or a lead agency.

- RAMV (2)-14 This comment is similar to comments submitted by RAMV on the FEIR, numbered E-57 and E-59 and comments submitted by RAMV to the Planning Commission numbered RAMV-93 and RAMV-95; therefore, refer to Response to Comments E-57, E-59, RAMV-93, RAMV-95. FEIR Response to Comments C-37 and C-40 also address burrowing owl. Again, all required mitigation and statutory requirements related to the protection of burrowing owls will be enforced and impacts to such species will remain less than significant.
- RAMV (2)-15 The comment letter from RAMV addressed to the Planning Commission, signed by Debbie Walsh, and dated April 3, 2018, is included in the Project's administrative record via the Planning Commission memos that also are part of the Board of Supervisors package. This letter was supplied to the Planning Commission as part of the deliberation proceedings at the April 4, 2018 Planning Commission hearing.
- In regards to the assertion that trucks will travel on Decker Road, refer to Response to Comment RAMV (2)-1.
- In regards to the statement about homes in the vicinity of the Project site, the County acknowledges the presence of all existing residential structures. FEIR Subsection 2.5.1 states that the Building D Site contains a mobile home (FEIR p. 2-9). In addition, FEIR Figure 4.11-2, "Noise Receiver Locations" shows the measured distances from the Project site to some of the nearby residential structures including the structure near the intersection of Harvill Avenue and Oleander Avenue referenced in this comment. The homes referenced in this comment near Cajalco Road are located more than 1.25 miles south of the Project site.
- RAMV (2)-16 This comment is similar to the comment submitted by RAMV on the FEIR numbered E-68 and the comment submitted by RAMV to the Planning Commission numbered RAMV-105. Therefore, refer to FEIR Response to Comment E-68 and Response to Comment RAMV-105.
- RAMV (2)-17 This comment regarding minimizing sensitive receptor exposure to diesel emissions is similar to the comments submitted by RAMV to the Planning Commission numbered RAMV-26, RAMV-27, RAMV-38 through RAMV-57, RAMV-63, RAMV-65, RAMV-66, RAMV-69, RAMV-98, RAMV-109, and RAMV-116; therefore, please refer to the responses to those comments. As specified in Final EIR Mitigation Measure MM 4.3-11, no diesel-fueled yard trucks will be permitted on the Project site. Exhibits that show the physical relationship/buffer from the Project site to off-site properties to the south, which is wider than the 35 feet asserted in this comment, are shown in the FEIR following Response to Comment E-91 (FEIR pp. FEIR-216 and 217). As disclosed in the FEIR, the Project would not pose a significant health risk associated with diesel particulate matter (DPM) to sensitive receptors in the Project vicinity (refer to EIR § 4.3, Air Quality). Therefore, a wider buffer is not necessary to alleviate any significant and unavoidable impacts of the Project. The operational characteristics of

- RAMV (2)-18 A condition of approval is imposed on the Project that prohibits refrigerated warehouse space. Regarding refrigeration, this comment is similar to the comments submitted by RAMV to the Planning Commission numbered RAMV-39, RAMV-48, RAMV-57, and RAMV-97, therefore, please refer to the responses to these comments. Regarding the statement about vehicle idling, refer to Response to Comment RAMV (2)-10.
- RAMV (2)-19 The statement in this comment regarding the number of trucks trips and the truck routes is similar to RAMV Comment RAMV (2)-1; therefore, refer to Response to Comment RAMV (2)-1 above. The statement in this comment noting S curves and K-rail is similar to the RAMV comment submitted to the Planning Commission, numbered RAMV-73; therefore, refer to Response to Comment RAMV-73. The statement in this comment is similar to the RAMV (2)-1 comment regarding the potential for trucks to use Decker Road; therefore, refer to RAMV (2)-1 above. As stated throughout the responses, there is no substantive evidence or support provided, aside from opinion and conjecture, to support the argument that trucks would utilize other residential routes and ignore the direct route to the freeway.
- RAMV (2)-20 Regarding the statements in this comment related to vehicle idling and truck travel and parking on Decker Road, refer to Responses to Comments RAMV (2)-1 and RAMV (2)-10. Regarding the statement in this comment regarding prostitution, refer to Response to Comment RAMV (2)-5. Riverside County's laws and regulations are enforced by the County's Code Enforcement Division. There is no evidence in the record to support the statement that this project would result in increased crime, dirt fields becoming "truck parking lots," or that prostitutes will now occupy the area "24-7" as stated by the commenter.
- RAMV (2)-21 The statement in this comment regarding idling is addressed in Final EIR Response to Comment C1(6) and above in Response to Comment RAMV (2)-10 and in the response to a comment RAMV submitted to the Planning Commission numbered RAMV-39, Bullet Point 6. Please refer to the responses to those comments. As stated, diesel-fueled vehicles at the Project site are required to comply with the California Air Resources Board (CARB) idling restriction requirements, which currently restrict vehicles from idling for more than 5 minutes. As best practice measures and in an effort to further reduce idling, Mitigation Measures MM 4.3-2(A) and MM 4.3-4 (FEIR p. 4.3-38) are included in the FEIR to require signs to be posted on the site which specify that trucks shall not idle by more than 3 minutes (instead of 5 minutes). Compliance with the CARB requirement is mandatory by State law and citations are issued for non-compliance. Enforcement of all laws, however, cannot be assured 100% of the time; for example, the posting of speed limit signs does not ensure that everyone will drive at or below the speed limit. Although compliance signs will be posted at the Project site specifying a 3-minute idling limit, the Project's Air Quality and Health Risk Assessment Reports (FEIR *Technical Appendices B1 and B2*) calculated impacts assuming 15 minutes of idling. Thus, the FEIR adequately disclosed a reasonably expected, and likely overstated, level of impact. FEIR

Mitigation Measures MM 4.3-3, 4.3-4, 4.3-5, 4.3-6, 4.3-7, 4.3-10, and 4.3-11 (FEIR pp. 4.3-38 and 4.3-39) address the reduction of air pollutant emissions associated with tailpipe emissions during the Project's construction and operation. Further, 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." Still further, the Project is required to comply with the California Green Building Standards Code (CALGreen), which requires among many other items the installation of EV charging stations for passenger cars and the provision of bicycle parking spaces and preferred parking spots for clean air and carpool vehicles.

Regarding electric heavy-duty trucks, refer to the response to the comment submitted to the Planning Commission by ASE numbered ASE-4 Bullet Points (2) and (3). In summary, technology is emerging for both electric-powered and hydrogen fuel cell-powered heavy-duty vehicles, and it is not yet known with any certainty what types of zero-emission heavy-duty vehicles, either electric, hydrogen fuel cell, or other, will be widely available in the future. As acknowledged by the International Council on Clean Transportation (ICCT) in a report titled "Transitioning to Zero-Emission Heavy Duty Freight Vehicles," all of the heavy-duty vehicle technologies analyzed by the ICCT world-wide are "... in research, exploratory, and in early demonstration phases" (ICCT, September 2017, p. 33)¹. Because these technologies are still in research, exploratory, demonstration phase and new technologies may emerge, there is no assurance that any requirements that may be imposed on the Project by Riverside County related to the zero-emission heavy-duty vehicle technologies in their early stages of development have the capability of actually being used in the future. Requiring the Project to make a substantial investment to install electric heavy-duty truck infrastructure on the Project site with no reasonable assurance that this specific technology will actually be the one to emerge into widespread use is not required under CEQA, as mitigation must be feasible.

Regarding the statement in this comment regarding the WRCOG Good Neighbor Policy, this statement is similar to FEIR Comment C-66 and FEIR Comment E-31; therefore, refer to FEIR Responses to Comment C-66 and E-31. Regarding the statement in this comment regarding 191 feet, refer to FEIR Response to Comment C-23 and exhibits provided in the FEIR following Response to Comment E-91 that illustrate the physical relationship/buffer from the Project site to off-site properties to the south (FEIR pp. FEIR-216 and 217). Also refer to Response to Comment RAMV (2)-17, above.

¹ https://www.theicct.org/sites/default/files/publications/Zero-emission-freight-trucks_ICCT-white-paper_26092017_vF.pdf

- RAMV (2)-22 Refer to Response to Comment RAMV (2)-21. A condition of approval is imposed on the Project that prohibits refrigerated warehouse space; therefore, transport refrigeration units (TRUs) would not access the Project site and Figure 1-1 cited in this comment is irrelevant. As concluded by Final EIR Subsection 4.3, "Air Quality," the Project would result in less-than-significant human health risks due to diesel particulate matter.
- RAMV (2)-23 This comment summarizes and restates comments presented in Comments RAMV (2)-1, RAMV (2)-5, RAMV (2)-17, RAMV (2)-20, and RAMV (2)-21; therefore, please refer to the responses to those comments.
- RAMV (2)-24 This comment is similar the comments RAMV submitted to the Planning Commission numbered RAMV-2 through RAMV-6; therefore, refer to Response to Comments RAMV-2 through RAMV-6.
- RAMV (2)-25 This comment is verbatim to FEIR Comment E-4 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-4; therefore, refer to FEIR Response to Comment E-4 and Response to Comment RAMV-4.
- RAMV (2)-26 This comment is similar to FEIR Comment E-5 and the comment submitted by RAMV to the Planning Commission numbered RAMV-5; therefore, refer to FEIR Response to Comment E-5 and Response to Comment RAMV-5. Comment RAMV (2)-26 also includes a snapshot from the General Plan Land Use Map. Refer to FEIR Figure 3-4 and FEIR Figure 3-11 (FEIR pp. 3-8 and 3-17), which show that the Project site is located on land currently designated by the Riverside County General Plan as Community Development-Light Industrial (CD-LI) and Community Development-Business Park (CD-BP). The proposed Project is consistent with the General Plan's vision to develop employment-generating uses on the Project site.
- RAMV (2)-27 This comment is verbatim to FEIR Comment E-6 and the comment submitted by RAMV to the Planning Commission numbered RAMV-6; therefore, refer to FEIR Response to Comment E-6 and Response to Comment RAMV-6.
- RAMV (2)-28 This comment is verbatim to FEIR Comment E-7 and the comment submitted by RAMV to the Planning Commission numbered RAMV-7; therefore, refer to FEIR Response to Comment E-7 and Response to Comment RAMV-7.
- RAMV (2)-29 This comment is verbatim to FEIR Comment E-8 and RAMV-8; therefore, refer to FEIR Response to Comment E-8 and Response to Comment RAMV-8.
- RAMV (2)-30 This comment is similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-9; therefore, refer to Response to Comment RAMV-9 and the responses referenced therein, which include FEIR Responses to Comments E-10, E-20, E-54, E-57, E-78, G-5 and K-25.

Comment RAMV (2)-30 adds an additional statement regarding the construction of several warehouse in the Project's vicinity between Markham and Cajalco Road. As

stated in Response to Comment RAMV-9, the FEIR considered 103 past, present, and reasonably foreseeable projects in the vicinity. Refer to FEIR Table 4.0-1, *Cumulative Development Land Use Summary*. The cumulative project labeled “RC-1; Majestic Freeway Business Center” is located north of Cajalco Road, which was approved by Riverside County in 2005 for industrial development.

- RAMV (2)-31 This comment is similar to FEIR Comment E-9 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-10; therefore, refer to FEIR Response to Comment E-9 and Response to Comment RAMV-10.
- RAMV (2)-32 This comment is similar to FEIR Comment E-10 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-11; therefore, refer to FEIR Response to Comment E-10 and Response to Comment RAMV-11
- RAMV (2)-33 This comment is similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-12; therefore, refer to Response to Comment RAMV-12. Comment RAMV (2)-33 adds the words “x Nandina” for clarification as in, “one very large warehouse was just completed north of Harley Knox x Nandina.” This locational clarification does not require a revised response.
- RAMV (2)-34 This comment is similar to FEIR Comment E-11 and similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-13; therefore, refer to FEIR Response to Comment E-11 and Response to Comment RAMV-13. Comment RAMV (2)-34 adds an additional statement commenting on the air pollution created by idling trucks. The additional statement regarding idling is addressed above in RAMV (2)-10, RAMV (2)-18, RAMV (2)-20 and RAMV (2)-21.
- RAMV (2)-35 This comment is verbatim to FEIR Comment E-12 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-14; therefore, refer to FEIR Response to Comment E-12 and Response to Comment RAMV-14.
- RAMV (2)-36 This comment is similar to FEIR Comment E-13 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-15; therefore, refer to FEIR Response to Comment E-13 and Response to Comment RAMV-15.
- RAMV (2)-37 This comment is similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-16 with the exception that the commenter changed the word “comments” to “states” as in, “the EIR states...”. Refer to Response to Comment RAMV-16.
- RAMV (2)-38 This comment is similar to FEIR Comment E-14 and to the comment submitted by RAMV to the Planning Commission numbered RAMV-17; therefore, refer to FEIR Response to Comment E-14 and Response to Comment RAMV-17. Comment RAMV (2)-38 adds a statement that traffic backs up to Nuevo Road going north all the way to Orange County going south on the I-215. The FEIR acknowledges the traffic conditions on the State Highway System, including I-215, and concludes that the addition of Project traffic would result in a significant and unavoidable cumulatively
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considerable impact to State Highway System facilities because there is no established mitigation fee program established by Caltrans or other governmental agency to address this impact and neither the County nor the Project applicant have the ability or authority to perform roadway improvements to State Highway System facilities.

- RAMV (2)-39 This comment is similar to FEIR Comment C-96, FEIR Comment E-15 and similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-18; therefore, refer to Response to FEIR Comments C-96 and E-15 and Response to Comment RAMV-18. Comment RAMV (2)-39 adds an additional statement that trucks are still backing up along Harvill Avenue. The County has evidence in the Project's administrative record in the form of photographs dated August 15, 2017, September 12, 2017, and February 2, 2018, which show that the stacking issue was no longer occurring on Harvill Avenue. Further, the Project Applicant presented photographs of Harvill Avenue in its presentation to the Board of Supervisors at its May 1, 2018 hearing showing that no trucks were stacking at the times and dates the photographs were taken in 2018. Regardless, Comment RAMV (2)-29 relates to the operational conditions of another project and not the proposed Project.
- RAMV (2)-40 This comment is similar to FEIR Comment E-16 and similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-19; therefore, refer to FEIR Response to Comment E-16 and Response to Comment RAMV-19. Comment RAMV (2)-40 includes an additional statement regarding multiple tenants and the need for adequate entrance room. This additional statement is similar to the comment submitted by RAMV on the FEIR numbered E-11 and to the Planning Commission numbered RAMV-13 and FEIR Response to Comment C-96. Therefore, refer also to FEIR Response to Comments C-96 and E-11 and Response to Comment RAMV-13.
- RAMV (2)-41 This comment is similar to FEIR Comment E-17 and similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-20, with the exception that the comment now includes the words, "vacant lots", as in, the EIR does not mention trucks idling on local roads and vacant lots. The addition of the words "vacant lots" does not require any revision of Response to FEIR Comment E-17 and Response to Comment RAMV-40.
- RAMV (2)-42 This comment is verbatim to FEIR Comment E-18 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-21; therefore, refer to FEIR Response to Comment E-18 and Response to RAMV-21.
- RAMV (2)-43 This comment is verbatim to FEIR Comment E-19 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-22; therefore, refer to FEIR Response to Comment E-19 and Response to RAMV-22.
- RAMV (2)-44 This comment is similar to FEIR Comment E-20 and similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-23; therefore,

- refer to FEIR Response to Comment E-20 and Response to Comment RAMV-23. Comment RAMV (2)-44 redacts the phrase regarding homeless camps. No additional response is required due to the commenter's redaction of "homeless camps."
- RAMV (2)-45 This comment is verbatim to FEIR Comment E-21 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-24; therefore, refer to FEIR Response to Comment E-21 and Response to RAMV-24.
- RAMV (2)-46 This comment is similar to FEIR Comment E-22 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-25; therefore, refer to FEIR Response to Comment E-22 and Response to Comment RAMV-25.
- RAMV (2)-47 This comment is verbatim to FEIR Comment E-23 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-26; therefore, refer to FEIR Response to Comment E-23 and Response to Comment RAMV-26.
- RAMV (2)-48 This comment is verbatim to FEIR Comment E-24 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-27; therefore, refer to FEIR Response to Comment E-24 and Response to Comment RAMV-27.
- RAMV (2)-49 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-28; therefore, refer to Response to Comment RAMV-28.
- RAMV (2)-50 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-29; therefore, refer to Response to Comment RAMV-29.
- RAMV (2)-51 This comment is similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-30; therefore, refer to Response to Comment RAMV-30. Comment RAMV (2)-51 adds the additional words, "allowing for" and "24-7" as in "(allowing for loud noise, light trespass, dust, air pollution, traffic, 24-7)". The addition of these words does not require a revision to Response to Comment RAMV-30.
- RAMV (2)-52 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-31; therefore, refer to Response to Comment RAMV-31.
- RAMV (2)-53 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-32; therefore, refer to Response to Comment RAMV-32.
- RAMV (2)-54 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-33; therefore, refer to Response to Comment RAMV-33.
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- RAMV (2)-55 This comment is verbatim to the comments submitted by RAMV to the Planning Commission numbered RAMV-34 and RAMV-35; therefore, refer to Response to Comments RAMV-34 and RAMV-35.
- RAMV (2)-56 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-36; therefore, refer to Response to Comment RAMV-36.
- RAMV (2)-57 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-37; therefore, refer to Response to Comment RAMV-37.
- RAMV (2)-58 This comment is similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-38, with the exception that the comment adds a statement that the project contradicts the General Plan and Mead Valley Healthy Communities Element. This additional statement is reflective of what was already said in Comment RAMV-38; therefore, refer to Response to Comment RAMV-38.
- RAMV (2)-59 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-39; therefore, refer to Response to Comment RAMV-39.
- RAMV (2)-60 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-40; therefore, refer to Response to Comment RAMV-40.
- RAMV (2)-61 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-41; therefore, refer to Response to Comment RAMV-41.
- RAMV (2)-62 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-42; therefore, refer to Response to Comment RAMV-42.
- RAMV (2)-63 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-43; therefore, refer to Response to Comment RAMV-43.
- RAMV (2)-64 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-44; therefore, refer to Response to Comment RAMV-44.
- RAMV (2)-65 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-45; therefore, refer to Response to Comment RAMV-45.

- RAMV (2)-66 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-46; therefore, refer to Response to Comment RAMV-46.
- RAMV (2)-67 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-47; therefore, refer to Response to Comment RAMV-47.
- RAMV (2)-68 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-48; therefore, refer to Response to Comment RAMV-48.
- RAMV (2)-69 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-49; therefore, refer to Response to Comment RAMV-49.
- RAMV (2)-70 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-50; therefore, refer to Response to Comment RAMV-50.
- RAMV (2)-71 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-51; therefore, refer to Response to Comment RAMV-51.
- RAMV (2)-72 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-52; therefore, refer to Response to Comment RAMV-52.
- RAMV (2)-73 This comment is similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-53, with the exception that the words "Not happening: were revised to, "This is not happening". This revision does not require a revision to Response to Comment RAMV-53. Therefore, refer to Response to Comment RAMV-53.
- RAMV (2)-74 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-54; therefore, refer to Response to Comment RAMV-54.
- RAMV (2)-75 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-55; therefore, refer to Response to Comment RAMV-55.
- RAMV (2)-76 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-56; therefore, refer to Response to Comment RAMV-56.

- RAMV (2)-77 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-57; therefore, refer to Response to Comment RAMV-57.
- RAMV (2)-78 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-58; therefore, refer to Response to Comment RAMV-58.
- RAMV (2)-79 This comment is similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-59; with the exception that paragraphs regarding trails were redacted. The redaction of the paragraphs does not require any additional response beyond Response to Comment RAMV-59; therefore, refer to Response to Comment RAMV-59.
- RAMV (2)-80 The first sentence of this comment is verbatim to the sentence in the comment submitted by RAMV to the Planning Commission numbered RAMV-59; therefore, refer to Response to Comment RAMV-59. Regarding the second statement regarding a runoff issue at the intersection of Decker Road and Markham Street, this location is approximately 0.3-mile south of the Project site and the Project will have no impact at this off-site location. As addressed in FEIR § 4.9, *Hydrology and Water Quality*, an on-site storm water drainage system is proposed to be installed on the Project site to collect, treat, detain, and release storm water in a manner that results in less-than-significant impacts. None of the Project's storm water will surface flow to the south toward the intersection of Decker Road and Markham Street.
- RAMV (2)-81 This comment is verbatim to FEIR Comment E-25 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-60; therefore, refer to FEIR Response to Comment E-25 and Response to Comment RAMV-60.
- RAMV (2)-82 This comment is verbatim to FEIR Comment E-26 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-61; therefore, refer to FEIR Response to Comment E-26 and Response to Comment RAMV-61.
- RAMV (2)-83 This comment is verbatim to FEIR Comment E-27 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-62; therefore, refer to FEIR Response to Comment E-27 and Response to Comment RAMV-62.
- RAMV (2)-84 This comment is verbatim to FEIR Comment E-28 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-63; therefore, refer to FEIR Response to Comment E-28 and Response to Comment RAMV-63.
- RAMV (2)-85 This comment is verbatim to FEIR Comment E-29 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-64; therefore, refer to FEIR Response to Comment E-29 and Response to RAMV-64.

- RAMV (2)-86 This comment is verbatim to FEIR Comment E-30 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-65; therefore, refer to FEIR Response to Comment E-30 and Response to Comment RAMV-65.
- RAMV (2)-87 This comment is verbatim to FEIR Comment E-31 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-66; therefore, refer to FEIR Response to Comment E-31 and Response to Comment RAMV-66.
- RAMV (2)-88 This comment is verbatim to FEIR Comment E-32 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-67; therefore, refer to FEIR Response to Comment E-32 and Response to Comment RAMV-67.
- RAMV (2)-89 This comment is similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-68; therefore, refer to Response to Comment RAMV-68. Comment RAMV (2)-89 has an additional statement regarding indirect impacts to wildlife associated with construction activities including blasting. Refer to FEIR Response to Comment C-37 for a response to this comment. Blasting is addressed as an inherent part of the Project's construction characteristics throughout the FEIR and also in FEIR Response to Comments C-6, C-26, C-37, C-40, C-59, C-70, C-72, C-73, C-74, C-75, E-32, E-56, K-10, K-51, K-52, K-66,
- RAMV (2)-90 This comment is verbatim to FEIR Comment E-33 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-69; therefore, refer to Response to Comment E-33 and Response to Comment RAMV-69.
- RAMV (2)-91 This comment is verbatim to FEIR Comment E-34 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-70; therefore, refer to Response to Comment E-34 and Response to Comment RAMV-70.
- RAMV (2)-92 This comment is similar to FEIR Comment E-35 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-71; therefore, refer to FEIR Response to Comment E-35 and Response to Comment RAMV-71.
- RAMV (2)-93 This comment is verbatim to FEIR Comment E-36 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-72; therefore, refer to FEIR Response to Comment E-36 and Response to Comment RAMV-72.
- RAMV (2)-94 This comment is verbatim to FEIR Comment E-37 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-73; therefore, refer to FEIR Response to Comment E-37 and Response to Comment RAMV-73.
- RAMV (2)-95 This comment is similar to FEIR Comment E-38 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-74; therefore, refer to FEIR Response to Comment E-38 and Response to Comment RAMV-74.
- RAMV (2)-96 This comment is similar to FEIR Comment E-39 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-75; therefore,
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- refer to FEIR Response to Comment E-39 and Response to Comment RAMV-75.
- RAMV (2)-97 This comment is verbatim to FEIR Comment E-40 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-76; therefore, refer to Response to Comment E-40 and Response to Comment RAMV-76.
- RAMV (2)-98 This comment is similar to FEIR Comment E-41 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-77; therefore, refer to FEIR Response to Comment E-41 and Response to Comment RAMV-77.
- RAMV (2)-99 This comment is similar to FEIR Comment E-42 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-78; therefore, refer to FEIR Response to Comment E-42 and Response to Comment RAMV-78.
- RAMV (2)-100 This comment is similar to FEIR Comment E-43 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-79; therefore, refer to FEIR Response to Comment E-43 and Response to Comment RAMV-79.
- RAMV (2)-101 This comment is verbatim to FEIR Comment E-44 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-80; therefore, refer to FEIR Response to Comment E-44 and Response to Comment RAMV-80.
- RAMV (2)-102 This comment is verbatim to FEIR Comment E-45 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-81; therefore, refer to FEIR Response to Comment E-45 and Response to Comment RAMV-81.
- RAMV (2)-103 This comment is verbatim to FEIR Comment E-46 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-82; therefore, refer to FEIR Response to Comment E-46 and Response to Comment RAMV-82.
- RAMV (2)-104 This comment is similar to FEIR Comment E-47 and similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-83; therefore, refer to Response to Comment RAMV-83. Comment RAMV (2)-104 adds the addition of a phrase that comments on buffer measurements; refer to Response to Comment RAMV (2)-17, above, which addresses the interface between the Project site and off-site property to the south.
- RAMV (2)-105 This comment is verbatim to FEIR Comment E-48 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-84; therefore, refer to FEIR Response to Comment E-48 and Response to Comment RAMV-84.
- RAMV (2)-106 This comment is verbatim to FEIR Comment E-49 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-85; therefore, refer to FEIR Response to Comment E-49 and Response to Comment RAMV-85.
- RAMV (2)-107 This comment is verbatim to FEIR Comment E-50 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-86; therefore,
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- refer to FEIR Response to Comment E-50 and Response to Comment RAMV-86.
- RAMV (2)-108 This comment is similar to FEIR Comment E-51 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-87; therefore, refer to FEIR Response to Comment E-51 and Response to Comment RAMV-87.
- RAMV (2)-109 This comment is verbatim to FEIR Comment E-52 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-88; therefore, refer to FEIR Response to Comment E-52 and Response to Comment RAMV-88.
- RAMV (2)-110 This comment is verbatim to FEIR Comment E-53 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-89; therefore, refer to FEIR Response to Comment E-53 and Response to Comment RAMV-89.
- RAMV (2)-111 This comment is similar to FEIR Comment E-54 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-90; therefore, refer to FEIR Response to Comment E-54 and Response to Comment RAMV-90.
- RAMV (2)-112 This comment is verbatim to FEIR Comment E-55 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-91; therefore, refer to FEIR Response to Comment E-55 and Response to comment RAMV-91.
- RAMV (2)-113 This comment is verbatim to FEIR Comment E-56 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-92; therefore, refer to FEIR Response to Comment E-56 and Response to Comment RAMV-92.
- RAMV (2)-114 This comment is verbatim to FEIR Comment E-57 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-93; therefore, refer to FEIR Response to Comment E-57 and Response to Comment RAMV-93.
- RAMV (2)-115 This comment is verbatim to FEIR Comment E-58 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-94; therefore, refer to FEIR Response to Comment E-58 and Response to Comment RAMV-94.
- RAMV (2)-116 This comment is similar to FEIR Comment E-59 and similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-95; therefore, refer to FEIR Response to Comment E-59 and Response to Comment RAMV-95. This comment added the words “and construction” as in, rock blasting and construction impacts on burrowing owls....” This comment also added the words, “on the site of this Project,” as in, “burrowing owls...live on the ground on the site of this Project.” The added words do not require an additional response beyond FEIR Response to Comment E-59 and Response to Comment RAMV-95.
- RAMV (2)-117 This comment is similar to FEIR Comment E-60 and similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-96; therefore, refer to FEIR Response to Comment E-60 and Response to Comment RAMV-96. Comment RAMV (2)-117 adds dust as a concern for high cube warehouse
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construction. The generation of particulate matter (dust) during the Project's construction is fully addressed in FEIR § 4.3, *Air Quality*.

- RAMV (2)-118 This comment is verbatim to FEIR Comment E-61 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-97; therefore, refer to FEIR Response to Comment E-61 and Response to Comment RAMV-97.
- RAMV (2)-119 This comment is verbatim to FEIR Comment E-62 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-98; therefore, refer to FEIR Response to Comment E-62 and Response to Comment RAMV-98.
- RAMV (2)-120 This comment is verbatim to FEIR Comment E-63 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-99; therefore, refer to FEIR Response to Comment E-63 and Response to Comment RAMV-99.
- RAMV (2)-121 This comment is verbatim to FEIR Comment E-64 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-100; therefore, refer to FEIR Response to Comment E-64 and Response to Comment RAMV-100.
- RAMV (2)-122 This comment is verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-101; therefore, refer to Response to Comment RAMV-101.
- RAMV (2)-123 This comment is verbatim to FEIR Comment E-65 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-102; therefore, refer to FEIR Response to Comment E-65 and Response to Comment RAMV-102.
- RAMV (2)-124 This comment is verbatim to FEIR Comment E-66 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-103; therefore, refer to FEIR Response to Comment E-65 and Response to Comment RAMV-103.
- RAMV (2)-125 This comment is verbatim to FEIR Comment E-67 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-104; therefore, refer to FEIR Response to Comment E-67 and Response to Comment RAMV-104.
- RAMV (2)-126 This comment is verbatim to FEIR Comment E-68 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-105; therefore, refer to FEIR Response to Comment E-68 and Response to Comment RAMV-105.
- RAMV (2)-127 This comment is verbatim to FEIR Comment E-69 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-106; therefore, refer to FEIR Response to Comment E-69 and Response to Comment RAMV-106.
- RAMV (2)-128 This comment is verbatim to FEIR Comment E-70 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-107; therefore, refer to FEIR Response to Comment E-70 and Response to Comment RAMV-107.
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RAMV (2)-129 This comment is similar to FEIR Comments C-4, C-92, and E-35, and E-71 and similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-108; therefore, refer to FEIR Response to Comments C-4, C-92, and E-35, E-71 and Response to Comment RAMV-108. This comment also is similar to the comment submitted by ASE to the Planning Commission numbered ASE-9, which for ease of reference is provided below. Comment RAMV (2)-129 includes an additional statement regarding increased idling time, air pollution, and noise impacts associated with truck travel on Decker Road. There is substantial evidence in the County's administrative record to indicate that trucks will not use Decker Road south of Oleander Avenue. Refer to the responses to comment cited above for examples of that evidence.

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

RAMV (2)-130 This comment is similar to FEIR Comment E-72 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-109; therefore, refer to FEIR Response to Comment E-72 and Response to Comment RAMV-109.

RAMV (2)-131 This comment is verbatim to FEIR Comment E-73 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-110; therefore, refer to FEIR Response to Comment E-73 and Response to Comment RAMV-110.

RAMV (2)-132 This comment is verbatim to FEIR Comment E-74 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-111; therefore, refer to FEIR Response to Comment E-74 and Response to Comment RAMV-111.

RAMV (2)-133 This comment is verbatim to FEIR Comment E-75 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-112; therefore, refer to FEIR Response to Comment E-75 and Response to Comment RAMV-112.

RAMV (2)-134 This comment is verbatim to FEIR Comment E-76 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-113; therefore, refer to FEIR Response to Comment E-76 and Response to Comment RAMV-113.

RAMV (2)-135 This comment is verbatim to FEIR Comment E-77 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-114; therefore, refer to FEIR Response to Comment E-77 and Response to Comment RAMV-114.

RAMV (2)-136 This comment is verbatim to FEIR Comment E-78 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-115; therefore,

- refer to FEIR Response to Comment E-78 and Response to Comment RAMV-115.
- RAMV (2)-137 This comment is verbatim to FEIR Comment E-79 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-116; therefore, refer to FEIR Response to Comment E-79 and Response to Comment RAMV-116.
- RAMV (2)-138 This comment is verbatim to FEIR Comment E-80 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-117; therefore, refer to FEIR Response to Comment E-80 and Response to Comment RAMV-117.
- RAMV (2)-139 This comment is verbatim to FEIR Comment E-81 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-118; therefore, refer to FEIR Response to Comment E-81 and Response to Comment RAMV-118.
- RAMV (2)-140 This comment is verbatim to FEIR Comment E-82 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-119; therefore, refer to FEIR Response to Comment E-82 and Response to Comment RAMV-119.
- RAMV (2)-141 This comment is verbatim to FEIR Comment E-83 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-120; therefore, refer to FEIR Response to Comment E-83 and Response to Comment RAMV-120.
- RAMV (2)-142 This comment is verbatim to FEIR Comment E-84 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-121; therefore, refer to FEIR Response to Comment E-84 and Response to Comment RAMV-121.
- RAMV (2)-143 This comment is verbatim to FEIR Comment E-85 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-122; therefore, refer to FEIR Response to Comment E-85 and Response to Comment RAMV-122.
- RAMV (2)-144 This comment is verbatim to FEIR Comment E-86 and the comment submitted by RAMV to the Planning Commission numbered RAMV-123; therefore, refer to FEIR Response to Comment E-86 and Response to Comment RAMV-123.
- RAMV (2)-145 This comment is verbatim to FEIR Comment E-87 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-124; therefore, refer to FEIR Response to Comment E-87 and Response to Comment RAMV-124.
- RAMV (2)-146 This comment is similar to FEIR Comment E-88 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-125; therefore, refer to FEIR Response to Comment E-88 and Response to Comment RAMV-125.
- RAMV (2)-147 This comment is verbatim to FEIR Comment E-89 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-126; therefore, refer to FEIR Response to Comment E-89 and Response to Comment RAMV-126.
- RAMV (2)-148 This comment makes a general statement about the Project's conditions of approval and staff report to the Board of Supervisors and does not indicate any specific errors
-

or omissions. 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.

RAMV (2)-149 This comment is verbatim to FEIR Comment E-90 and verbatim to the comment submitted by RAMV to the Planning Commission numbered RAMV-127; therefore, refer to FEIR Response to Comment E-90 and Response to Comment RAMV-127.

RAMV (2)-150 This comment is similar to FEIR Comment E-91 and similar to the comment submitted by RAMV to the Planning Commission numbered RAMV-128; therefore, refer to FEIR Response to Comment E-91 and Response to Comment RAMV-128. Comment RAMV (2)-150 includes the Project name and adds a phrase declaring opposition towards zone change. The commenter's opposition is acknowledged.

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

April 30, 2018

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

Dear Honorable Supervisors:

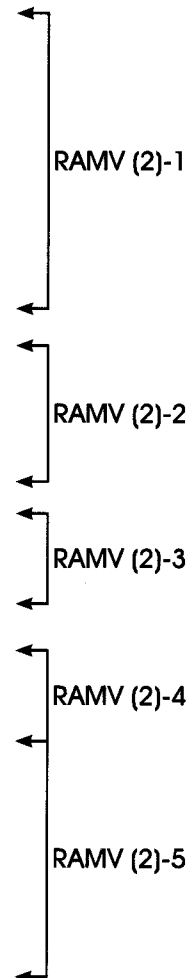
Re: Item 18.1 - Opposition to GPA 1151 & 1152 - Knox Business Park Building D & E Project - Final Environmental Impact Report No. 546

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

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

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

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

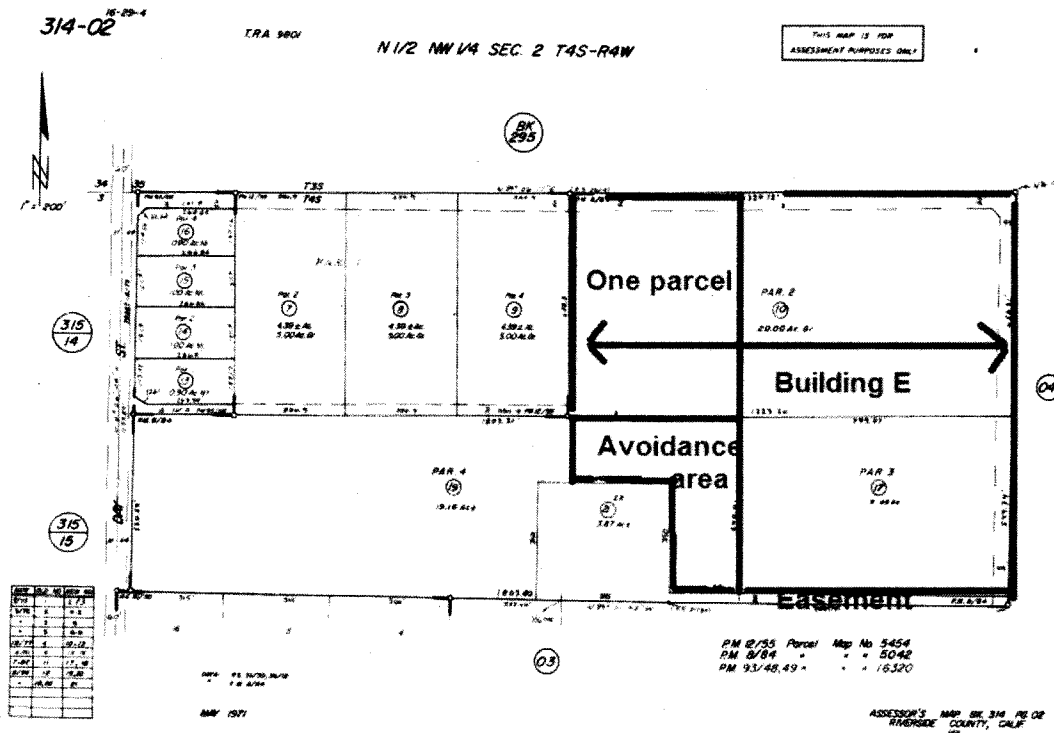


New Conditions of Approval and changes were available to the public on April, 26, 2018. There are so many inconsistencies, errors and omissions in the staff report and accompanying documents that it is impossible to understand what is really being proposed today.

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

Parcel: 10
Check Digit: 5

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



RAMV (2)-6

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

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

RAMV (2)-7

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

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

PM36950

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

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

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

or as approved by the Director of Transportation.

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

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

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

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

RAMV (2)-7
(cont.)

RAMV (2)-8

RAMV (2)-9

RAMV (2)-10

RAMV (2)-11

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

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

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

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

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

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

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

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

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



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

RAMV (2)-11
(cont.)

RAMV (2)-12

RAMV (2)-13

RAMV (2)-14

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.

RAMV (2)-15

~~60.Planning-EPD.2~~

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

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

- ~~-The locations of the nests and the owls proposed for relocation.~~
- ~~-The locations of the proposed relocation sites.~~
- ~~-The numbers of adult owls and juveniles proposed for relocation.~~
- ~~-The time of year when relocation is proposed to take place.~~
- ~~-The name of the biologist proposed to supervise the relocation, and the details of his/her previous experiences capturing, handling, and relocating burrowing owls, including the outcomes of their previous relocation efforts (survival/mortality rates and site-fidelity rates of ti relocated owls), and relevant permits held.~~
- ~~-A detailed description of the proposed method of capture, transport, and acclimation of the current project's owls on the proposed relocation site.~~
- ~~-A detailed description of relocation site preparations (e.g., the design and dimensions of the artificial release burrows and hacking cage, duration of hacking activities (including food and water provision).~~
- ~~-Description of the monitoring methods and monitoring duration to be employed to verify survival of the relocated owls and their long-term retention on the relocation site.~~

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

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

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

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

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

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

Goal 2:
Eliminate diesel trucks from unnecessarily traversing through residential neighborhoods. These two warehouses will be bringing 800 truck trips a day through our quiet rural neighborhoods using our two lane country roads and going past two elementary schools and a middle school near Cajalco Road and Clark Street.

Decker Road ends at Markham and goes up a steep grade with an "S" curve were 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.

RAMV (2)-16

RAMV (2)-17

RAMV (2)-18

RAMV (2)-19

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.

RAMV (2)-20

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

RAMV (2)-21

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

RAMV (2)-22

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

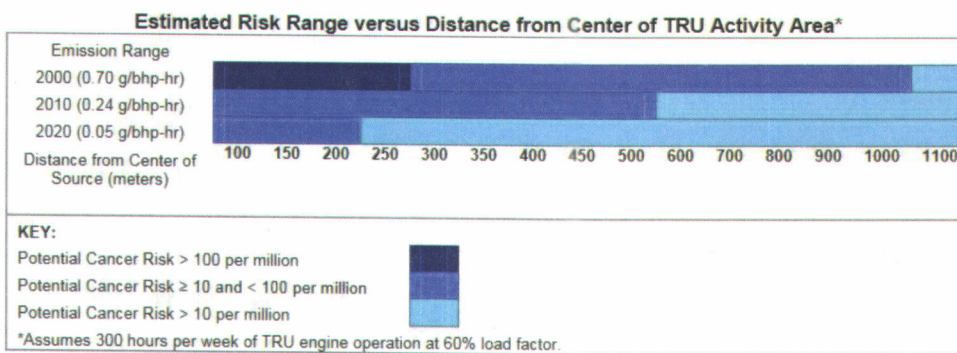
Statements that these warehouses will use 2010 or newer trucks also goes back to monitoring.

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



RAMV (2)-22
(cont.)

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.

RAMV (2)-23

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.

RAMV (2)-24

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

RAMV (2)-25

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.

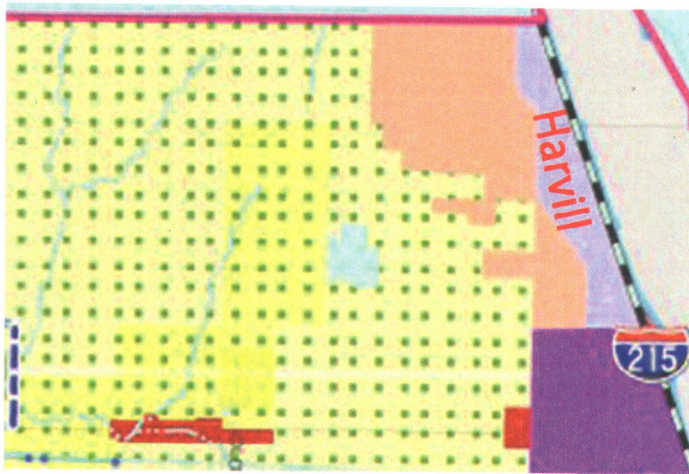
RAMV (2)-25
(cont.)

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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RAMV (2)-26



COMMUNITY DEVELOPMENT
 Light Industrial
 High Industrial
 Business Park
 Public Facilities
 Mixed Use Planning Area

RURAL COMMUNITY
 Estate Residential (2 ac min)
 Very Low Density Residential (1 ac min)
 Low Density Residential (0.5 ac min)

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

PROJECT

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

RAMV (2)-27

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

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

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

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

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

First

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

RAMV (2)-27
(cont.)

RAMV (2)-28

RAMV (2)-29

RAMV (2)-30

in EIR 546.

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

Urban Crossroads noise analysis study for the "Project"

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

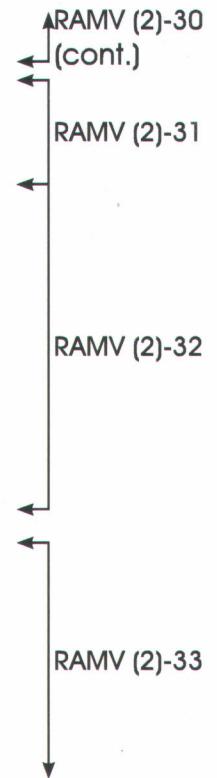


EXHIBIT 1-A: LOCATION MAP



RAMV (2)-33
(cont.)

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

RAMV (2)-34

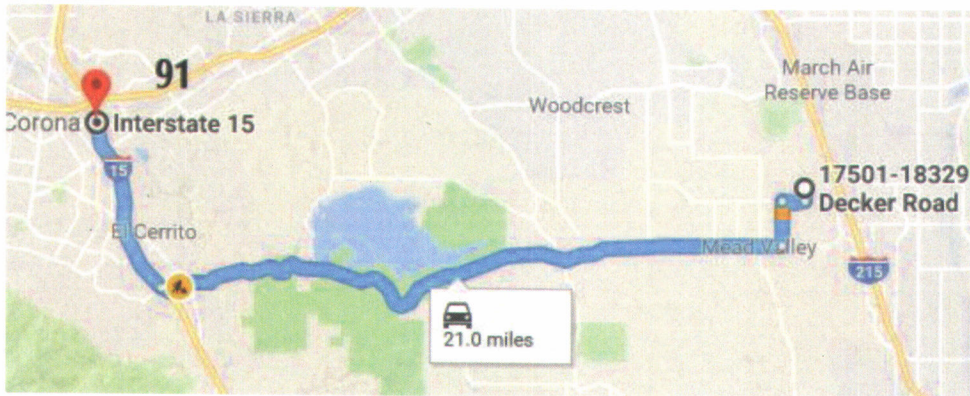
Old Oleander is an Industrial Collector and is designated to have 2 lanes with a minimum right-of-way of 78-feet. Industrial Collectors are circulatory streets with a continuous left-turn lane with at least one end connecting to a road of equal or greater classification.

RAMV (2)-35

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.

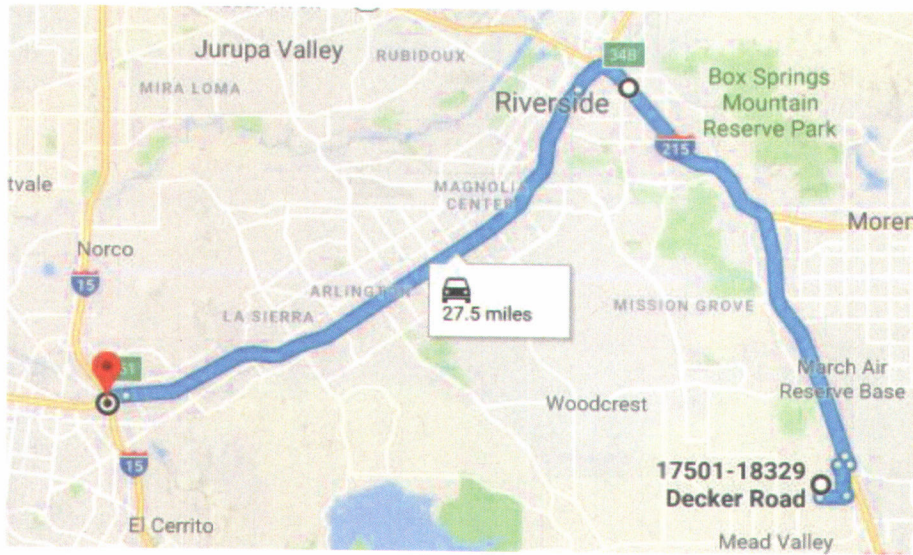
RAMV (2)-36

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.



RAMV (2)-37

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



RAMV (2)-37
(cont.)

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.

RAMV (2)-38



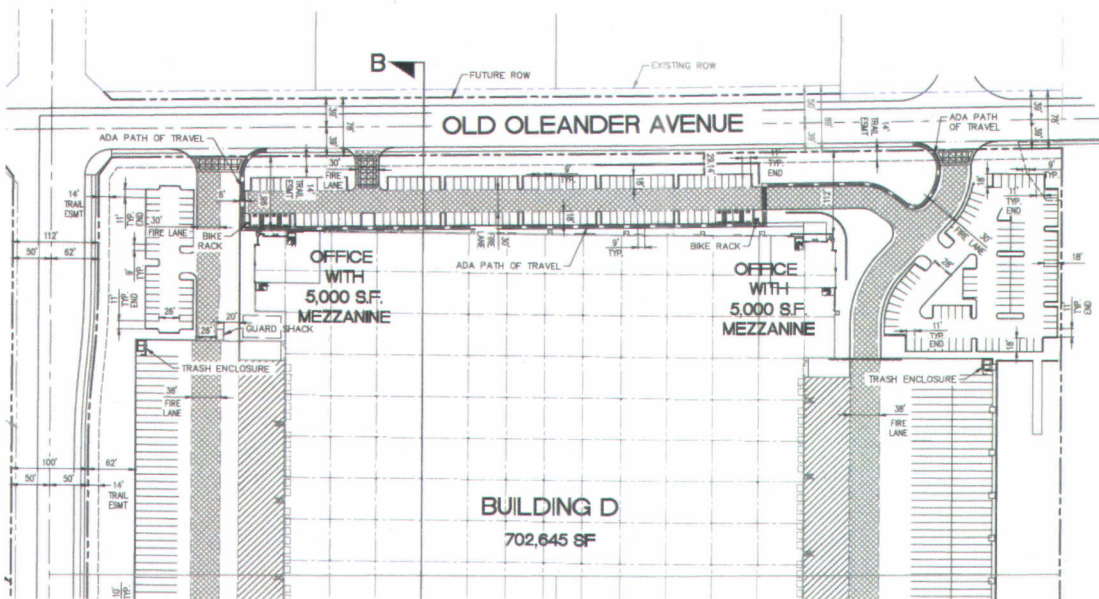
RAMV (2)-39

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



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

RAMV (2)-40



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.

RAMV (2)-41

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.**

RAMV (2)-42

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.

RAMV (2)-43

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

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

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

RAMV (2)-44

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>).

RAMV (2)-44
(cont.)

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.

RAMV (2)-45

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.

RAMV (2)-46

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

RAMV (2)-47

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

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

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

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

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

Noise Sensitive Land Uses

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

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

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

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

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

RAMV (2)-47
(cont.)

RAMV (2)-48

RAMV (2)-49

RAMV (2)-50

RAMV (2)-51

RAMV (2)-52

RAMV (2)-53

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

Policies:

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

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

Noise: Rural Community VLDR

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

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

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

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

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

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

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

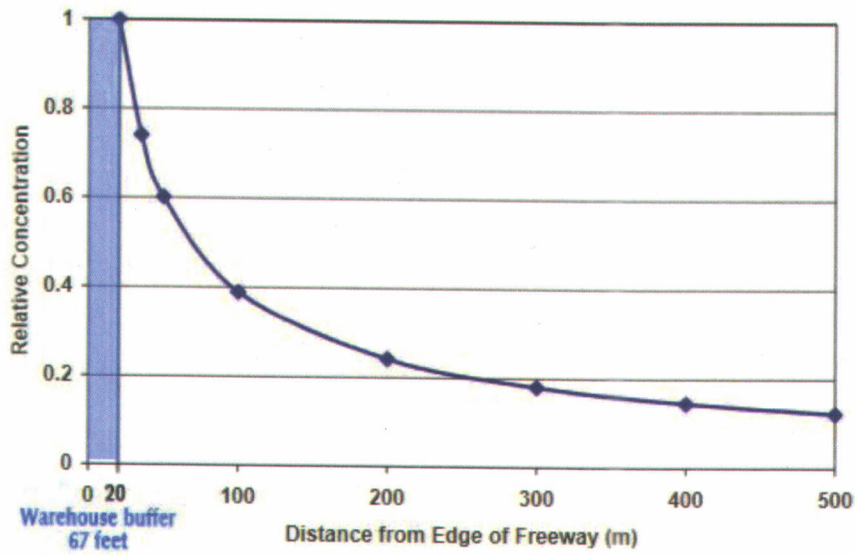
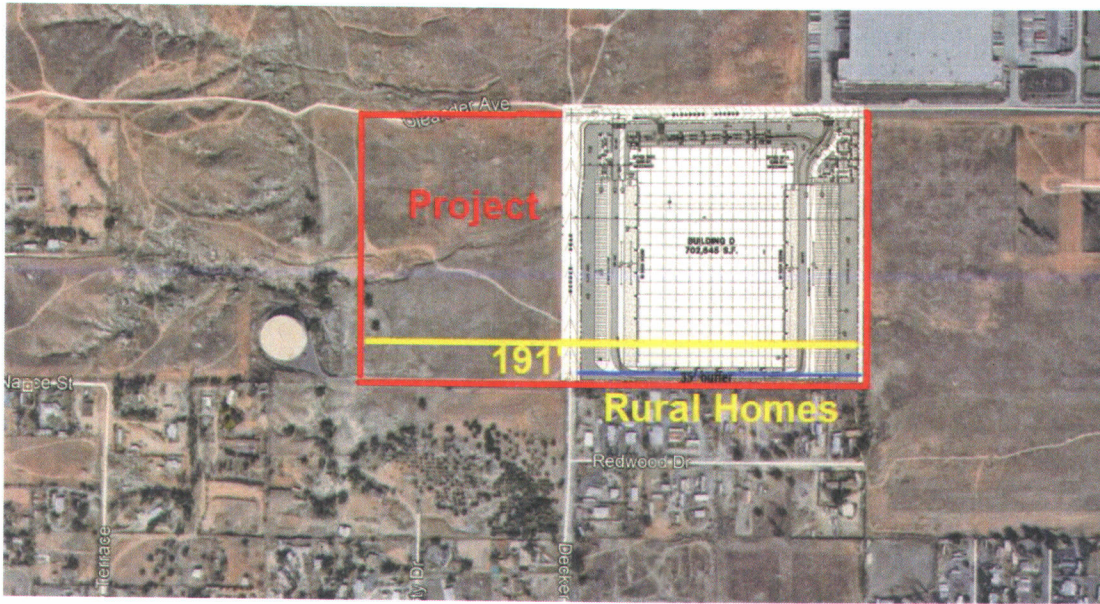
<https://www.pe.com/2017/04/18/southern-californias-smog-clean-up-future-is-far-from-clear/>

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

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(cont.)

RAMV (2)-54

RAMV (2)-55



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

RAMV (2)-55
(cont.)

RAMV (2)-56

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.

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[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>

Mobile Source Toxics Analysis

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

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

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

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(cont.)

RAMV (2)-58

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Truck Idling Facilities

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

RAMV (2)-59
(cont.)

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RAMV (2)-61

RAMV (2)-62

RAMV (2)-63

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

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

(10) Electrify auxiliary power units.

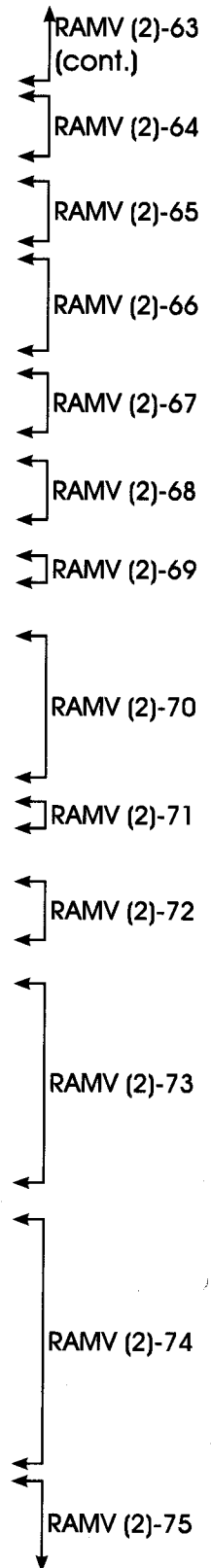
- (11) Provide onsite services to minimize truck traffic in or near residential areas, including, but not limited to, the following services: meal or cafeteria service, automated teller machines, etc.
No services are being provided.
- (12) Require or provide incentives to use low-sulfur diesel fuel with particulate traps;
- (13) Conduct air quality monitoring at sensitive receptors.
This must be mandatory. Location of these receptors is critical.

- **County of Riverside General Plan December 8, 2015 Page 11**
- AQ 1.11
- Involve environmental groups, the business community, special interests, and the general public in the formulation and implementation of programs that effectively reduce airborne pollutants.
This is not happening. Current guidelines are being completely ignored.

Sensitive Receptors

- Sensitive receptors refer to those segments of the population most susceptible to poor air quality (i.e. children, elderly and the sick) and to certain at-risk sensitive land uses such as schools, hospitals, parks, or residential communities. The intent of the following policies is to reduce the negative impacts of poor air quality on Riverside County’s sensitive receptors.
NO BUFFERS provided and will be at risk to the health effects of this project.

Policies:
AQ 2.1



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

AQ 2.2

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

AQ 2.3

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

AQ 2.4

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

- **Stationary Pollution Sources**

AQ 4.6

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

AQ 4.7

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

http://planning.rctlma.org/Portals/0/genplan/general_Plan_2017/elements/OCT17/Ch09_AQ%20%20Element_120815.pdf?ver=2017-10-11-102104-270

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 infirm.

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(cont.)

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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

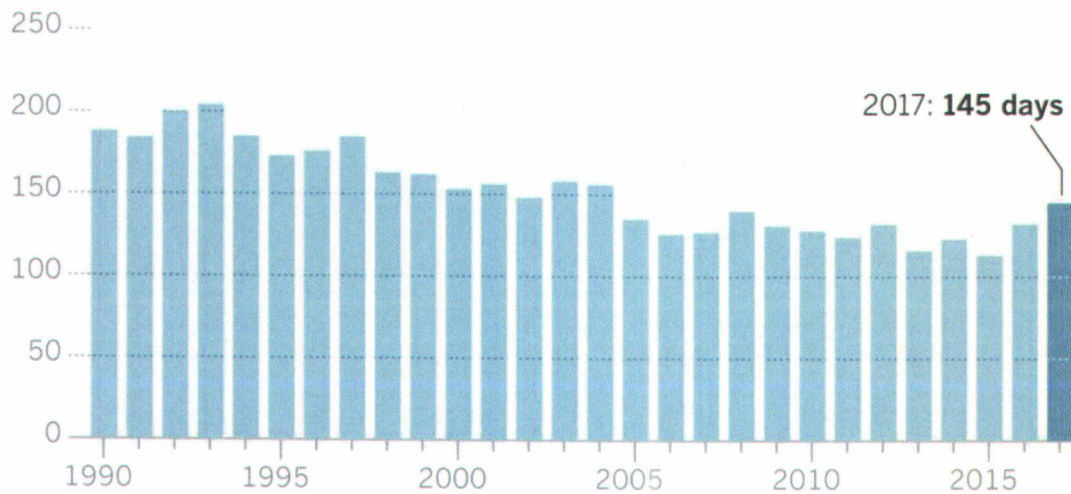
Encourage the installation and use of electric service units at truck stops and distribution centers for heating and cooling truck cabs, and particularly for powering refrigeration trucks in lieu of idling of engines for power. (AI 120)

AQ 17.10

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

RAMV (2)-77

Southern California bad air days for ozone



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

RAMV (2)-78

Riverside County Parks and Open Space Comprehensive Trails Plan

Chapter 3 - Page 46

Mead Valley Area Plan

The Mead Valley Area Plan represents an area in western central Riverside County. The three major land uses are open space, rural communities, and some light industrial. A number of institutional areas surround the planning area, potentially influencing the area's development. Policies related to trails contained within the Mead Valley Area Plan area.

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

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



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

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

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

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RAMV (2)-81

RAMV (2)-82

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

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

Health

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

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

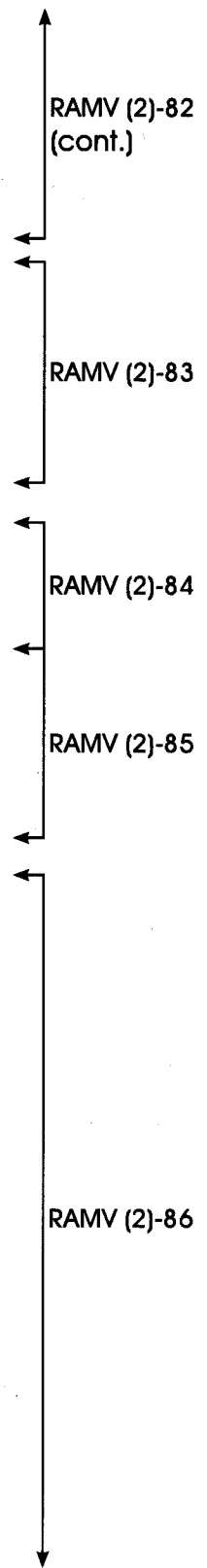
**Mead Valley Area Plan
Industrial Development**

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

Policies:

MVAP 6.1

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



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

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

Fifth.

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

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

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

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

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

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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.

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(cont.)

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

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

DEIR SCH No. 2015081081. Page 3-32 - 3.6 CONSTRUCTION CHARACTERISTICS

As part of proposed grading activities, blasting would be necessary in hard rock areas on the southern portion of the Project site. Based on the excavation plans prepared on June 16, 2015, by the Henry- Ann Company, rock blasting within the Project site is expected to include the drilling of up to 5,253 holes in the largest area, in which small charges would be placed to fragment the rocks into smaller, crushable pieces. **Approximately 112,090 cubic yards (c.y.) of rock is expected to be produced during proposed blasting activities, which would be crushed and used on the Project site as construction base.** An electric rock crusher powered by a 300 horsepower diesel generator is proposed to further break down the fragmented rocks. The Project Applicant calculates that approximately 2,759 tons of rock would be processed on the Project site per day during the blasting and rock crushing phase of construction (approximately 65 working days). (Urban Crossroads, Inc, 2015a, pp. 28-29).

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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 SILCA DUST AS BASE.

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

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

OSHA- CONTROL OF SILICA DUST IN CONSTRUCTION

Crushing Machines

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

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

What is Silicosis?

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

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

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

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

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

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

These symptoms can worsen over time and lead to death.

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

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

https://www.fhwa.dot.gov/Environment/noise/construction_noise/handbook/handbook09.cfm

http://homenewshere.com/daily_times_chronicle/news/woburn/article_9d90876a-8afe-11e1-acb5-0019bb2963f4.html

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

http://deohs.washington.edu/sites/default/files/images/general/Quarry_Rpt.pdf

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

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

wet rock and dust.

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

Sixth.

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

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

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(cont.)

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



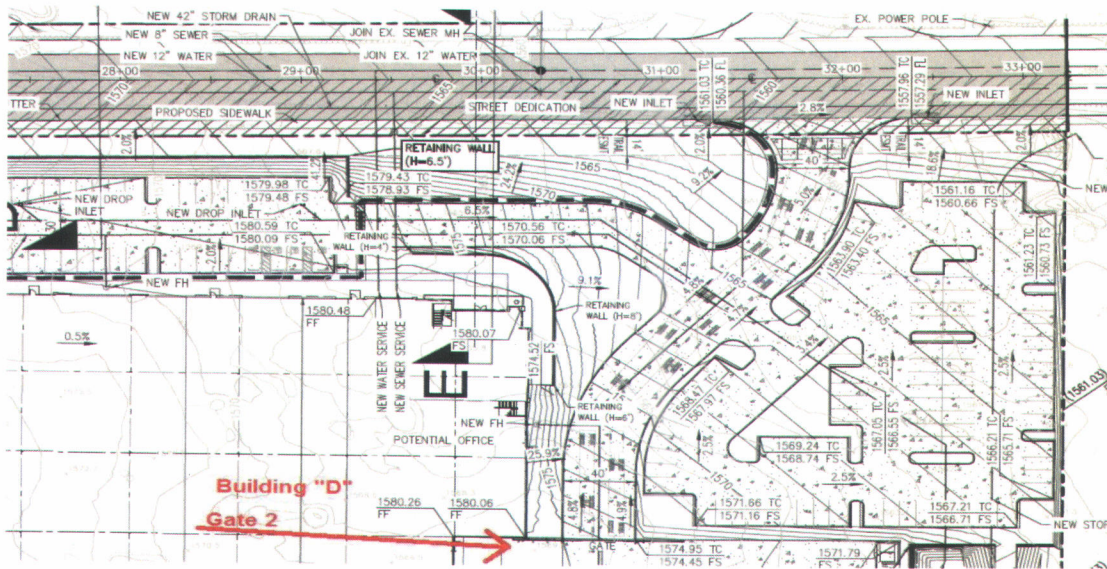
Harvill Ave. with trucks lined up to enter the warehouse at 17789 Harvill Ave.

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(cont.)



RAMV (2)-90
(cont.)

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.

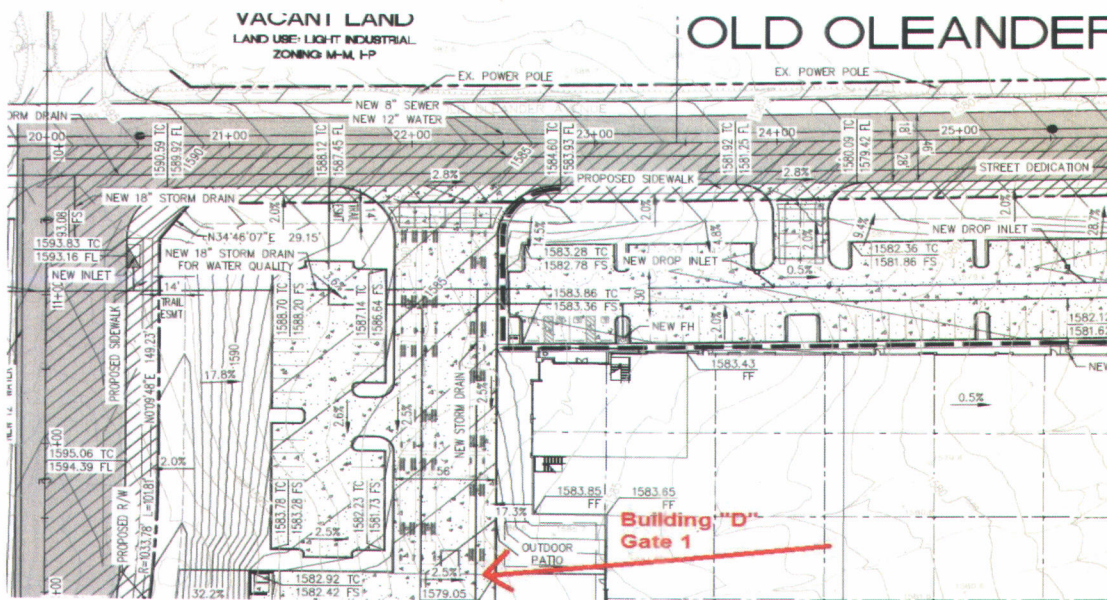


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Building "D" site map dated February 24, 2017 shows the east entrance along Oleander that allows just 4 trucks to queue on site behind the gate to access the building. Knox Logistics Warehouse at 17789 Harvill Ave. shows room for 7 trucks to queue 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.

RAMV (2)-91

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.

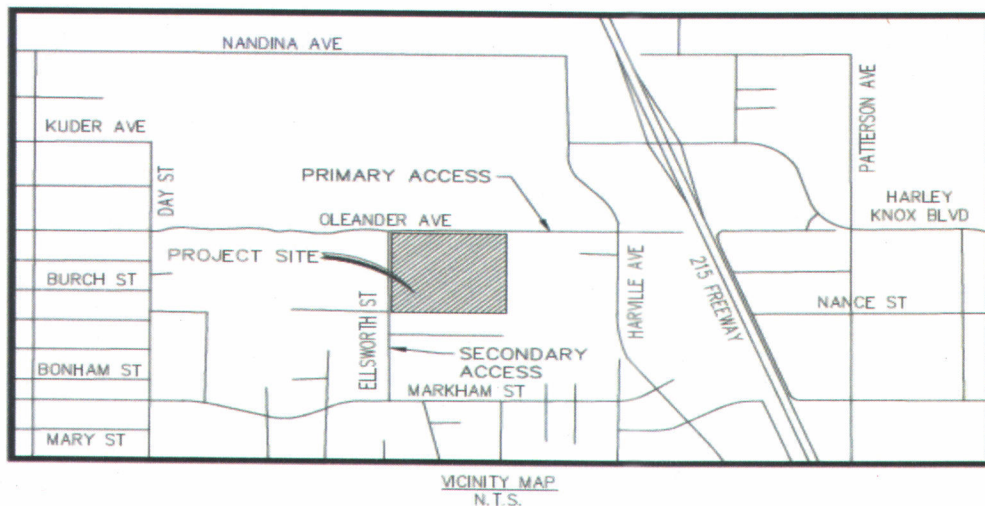


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(cont.)

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.



RAMV (2)-92

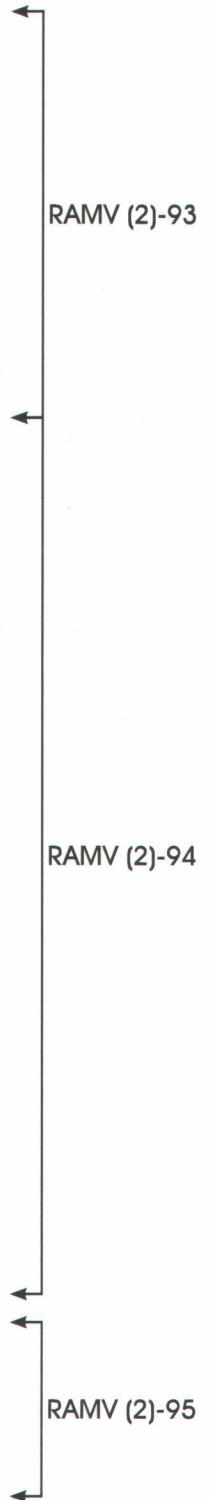
The site plan indicates that Old Oleander will be the Primary Access and Ellsworth / Decker will be the secondary access for trucks coming into and leaving Building D and E. This has not been evaluated in the EIR as there are a host of very serious concerns using Ellsworth / Decker Road south of the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



RAMV (2)-93

RAMV (2)-94

RAMV (2)-95



RAMV (2)-96

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.



RAMV (2)-97

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.

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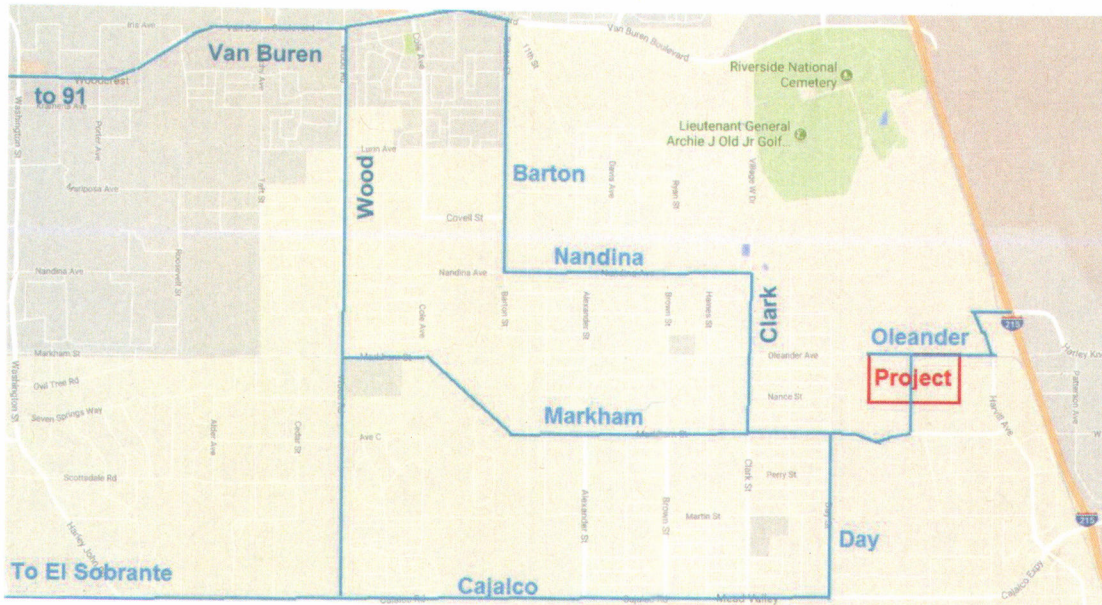
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(cont.)

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

Tenth.

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

RAMV (2)-104

4.4 Barriers

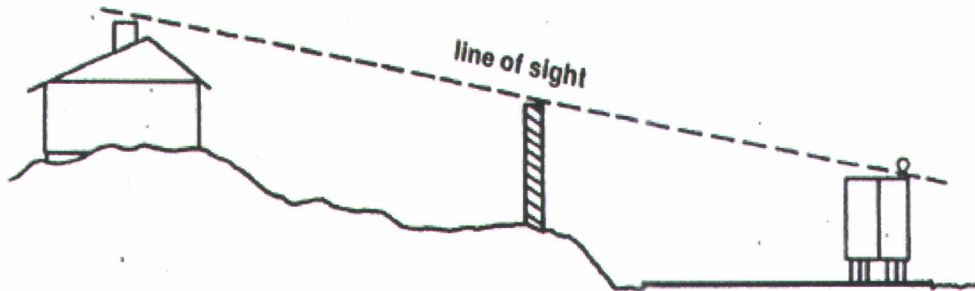
A noise barrier is an obstacle placed between a noise source and a receiver which interrupts the path of the noise. They can be made out of many different substances:

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

RAMV (2)-105

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

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



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

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

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

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

https://www.fhwa.dot.gov/ENVIRONMENT/noise/noise_compatible_planning/federal_approach/audible_landscape/al04.cfm

Role of Topography

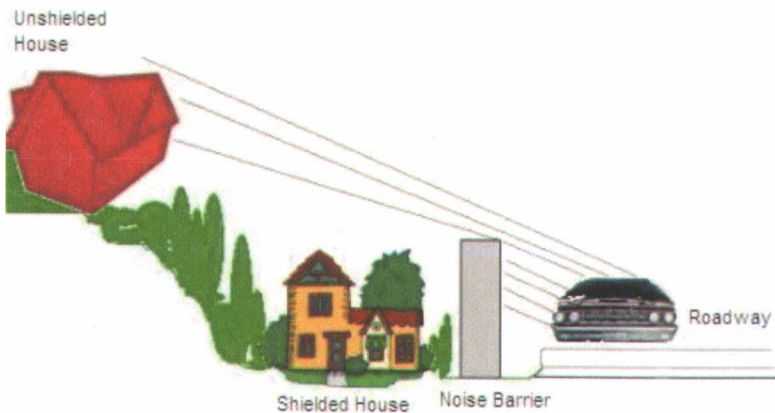
To work effectively, the barrier must be high enough and long enough to block the view of the road from the area that is to be protected. Sound barriers do very little for homes on a hillside overlooking a road.

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(cont.)

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RAMV (2)-107

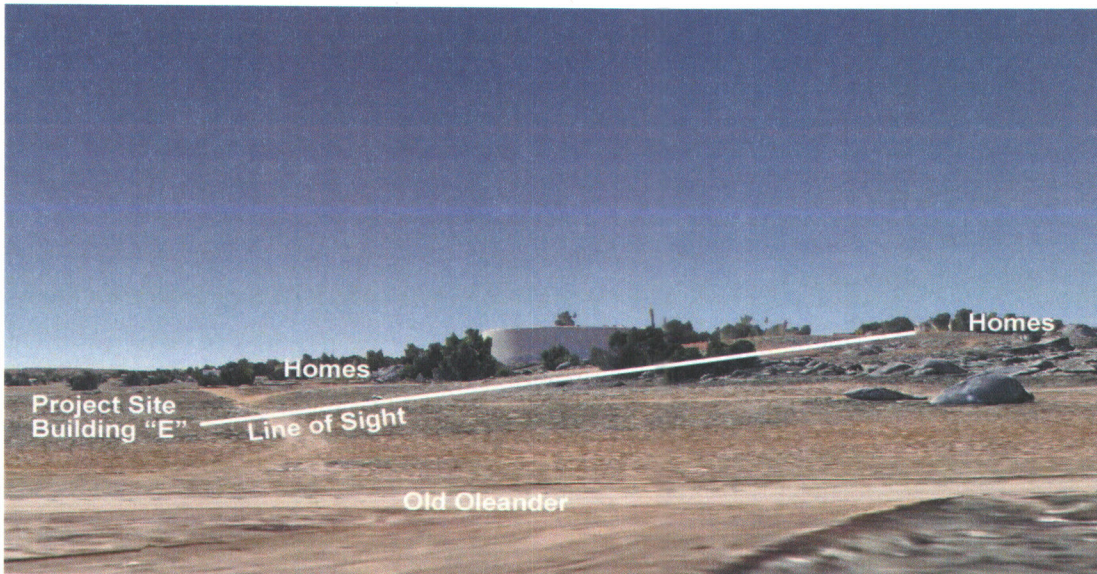
RAMV (2)-108



Source: FHWA Website

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

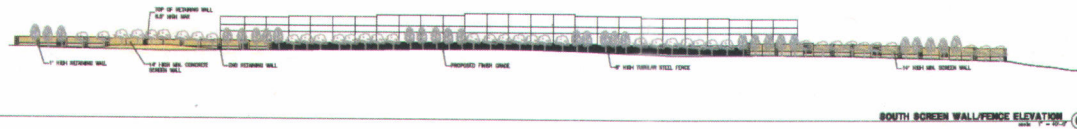
In addition, buildings higher than barriers, homes scattered too far apart, and openings in noise barriers for driveway connections or intersecting streets are not good areas for sound barriers. In some cases, SHA can offer alternatives to help reduce noise levels. These alternatives are evaluated on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



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

RAMV (2)-108
(cont.)

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



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



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

RAMV (2)-108
(cont.)

Eleventh.

E3.0 PROJECT DESCRIPTION

1. Earthwork and Grading

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

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

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

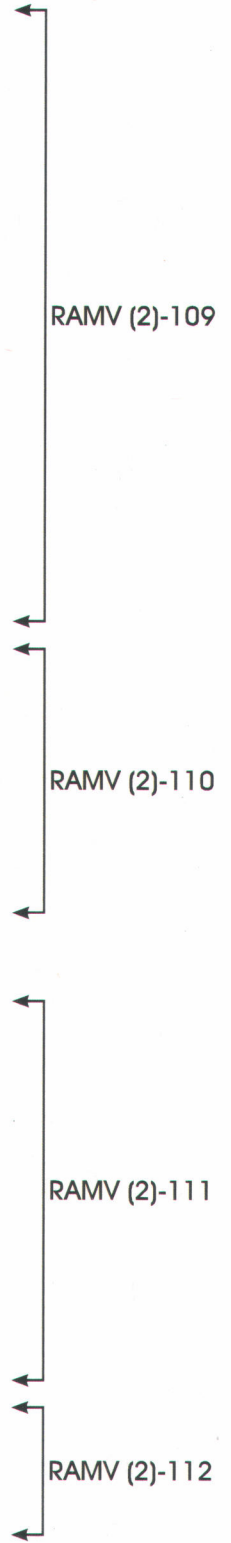
Twelfth.

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

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

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

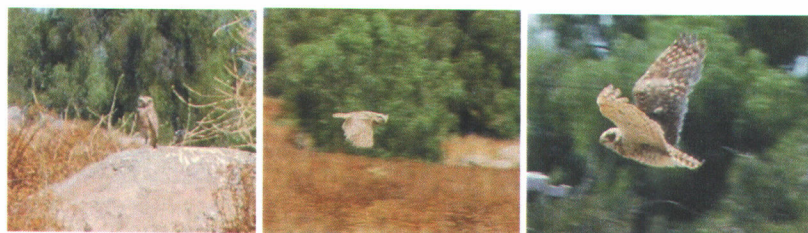
Over 20 years ago before the water tank was built, I met with archeologist Daniel McCarthy from the UCR Eastern Research Center who went over the cultural significance of this site. The entire area proposed for Building E and D have significant cultural artifacts and are part of a pre-historic Native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



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

RAMV (2)-113

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.



RAMV (2)-114

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).

RAMV (2)-115

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

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

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

RAMV (2)-116

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

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

Thirteenth.

3.5 OPERATIONAL CHARACTERISTICS

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

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

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

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

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(cont.)

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RAMV (2)-120

enforcement of these mitigation measures will be addressed.

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(cont.)

Fourteenth.

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

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

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Fifteenth.

Jobs.

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

RAMV (2)-123

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

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

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

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

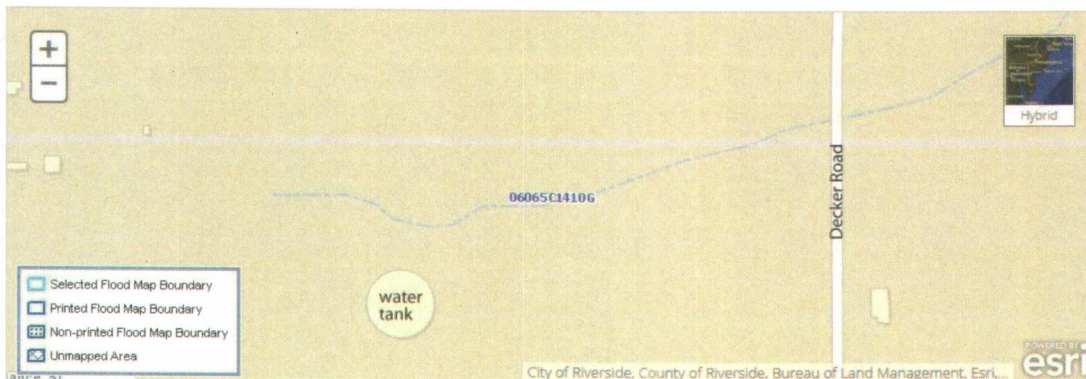
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(cont.)

Sixteenth.

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

FEMA Flood Map Service Center : Search By Address

Locator Map



RAMV (2)-124

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

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

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

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Seventeenth.

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

RAMV (2)-126



RAMV (2)-127

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.

RAMV (2)-127
(cont.)

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

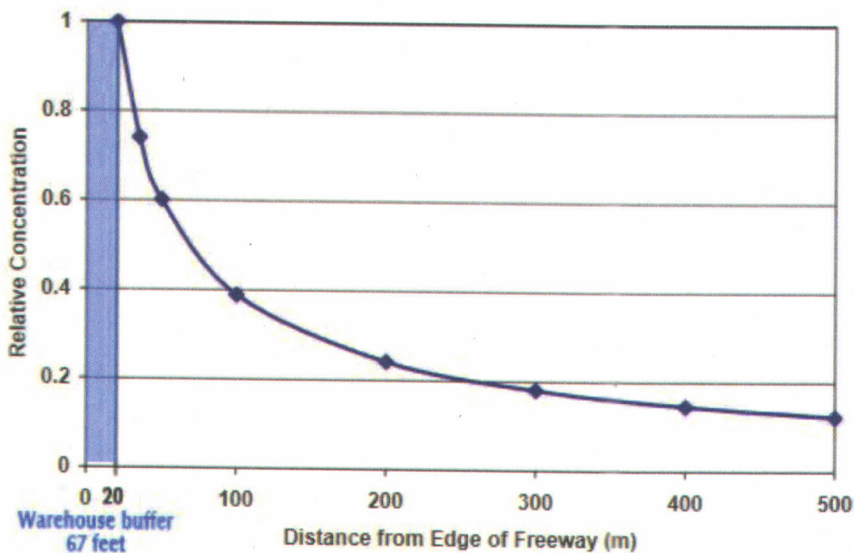
RAMV (2)-128

Eighteenth.

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

RAMV (2)-129

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



RAMV (2)-130

<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.

RAMV (2)-130
(cont.)

Nineteenth

Article from SCAG.

What is Environmental Justice?

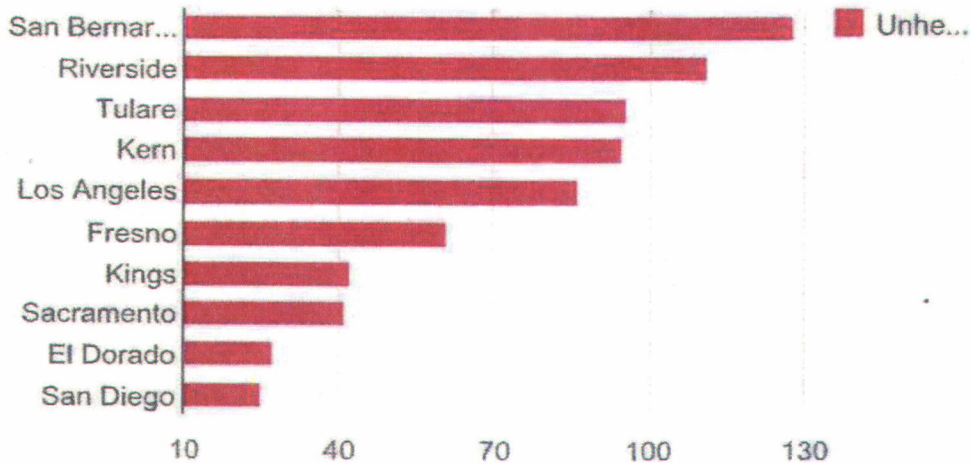
Environmental Justice is about equal and fair access to a healthy environment, with the goal of protecting underrepresented and poorer communities from incurring disproportionate environmental impacts. The SCAG region is demographically and economically diverse, and displays the extremes in household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

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

RAMV (2)-131

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

Most ozone polluted counties in the U.S.



Source: American Lung Association

RAMV (2)-131
(cont.)

Twentieth.

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

Riverside County Vision

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

"Riverside County is a family of special communities in a remarkable environmental setting."

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

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

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

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

RAMV (2)-132

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

Hillside Development & Slope

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

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

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

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

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

RAMV (2)-132
(cont.)

RAMV (2)-133

RAMV (2)-134

RAMV (2)-135

RAMV (2)-136

RAMV (2)-137

- 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.

RAMV (2)-138

- 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.

RAMV (2)-139

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.

RAMV (2)-140

- 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.

RAMV (2)-141

RAMV (2)-142

- EIR is inconsistent in the analysis of the buildings height, slopes, sound walls, noise pollution, and air pollution. The EIR underestimates the impacts of Truck traffic to the communities of Mead Valley, Orangecrest, Woodcrest and Greater Lake Mathews and city of Riverside. Allowing Decker / Ellsworth as the secondary access encourages heavy truck traffic to travel throughout our rural communities using local country roads and highways.

RAMV (2)-143

- 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.

RAMV (2)-144

RAMV (2)-145

RAMV (2)-146

RAMV (2)-147

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

Conclusion

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

RAMV (2)-148

RAMV (2)-149

RAMV (2)-150

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

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

Sincerely,



Debbie Walsh
 President, Rural Association of Mead Valley

Residents Association of Greater Lake Matthews – Letter RAGLM

- RAGLM-1 The commenter's opposition to the proposed Project is noted.
- RAGLM-2 As noted by this comment and as shown in Final EIR Table 4.15-14, *Project Trip Generation (Actual Vehicles)*, the Project is calculated to generate 806 daily truck trips. This comment is similar to FEIR Comments C-4, C-92, and E-35, and E-71; therefore, refer to FEIR Response to Comments C-4, C-92, E-35, and E-71. As noted in those responses, there is substantial evidence in the County's administrative record to indicate that Project-related trucks will not use Decker Road south of Oleander Avenue. Refer to the responses to comment cited above for examples of that evidence. Further the County has added a condition of approval on the Project that will restrict heavy vehicles, through a weight restriction, from traveling on Decker Road (Ellsworth Street) south of Oleander Avenue. With the addition of this condition, it is reasonably assured that Project-related truck traffic will not use this roadway segment. As such, the truck distribution assumptions used in the FEIR's traffic analysis and vehicular-related air quality and noise analyses are supported, and the path of travel for these trucks will not pass the schools noted in this comment.
- RAGLM-3 Refer to Response to Comment RAGLM-2. There is substantial evidence in the County's administrative record to indicate that Project-related trucks will not use Decker Road south of Oleander Avenue or any dirt roads in the local area.
- RAGLM-4 Refer to FEIR Response to Comments C-4, C-94, and I-4, which supply substantial evidence that that there is no reasonable potential for Project-related trucks to travel on local roads towards Cajalco Road nor lead to indirect impacts along El Sobrante Road or La Sierra Avenue.
- RAGLM-5 This comment is addressed by FEIR Response to Comment E-88, FEIR Response to Comment K-3, the response to the comment submitted by Blum Collins LLP (BC) to the Planning Commission numbered BC-12. Refer to the FEIR for Responses to Comments E-88 and K-3. For ease of reference, the Responses to Comment BC-12 is provided below.
- Response to Comment BC-12 states: The Riverside County General Plan designates the Project site and lands to the north and east for Community Development uses, which are intended for urban and suburban development (Riverside County General Plan, Chapter 3, Land Use). Lands to the west and the south are designated by the General Plan for Rural Community uses, which are intended for rural development (Riverside County General Plan, Chapter 3, Land Use). In order to induce unplanned growth to the west or to south of the Project site on properties in the Rural Community Foundation Component area, the County would need to consider and approve a Foundation Component General Plan Amendment, which under the County's Municipal Code (Riverside County Ordinance No. 348.4835 (B)), "Limitations on Foundation Component Amendments" states "...no Foundation Component Amendment shall be heard or approved except as part of the Eight-Year General Plan
-

Review Cycle. The first Eight-Year General Plan Review Cycle shall commence on January 1, 2008 and continue during the 2008 calendar year, and subsequent cycles shall occur at eight calendar year intervals thereafter.” The last filing period for such amendment requests closed in June 2016, and the next cycle will not commence again until at least 2024. All Foundation Component Amendment requests are considered by a General Plan Advisory Committee (“GPAC”), the Planning Commission, and the County’s Board of Supervisors, and are deliberated upon in depth by all three bodies. There is substantial evidence in the FEIR and the Project’s administrative record to indicate that the Project would act as a physical demarcation between the Community Development and Rural Community Foundation Component areas in this portion of Mead Valley.

RAGLM-6 The community of Lake Matthews is located approximately 6.5 miles west of the Project site. There is no evidence presented in this comment letter or in the Project’s administrative record to indicate that the Project would cause or contribute to a significant environmental impact in the Lake Matthews community. As stated in Response to Comment RAGLM-6 and the other responses to comments referenced therein, there is substantial evidence in the Project’s administrative record to indicate that there is no reasonable potential for Project-related trucks to travel west on Cajalco Road toward and through the Lake Matthews community in any volume to result in a significant impact to the environment. The commenter’s opposition to the proposed Project is noted.

Subject: FW: GPA 1151 and 1152

From: Dr. John L. MINNELLA-Romano [mailto:drjminnella@yahoo.com]
Sent: Monday, April 30, 2018 5:15 PM
To: Supervisor Jeffries - 1st District <district1@RIVCO.ORG>; District3 <District3@Rivco.org>; District5 <District5@Rivco.org>; District2 <District2@Rivco.org>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; COB <COB@RIVCO.ORG>; Hildebrand, John <Hildebr@RIVCO.ORG>; Brady, Russell <rbrady@RIVCO.ORG>
Cc: RAMV <abilene149@gmail.com>
Subject: GPA 1151 and 1152

April 30, 2018

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

County of
County
4080

Re: RAGLM Opposition to General Plan Amendments 1151 and 1152

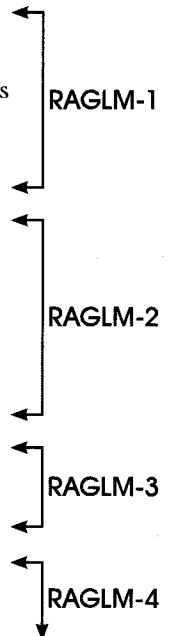
Honorable Supervisors:

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

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

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

ALREADY EXTREME DRIVING DANGER. The roads that will be negatively affected by approval of GPA 1151 and 1152 are already extremely dangerous. Accidents, many of them fatal, occur nearly every day along



Cajalco Road. Trucks will increase cars trying to pass on this two lane road. Many of these trucks and cars will use El Sobrante Road and then La Sierra to the I-91.

↑ RAGLM-4
(cont.)
←

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

← RAGLM-5
←

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

← RAGLM-6
←

Respectfully submitted.

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

John L. Minnella

President

Sincerely,

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

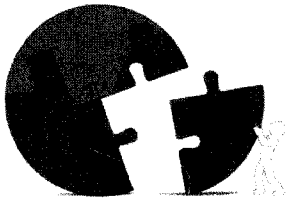
[signed] Dr. John L. Minnella

California, USA address: 1820 East 17th Street, Santa Ana, California 92705-8604. Telephone: 714/543-9005; Facsimile: 714/542-2495. Email: drjminnella@yahoo.com or minnellalaw@sbcglobal.net. Affiliated offices also in: Managua, NICARAGUA (Headquarters); Port Harcourt, NIGERIA; and Phnom Penh, CAMBODIA. Website: www.minnellalaw.com.

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County of Riverside California



Charissa Leach, P.E.
Assistant TLMA Director

RIVERSIDE COUNTY PLANNING DEPARTMENT

Memorandum

DATE: May 21, 2018
TO: Board of Supervisors
FROM: Russell Brady, Project Planner
RE: Item 18.1 – Project Enhancements

As noted in the Form 11, the applicant is proposing certain enhancements to the project that was previously presented at the May 1, 2018 Board of Supervisors hearing. These include additional landscaping along the southern boundary of Building D and additional paving of Ellsworth Street south of the project site to Redwood Drive. Attached are updated plans to reflect these enhancements as well as updated conditions of approval shown below (new text underlined) to reflect these enhancements.

To address the additional paving area to Redwood Drive, additional technical reports have been prepared to address the impacts of this paving relative to the project's Environmental Impact Report.

PP25838 (New Condition, Prior to Building Permit Issuance)

Southern Boundary Landscaping

Consistent with the updated exhibit provided at the Board of Supervisors meeting on May 22, 2018, the southern area of the site shall be landscaped with trees densely spaced for enhanced screening of the site. Trees planted within the primary row closest to the building shall consist of trees planted within the secondary row area at 36" box minimum pine trees planted at fifteen (15) feet on center. Trees planted within the secondary row closest to the adjacent residential lots shall consist of 15% 48" box minimum, 75% 36" box minimum, and the remaining 10% 24" box minimum. This shall be shown on the Final Landscape Plan which shall be submitted prior to building permit issuance.

PP25837 (Edited Condition, Prior to Building Permit Final Inspection)

Use - Dedications

Ellsworth Street along project boundary is designated Secondary and shall be improved with 64' to 76' full-width AC pavement, 6" concrete curb and gutter, within the 100' to 112' full-width dedicated right-of-way in accordance with County Standard No. 94, Ordinance 461. (64' to 76'/100'to 112')
NOTE: Construct curb and gutter and 5' concrete sidewalks 9' from the curb line (both sides) within the 18' parkways.

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

5/22/18
2018-0477-26

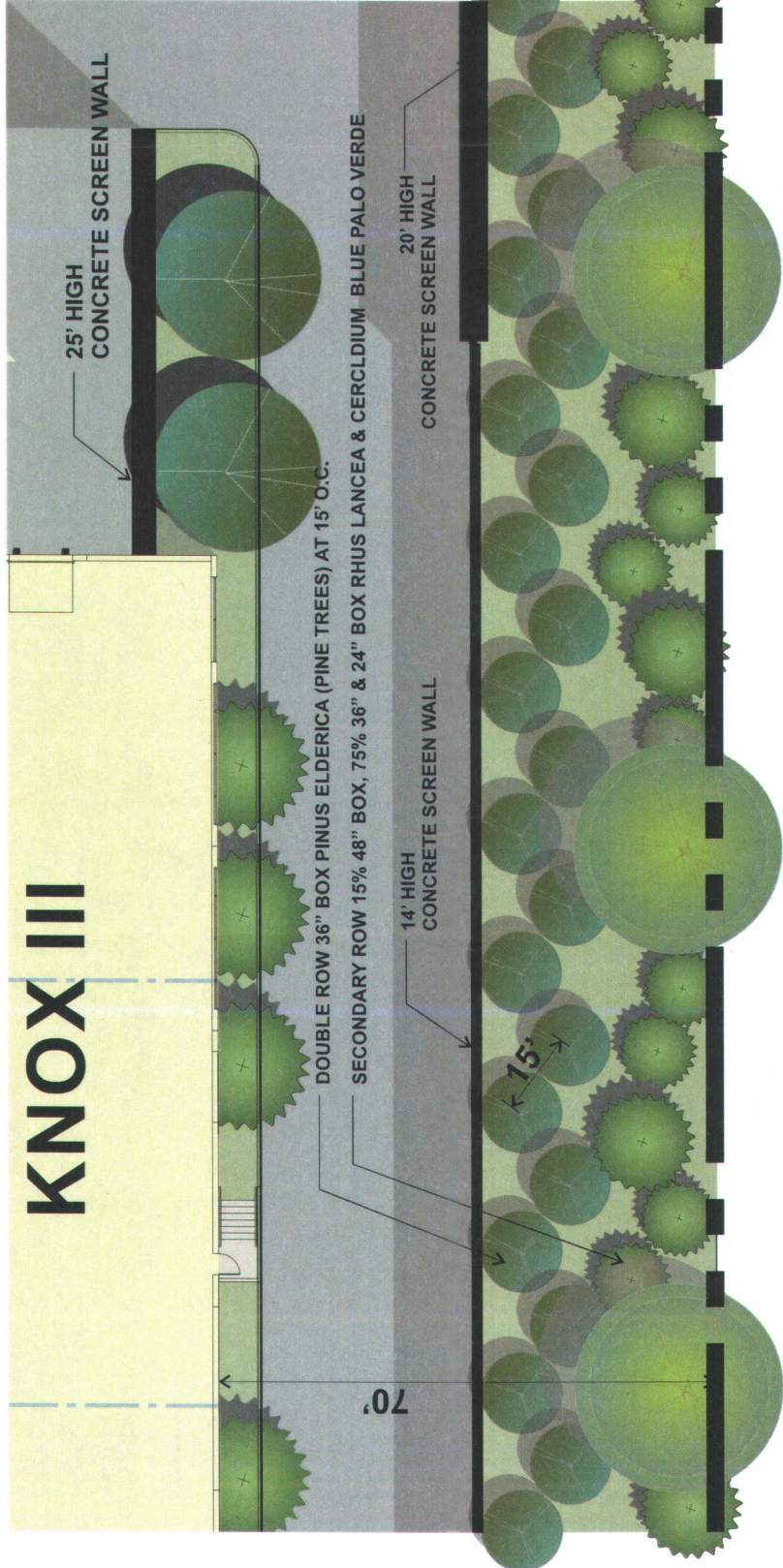
Ellsworth Street from the project southerly boundary to Redwood Drive shall be improved with a minimum of 20' AC pavement within the existing 20' right-of-way.

PP25838 (Edited Condition, Prior to Building Permit Final Inspection)

Use - Dedication

Decker Road (Ellsworth Street) along project boundary is designated Secondary and shall be improved with 64' to 76' full-width AC pavement, 6" concrete curb and gutter, within the 100' to 112' full-width dedicated right-of-way in accordance with County Standard No. 94, Ordinance 461. (64' to 76'/100'to 112') NOTE: Construct curb and gutter and 5' concrete sidewalks 9' from the curb line (both sides) within the 18' parkways.

Decker Road (Ellsworth Street) from the project southerly boundary to Redwood Drive shall be improved with a minimum of 20' AC pavement within the existing 20' right-of-way.

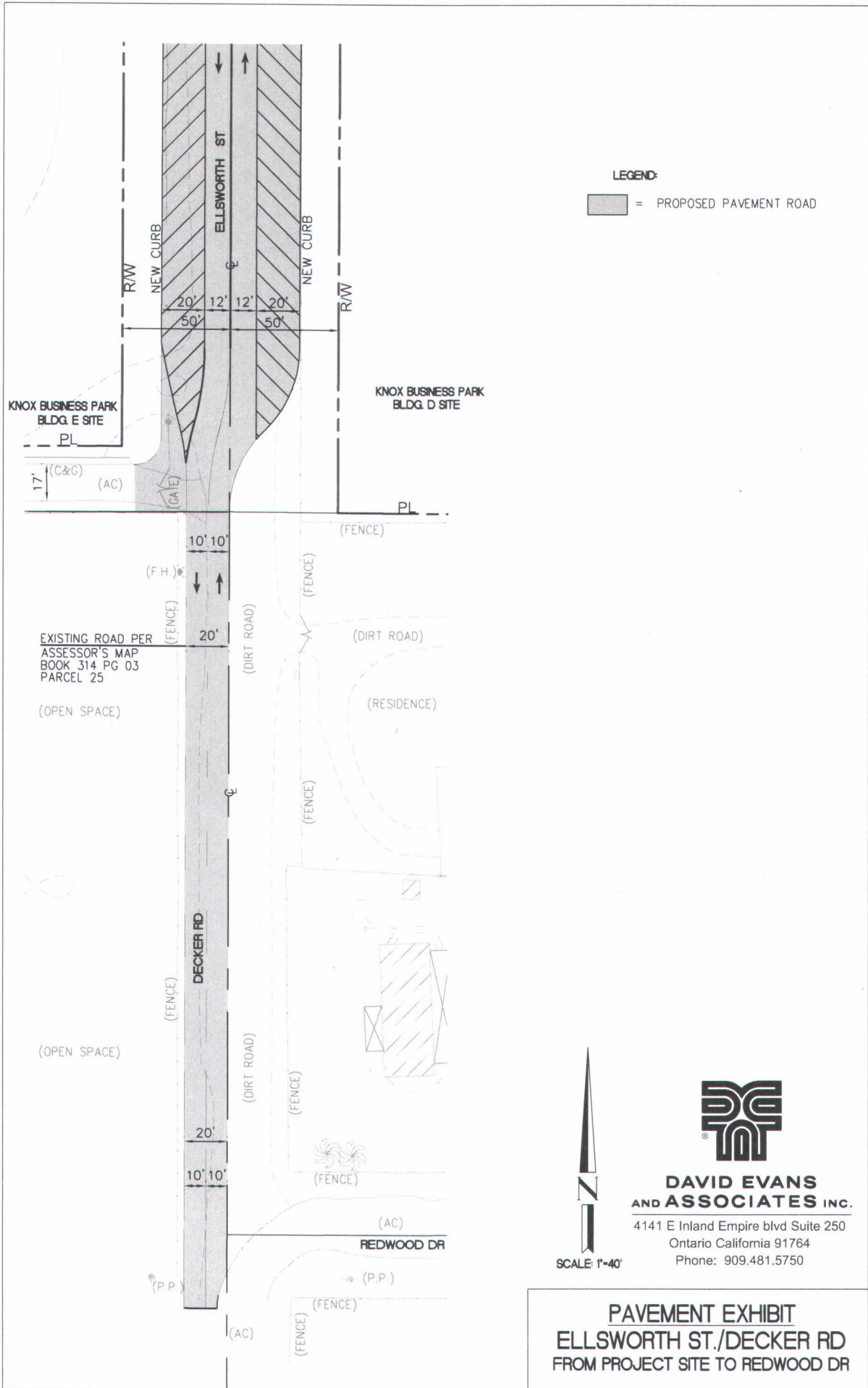


ENLARGED SITE PLAN @ SE CORNER - KNOX III **B**



KNOX BUSINESS PARK - PHASE III & IV
 COUNTY OF RIVERSIDE, CALIFORNIA





Trammell Crow Company

May 18, 2018

Riverside County Planning
4080 Lemon Street
Riverside, CA 92501
Attention: Mr. Russell Brady

Subject: PP25837 & PP25838; Limited Decker Road Repair and Repaving

Mr. Brady,

We understand that the County would like the project applicant to perform limited road repairs and repaving on a 320-foot stretch of Decker Road south of the PP25837 & PP25838 project. This work is requested by the County as a benefit for the residents of Redwood Drive. Residents of Redwood Drive are currently able to use that stretch of Decker Road to access Oleander Avenue. Decker road is currently not paved in that area. The requested asphalt paving will reduce dust generation created by vehicles, and improve the quality of the road resulting in other benefits for the residents. As we have discussed, the applicant is willing to perform the limited Decker Road repair and repaving work. The purpose of this letter is to provide information regarding the scope of work, equipment, duration, and phasing of the limited Decker Road repair and repaving.

I am the Senior Vice President and Development Manager for the applicant. In that position I am responsible for overseeing construction, including site preparation, demolition, and grading on this project. I have nearly 40 years of experience in the construction business, including 25 years of experience as a project manager. I have been project manager in charge of overseeing construction for the applicant for the last 13 years. In my professional experience I have overseen numerous grading jobs, including projects involving blasting and grading procedures similar to those proposed for this project.

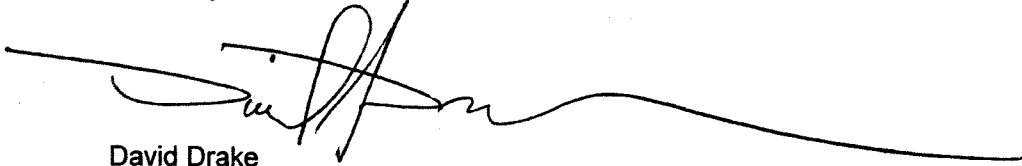
The limited Decker Road repair and repaving is a small job that will take a maximum of two days. The first phase of the work will be grading/excavation. This work is needed to prepare the base for the asphalt paving work. The grading/excavation work will utilize one tractor/loader/backhoe, and will take no more than eight hours to complete. The second phase of the work will be paving. The paving work will utilize one paver, one roller, and one tractor/loader/backhoe, and will take no more than eight hours to complete. Both phases will utilize a noise barrier (6.0 feet height, wall-type) to be erected along the easterly side of Decker Road. The sound barrier be performed following completion of the construction at the PP25837 & PP25838 project.

3501 Jamboree Road, Suite 130 • Newport Beach, CA 92660
Phone (949) 477-4700

4851-6100-7206

We therefore look forward to completing this development and building an important asset for the Community in Riverside County.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Drake', with a long horizontal flourish extending to the right.

David Drake
Senior Vice President
Trammell Crow Company

cc: Haseeb Qureshi, Urban Crossroads



260 E. Baker St. | Suite 200 | Costa Mesa, CA 92626 | (949) 660-1994

urbancrossroads.com

May 16, 2018

Mr. Neal Holdridge
Trammel Crow Company
3501 Jamboree Road, Suite 230
Newport Beach, CA 92660

**SUBJECT: LIMITED DECKER ROAD REPAIRS AND REPAVING FOCUSED AIR QUALITY AND GREENHOUSE GAS
MEMORANDUM**

Dear Mr. Neal Holdridge:

Urban Crossroads, Inc. is pleased to submit this Focused Air Quality Memorandum (Memo) to T&B Planning (Client) for the proposed Limited Decker Road Repairs and Repaving activity.

SUMMARY OF FINDINGS

Results of the Memo indicate the construction activities associated with the repair and repaving of Decker Road would result in less than significant impacts associated with air quality emissions and would be less than the emissions identified in the DEIR for the Knox Business Park Buildings D and E (2017).

PROJECT DESCRIPTION

The project consists of repair and repaving of a portion of Decker Road located between Redwood Drive and Old Oleander Avenue. According to information provided by the project applicant Trammell Crow Company, the section of road to be repaved will be approximately 20 feet in width and approximately 320 feet in length. This repair and repaving project will follow and does not overlap with the construction activities associated with the development of the Knox Business Park Buildings D & E.

PROJECT-RELATED AIR QUALITY

Project specific sources of emissions are estimated utilizing the most recent Road Construction Emissions Model, Version 8.1.0. (RCEM) developed by the Sacramento Metropolitan Air Quality Management District. Although the California Emissions Estimator Model (CalEEMod) is typically utilized for land use development projects in this region, the South Coast Air Quality Management District (SCAQMD) has identified the RCEM as an acceptable emissions modeling program when the use of CalEEMod is not appropriate, as is the case with road repaving projects such as this. Version 8.1.0 of the RCEM estimates emissions using information contained within the 26th edition of Walker's

Mr. Neal Holdridge
Trammel Crow Company
May 16, 2018
Page 2 of 5

Building Estimator's Reference Book (1999). (1) Based on the nature of the project, the repair and repaving of the roadway is designed to improve Redwood Drive residents' route to access Oleander Avenue. As such, only emissions associated with the construction of this road are considered within the scope of this assessment.

AIR QUALITY & GREENHOUSE GAS EMISSIONS

CONSTRUCTION EMISSIONS

Construction activities associated with the Project will result in emissions of VOC, NO_x, CO, SO_x, PM₁₀, PM_{2.5}, and greenhouse gas in the form of CO₂E (carbon dioxide equivalents). Construction related emissions are expected from the following construction activities: Grading and Paving.

The duration of construction activity and equipment is based on information provided by the project applicant, as shown on Tables 1 and 2.

The estimated maximum daily construction emissions for the proposed Project are summarized on Table 3. Detailed construction model outputs are presented in Attachment "A". As calculated and shown, the proposed Project would not exceed the applicable SCAQMD thresholds. As such, no impacts would occur and no mitigation is required. In addition, a review of the Draft Environmental Impact Report indicates the proposed project construction emissions will not exceed those previously projected for the Knox Business Park Buildings D and E (2).

TABLE 1: CONSTRUCTION SCHEDULE

Phase Name	Days
Grading	1
Paving	1

TABLE 2: CONSTRUCTION EQUIPMENT

Activity	Equipment	Number	Hours Per Day
Grading	Tractors/Loaders/Backhoes	1	8
Paving	Pavers	1	8
	Rollers	1	8
	Tractors/Loaders/Backhoes	1	8

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 Trammel Crow Company
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As identified on Table 3, the Limited Decker Road Repairs and Repaving would generate fewer emissions per day for emissions of VOCs, NO_x, CO, SO_x, PM10, and PM2.5 as compared to what was previously analyzed and disclosed in the DEIR.

TABLE 3: LIMITED DECKER ROAD REPAIRS AND REPAVING VS KNOX BUSINESS PARK BUILDINGS D AND E DEIR CONSTRUCTION EMISSIONS

	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM10	PM2.5
Knox Business Park Buildings D and E DEIR						
Maximum Daily Emissions	48.06	80.10	110.59	0.23	18.72	9.78
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Limited Decker Road Repairs and Repaving						
Maximum Daily Emissions	0.92	8.82	8.47	0.01	3.86	0.95
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
New Significant Impacts?	NO	NO	NO	NO	NO	NO

NO_x emissions for the repair and repaving work are approximately 11% of the maximum daily emissions for the Buildings D and E construction. Emissions of the other air pollutants (except PM10) are also approximately 10% of the maximum daily amounts from construction of Buildings D and E. Emissions of PM10 from the repair and repaving work are approximately 20% of the maximum daily emissions from construction of the Buildings D and E. Because the repair and repaving work will be done following the construction on Buildings D & E, they will not aggregate. Even if the limited Decker Road repair and repaving work is performed concurrently with the Buildings D and E construction, the aggregate daily maximum emissions would still be under the SCAQMD emission thresholds for all pollutants, including PM10. Moreover, because the repair and repaving work will last only two days, the total aggregate emissions generated by the repair and repaving work will be negligible in comparison to the project construction as a whole. Therefore, the air emissions resulting from the limited repair and repaving work will not result in any new significant environmental impact or create a substantial increase in the severity of an environmental impact. Thus, the limited repair and repaving work will not create any substantial adverse air quality impact and the inclusion of this work in the project is not significant new information.

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According to the Road Construction Emissions Model (RCEM), the total amount of greenhouse gas emissions is shown in Table 4. As shown, the repair and repaving would result in 0.02 metric tons of CO₂E annually (amortized over 30 years consistent with the DEIR). This increase is negligible in comparison to the total GHG emissions identified in the DEIR for the Knox Business Park Buildings D and E (2017). Furthermore, the addition of the negligible amount of GHG emissions would not hinder the ability of the Knox Business Park Buildings D and E project from demonstrating consistency with the County's Climate Action Plan (CAP).

TABLE 4: LIMITED DECKER ROAD REPAIRS AND REPAVING GREENHOUSE GAS EMISSIONS SUMMARY

Emission Source	Emissions (metric tons)
	Total CO ₂ E
Annual emissions amortized over 30 years	0.02

TRAFFIC IMPACTS

The repair and repaving of the existing road would not result in or induce any substantive traffic impacts as the roadway is already being utilized today and the repair and repaving is being done as a courtesy to existing residents that already use this roadway.

If you have any questions, please contact me directly at (949) 336-5987.

Respectfully submitted,

URBAN CROSSROADS, INC.



Haseeb Qureshi,
Senior Associate

Mr. Neal Holdridge
Trammel Crow Company
May 16, 2018
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REFERENCES

1. Road Construction Emissions Model Version 8.1.0. s.l.: Sacramento County Air Quality Management District, 2018.
2. Planning, T&B. Draft Environmental Impact Report Number 546. *Knox Business Park Buildings D and E*. 2017.
3. South Coast Air Quality Management District. California Emissions Estimator Model. [Online] 2016. [Cited: October 31, 2017.] <http://www.caleemod.com/>.

ATTACHMENT "A" RCEM OUTPUTS

Road Construction Emissions Model, Version 8.1.0

Daily Emission Estimates for -> Dicker Road Repairing

Project Phases (Pounds)	ROG (lbs/day)	CO (lbs/day)	NOx (lbs/day)	PM10 (lbs/day)	Total PM2.5 (lbs/day)	Fugitive Dust PM10 (lbs/day)	Exhaust PM2.5 (lbs/day)	PM2.5 (lbs/day)	SOx (lbs/day)	CO2 (lbs/day)	CH4 (lbs/day)	N2O (lbs/day)	CO2e (lbs/day)
Grubbing/Land Clearing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grading/Excavation	0.40	4.59	2.90	3.86	0.95	3.60	0.26	0.75	0.01	912.69	0.12	0.01	919.65
Drainage/Utilities/Sub-Grade	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving	0.82	8.47	8.82	0.57	0.51	0.00	0.51	0.00	0.01	1,392.95	0.33	0.01	1,405.75
Maximum (pounds/day)	0.82	8.47	8.82	3.86	0.95	3.60	0.51	0.75	0.01	1,392.95	0.33	0.01	1,405.75
Total (tons/construction project)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.76	0.00	0.00	0.77

Total Emission Estimates by Phase for -> Dicker Road Repairing

Project Phases (Tons for all except CO2e, Metric tonnes for CO2e)	ROG (tonnephase)	CO (tonnephase)	NOx (tonnephase)	PM10 (tonnephase)	Total PM2.5 (tonnephase)	Fugitive Dust PM10 (tonnephase)	Exhaust PM2.5 (tonnephase)	PM2.5 (tonnephase)	SOx (tonnephase)	CO2 (tonnephase)	CH4 (tonnephase)	N2O (tonnephase)	CO2e (MT/Phase)
Grubbing/Land Clearing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grading/Excavation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.30	0.00	0.00	0.28
Drainage/Utilities/Sub-Grade	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.46	0.00	0.00	0.42
Maximum (tonnephase)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.46	0.00	0.00	0.42
Total (tons/construction project)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.76	0.00	0.00	0.70

Daily VMT (miles/day)

Phase	Soil	Asphalt	Soil Hauling	Asphalt Hauling	Worker Commute	Water Truck
Grubbing/Land Clearing	0	0	0	0	0	0
Grading/Excavation	0	0	0	0	680	0
Drainage/Utilities/Sub-Grade	0	0	0	0	0	0
Paving	0	0	0	0	400	0

Notes:
 Project Start Year -> 2018
 Project Length (months) -> 0
 Total Project Area (acres) -> 0
 Maximum Area Disturbed/Day (acres) -> 0
 Water Truck Used? -> No

Total Material Imported/Exported Volume (yd/day)

PM10 and PM2.5 estimates assume 50% control of fugitive dust from watering and associated dust control measures if a minimum number of water trucks are specified. Total PM10 emissions shown in column F are the sum of exhaust and fugitive dust emissions shown in Column I are the sum of exhaust and fugitive dust emissions shown in columns J and K. CO2e emissions are estimated by multiplying mass emissions for each GHG by its global warming potential (GWP), 1, .25 and 298 for CO2, CH4 and N2O, respectively. Total CO2e is then estimated by summing CO2e estimates over all GHGs.

PM10 and PM2.5 estimates assume 50% control of fugitive dust from watering and associated dust control measures if a minimum number of water trucks are specified. Total PM10 emissions shown in column F are the sum of exhaust and fugitive dust emissions shown in columns G and H. Total PM2.5 emissions shown in Column I are the sum of exhaust and fugitive dust emissions shown in columns J and K. CO2e emissions are estimated by multiplying mass emissions for each GHG by its global warming potential (GWP), 1, .25 and 298 for CO2, CH4 and N2O, respectively. Total CO2e is then estimated by summing CO2e estimates over all GHGs. The CO2e emissions are reported as metric tons per phase.

Road Construction Emissions Model

Version 8.1.0

Data Entry Worksheet

Note: Required data input sections have a yellow background. Optional data input sections have a blue background. Only areas with a yellow or blue background can be modified. Program defaults have a white background. The user is required to enter information in cells D10 through D24, E28 through G35, and D38 through D41 for all project types. Please use "Clear Data Input & User Overrides" button first before changing the Project Type or begin a new project.

To begin a new project, click this button to clear data previously entered. This button will only work if you opted not to disable macros when loading this spreadsheet.



Decker Road Repaving	2018
Construction Start Year (inclusive)	
Project Type	1
Project Construction Time Working Days per Month	0.06
	22.00
Predominant Soil/Site Type Enter 1, 2, or 3 (for project within "Sacramento County", follow soil type selection cells J18 to J22)	2
Project Length	0.06
Total Project Area	0.18
Maximum Area Disturbed/Day	0.18
Water Trucks Used?	2

Enter a Year between 2014 and 2025 (inclusive)

- 1) New Road Construction - Project to build a roadway from bare ground, which generally requires more site preparation than widening an existing roadway.
- 2) Road Widening - Project to add a new lane to an existing roadway
- 3) Bridge/Overpass Construction - Project to build an elevated roadway, which generally requires some different equipment than a new roadway, such as a crane
- 4) Other Linear Project Type: Non-roadway project such as a pipeline, transmission line, or levee construction

- 1) Sand Gravel - Use for quarternary deposits (Delta/West County)
- 2) Weathered Rock/Earth - Use for Laguna Formation (Jackson Highway area) or the lone formation (Scott Road, Rancho Murieta)
- 3) Bleached Rock - Use for Salt Springs State or Copper Hill Volcanics (Folsom South of Highway 50), Rancho Murieta)

Please note that the soil type instructions, provided in cells E18 to E20 are specific to Sacramento County. Maps available from the California Geologic Survey (see weblink below) can be used to determine soil type outside Sacramento County.

http://www.soservation.ca.gov/cgi-bin/information/geologic_maps/MapIndex.jsp?table=1&map=map04000000

Material Hauling Quantity Input

Material Type	Phase	Haul Truck Capacity (yd ³ / 20 if unknown)	Import Volume (yd ³ /day)	Export Volume (yd ³ /day)
Soil	Grubbing/Land Clearing	20.00	0.00	0.00
	Grading/Excavation	20.00	0.00	0.00
	Drainage/Utilities-Sub-Grade	20.00	0.00	0.00
	Paving	20.00	0.00	0.00
Asphalt	Grubbing/Land Clearing	20.00	0.00	0.00
	Grading/Excavation	20.00	0.00	0.00
	Drainage/Utilities-Sub-Grade	20.00	0.00	0.00
	Paving	20.00	0.00	0.00

Mitigation Options

On-road Fleet Emissions Mitigation	Select "2010 and Newer On-road Vehicles Fleet" option when the on-road heavy-duty truck fleet for the project will be limited to vehicles of model year 2010 or newer.
Off-road Equipment Emissions Mitigation	Select "20% NOx and 45% Exhaust PM reduction" option if the project will be required to use a lower emitting air-road construction fleet. The SMOAQMD Construction Mitigation Program (see www.smoaqmd.com) is required for all off-road equipment used for the project meets CARB Tier 4 Standard. Select "Tier 4 Equipment" option if some or all off-road equipment used for the project meets CARB Tier 4 Standard.
No Mitigation	

The remaining sections of this sheet contain areas that can be modified by the user, although these modifications are optional.

Note: The program's estimates of construction period phase length can be overridden in cells D50 through D53, and F50 through F53.

Construction Periods	User Override of Construction Months		Program Calculated Months		User Override of Phase Starting Date		Program Default Phases Starting Date	
	Start	End	Start	End	Start	End	Start	End
Grubbing/Land Clearing	0.03	0.03	0.03	0.03	10/1/2018	10/1/2018	11/1/2018	11/1/2018
Grading/Excavation	0.00	0.02	0.00	0.02	10/1/2018	10/1/2018	11/1/2018	11/1/2018
Drainage/Utilities/Sub-Grade	0.03	0.01	0.03	0.01	10/2/2018	10/2/2018	11/2/2018	11/2/2018
Totals (Months)			0					

Note: You have entered a non-default starting date. Please provide starting date for all phases, or default values for other phases will be used.

Note: Soil Hauling emission default values can be overridden in cells D61 through D64, and F61 through F64.

Soil Hauling Emissions	User Override of Miles/Round Trip		Program Estimate of Miles/Round Trip		User Override of Truck Round Trips/Day		Program Default Values Round Trips/Day		Calculated Daily VMT	
	Miles/Round Trip	Round Trips/Day	Miles/Round Trip	Round Trips/Day	Miles/Round Trip	Round Trips/Day	Miles/Round Trip	Round Trips/Day	Miles/Round Trip	Round Trips/Day
Miles/round trip - Grubbing/Land Clearing	0.00	0.00	30.00	0	0.00	0	30.00	0	0.00	0.00
Miles/round trip - Grading/Excavation	0.00	0.00	30.00	0	0.00	0	30.00	0	0.00	0.00
Miles/round trip - Drainage/Utilities/Sub-Grade	0.00	0.00	30.00	0	0.00	0	30.00	0	0.00	0.00
Miles/round trip - Paving	0.00	0.00	30.00	0	0.00	0	30.00	0	0.00	0.00

2010+ Model Year Mitigation Option Emission Rates	User Override of ROG		Program Default Values ROG		User Override of NOx		Program Default Values NOx		Calculated ROG		Calculated NOx	
	g/mi	lb/mi	g/mi	lb/mi	g/mi	lb/mi	g/mi	lb/mi	g/mi	lb/mi	g/mi	lb/mi
Grubbing/Land Clearing (grams/mile)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grubbing/Land Clearing (pounds/mile)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grading/Excavation (grams/mile)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grading/Excavation (pounds/mile)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Drainage/Utilities/Sub-Grade (grams/mile)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Drainage/Utilities/Sub-Grade (pounds/mile)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving (grams/mile)	0.07	0.07	0.07	0.07	0.36	0.36	0.36	0.36	0.00	0.00	0.00	0.00
Paving (pounds/mile)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling Emissions	ROG	NOx	CO	SOx	PM10	PM2.5	CO	SOx	PM10	PM2.5	CO2e	CH4
Tons per day - Grubbing/Land Clearing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per const. Period - Grubbing/Land Clearing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per day - Grading/Excavation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per const. Period - Grading/Excavation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per day - Drainage/Utilities/Sub-Grade	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per const. Period - Drainage/Utilities/Sub-Grade	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per day - Paving	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per const. Period - Paving	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Totals tons per construction project												

Note: Asphalt Hauling emission default values can be overridden in cells D67 through D69, and F67 through F69.

Asphalt Hauling Emissions	User Override of Miles/Round Trip		Program Estimate of Miles/Round Trip		User Override of Truck Round Trips/Day		Program Default Values Round Trips/Day		Calculated Daily VMT	
	Miles/Round Trip	Round Trips/Day	Miles/Round Trip	Round Trips/Day	Miles/Round Trip	Round Trips/Day	Miles/Round Trip	Round Trips/Day	Miles/Round Trip	Round Trips/Day
Miles/round trip - Grubbing/Land Clearing	0.00	0.00	30.00	0	0.00	0	30.00	0	0.00	0.00
Miles/round trip - Grading/Excavation	0.00	0.00	30.00	0	0.00	0	30.00	0	0.00	0.00
Miles/round trip - Drainage/Utilities/Sub-Grade	0.00	0.00	30.00	0	0.00	0	30.00	0	0.00	0.00
Miles/round trip - Paving	0.00	0.00	30.00	0	0.00	0	30.00	0	0.00	0.00

2010+ Model Year Mitigation Option Emission Rates	User Override of ROG		Program Default Values ROG		User Override of NOx		Program Default Values NOx		Calculated ROG		Calculated NOx	
	g/mi	lb/mi	g/mi	lb/mi	g/mi	lb/mi	g/mi	lb/mi	g/mi	lb/mi	g/mi	lb/mi
Grubbing/Land Clearing (grams/mile)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grubbing/Land Clearing (pounds/mile)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grading/Excavation (grams/mile)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grading/Excavation (pounds/mile)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Drainage/Utilities/Sub-Grade (grams/mile)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Drainage/Utilities/Sub-Grade (pounds/mile)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving (grams/mile)	0.07	0.07	0.07	0.07	0.36	0.36	0.36	0.36	0.00	0.00	0.00	0.00
Paving (pounds/mile)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling Emissions	ROG	NOx	CO	SOx	PM10	PM2.5	CO	SOx	PM10	PM2.5	CO2e	CH4
Tons per day - Grubbing/Land Clearing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per const. Period - Grubbing/Land Clearing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per day - Grading/Excavation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per const. Period - Grading/Excavation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per day - Drainage/Utilities/Sub-Grade	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per const. Period - Drainage/Utilities/Sub-Grade	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per day - Paving	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per const. Period - Paving	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Totals tons per construction project												

Note: Worker commute default values can be overridden in cells D113 through D118.

Worker Commute Emissions		User Override of Worker Commute Default Values		Default Values	
User Input	Program Estimate of Number of Water Trucks	User Override of Default # Water Trucks	Miles Traveled/Vehicle/Day	Calculated Daily VMT	Calculated Daily VMT
Miles one-way trip	20	20	0.00	0.00	0.00
One-way trips/day	2	2	0.00	0.00	0.00
Grubbing/Land Clearing	17	17	0.00	0.00	0.00
No. of employees Grading/Excavation	14	14	0.00	0.00	0.00
No. of employees Draining/Utilities/Sub-Grade	10	10	0.00	0.00	0.00
No. of employees Paving					

Emission Rates	ROG	CO	NOx	PM10	PM2.5	SOx	CO2	CH4	N2O	CO2e
Grubbing/Land Clearing (grams/mile)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grading/Excavation (grams/mile)	0.03	1.33	0.15	0.05	0.02	0.00	383.83	0.01	0.01	385.91
Paving (grams/mile)	0.00	0.00	0.00	0.00	0.00	0.00	386.00	0.00	0.00	386.00
Draining/Utilities/Sub-Grade (grams/mile)	0.00	0.00	0.00	0.00	0.00	0.00	386.00	0.01	0.01	388.01
Grubbing/Land Clearing (grams/trip)	1.17	3.21	0.26	0.00	0.00	0.00	87.83	0.02	0.01	91.49
Grading/Excavation (grams/trip)	0.00	0.00	0.00	0.00	0.00	0.00	87.83	0.00	0.00	87.83
Draining/Utilities/Sub-Grade (grams/trip)	1.17	3.21	0.26	0.00	0.00	0.00	87.83	0.02	0.01	91.49
Paving (grams/trip)	0.00	0.00	0.00	0.00	0.00	0.00	87.83	0.02	0.01	91.49
Pounds per day - Grubbing/Land Clearing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per const. Period - Grubbing/Land Clearing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pounds per day - Grading/Excavation	0.03	1.33	0.15	0.05	0.02	0.00	596.99	0.02	0.01	600.38
Tons per const. Period - Grading/Excavation	0.00	0.00	0.00	0.00	0.00	0.00	596.99	0.02	0.01	600.38
Pounds per day - Paving	0.00	0.00	0.00	0.00	0.00	0.00	386.00	0.00	0.00	386.00
Tons per const. Period - Paving	0.00	0.00	0.00	0.00	0.00	0.00	386.00	0.00	0.00	386.00
Pounds per day - Draining/Utilities/Sub-Grade	0.00	0.00	0.00	0.00	0.00	0.00	386.00	0.01	0.01	388.01
Tons per const. Period - Draining/Utilities/Sub-Grade	0.00	0.00	0.00	0.00	0.00	0.00	386.00	0.01	0.01	388.01
Pounds per day - Paving	0.00	1.31	0.14	0.04	0.02	0.00	351.17	0.01	0.01	353.16
Tons per const. Period - Paving	0.00	1.31	0.14	0.04	0.02	0.00	351.17	0.01	0.01	353.16
Total tons per construction project	0.00	0.00	0.00	0.00	0.00	0.00	0.12	0.00	0.00	0.12
							0.31	0.00	0.00	0.31

Note: Water Truck default values can be overridden in cells D146, and F146 through F148.

Water Truck Emissions		User Override of Program Estimate of Number of Water Trucks		Default Values	
User Input	Program Estimate of Number of Water Trucks	User Override of Default # Water Trucks	Miles Traveled/Vehicle/Day	Calculated Daily VMT	Calculated Daily VMT
Grubbing/Land Clearing - Exhaust	0	0	40.00	0.00	0.00
Grading/Excavation - Exhaust	0	0	40.00	0.00	0.00
Draining/Utilities/Sub-Grade	0	0	40.00	0.00	0.00
Paving					

2010+ Model Year Mitigation Option Emission Rates	ROG	CO	NOx	PM10	PM2.5	SOx	CO2	CH4	N2O	CO2e
Grubbing/Land Clearing (grams/mile)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grading/Excavation (grams/mile)	0.07	0.36	1.51	0.10	0.04	0.02	1,590.26	0.00	0.05	1,605.93
Paving (grams/mile)	0.07	0.36	1.51	0.10	0.04	0.02	1,590.26	0.00	0.05	1,605.93
Draining/Utilities/Sub-Grade (grams/mile)	0.07	0.36	1.51	0.10	0.04	0.02	1,590.26	0.00	0.05	1,605.93
Pounds per day - Grubbing/Land Clearing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per const. Period - Grubbing/Land Clearing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pounds per day - Grading/Excavation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per const. Period - Grading/Excavation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pounds per day - Draining/Utilities/Sub-Grade	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per const. Period - Draining/Utilities/Sub-Grade	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pounds per day - Paving	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tons per const. Period - Paving	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total tons per construction project	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Note: Fugitive dust default values can be overridden in cells D171 through D173.

Fugitive Dust		User Override of Max Acreage Disturbed/Day		Default	
Fugitive Dust - Grubbing/Land Clearing	Maximum Acreage/Day	PM10 pounds/day	PM10 tons per period	PM2.5 pounds/day	PM2.5 tons per period
Fugitive Dust - Grubbing/Land Clearing	0.18	0.00	0.00	0.00	0.00
Fugitive Dust - Grading/Excavation	0.18	3.80	0.00	0.75	0.00
Fugitive Dust - Draining/Utilities/Sub-Grade	0.00	0.00	0.00	0.00	0.00

Paving	Default		Mitigation Option		Default										
	Override of Default Number of Vehicles	Number of Vehicles	Override of Default Equipment Tier (applicable only when "Tier 4 Mitigation" Option Selected)	Equipment Tier	Type	ROG	CO	NOx	PM10	PM2.5	SOx	CO2	CH4	N2O	CO2e
	Program estimate					pounds/day	pounds/day	pounds/day	pounds/day	pounds/day	pounds/day	pounds/day	pounds/day	pounds/day	pounds/day
				Model Default Tier	Aerial Lifts	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Compactors	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Bobcat/Rops	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Cement and Mortar Mixers	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Concrete/Industrial Saws	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Cranes	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Crawler Tractors	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Crushing/Proc. Equipment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Excavators	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Drillbits	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Generators	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Graders	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Off-Highway Tractors	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Off-Highway Trucks	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Other Construction Equipment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Other General Industrial Equipment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Other Material Handling Equipment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	0.00			Model Default Tier	Pavers	0.32	2.84	3.50	0.17	0.16	0.00	458.58	0.14	0.00	463.33
				Model Default Tier	Wiring Equipment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Generators	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Pressure Washers	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Pumps	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	1.00			Model Default Tier	Rollers	0.26	1.96	2.52	0.17	0.16	0.00	267.21	0.08	0.00	269.98
				Model Default Tier	Rough Terrain Forklifts	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Rubber Tired Dozers	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Rubber Tired Loaders	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Scrapers	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Motor Graders	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	0.00			Model Default Tier	Skid Steer Loaders	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Surfacing Equipment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Sweepers/Scrubbers	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	1.00			Model Default Tier	Tractors/Loaders/Backhoes	0.27	2.36	2.66	0.19	0.17	0.00	316.00	0.10	0.00	319.27
				Model Default Tier	Trenchers	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				Model Default Tier	Welders	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User-Defined Off-road Equipment						ROG	CO	NOx	PM10	PM2.5	SOx	CO2	CH4	N2O	CO2e
	0.00			Equipment Tier	Type	pounds/day	pounds/day	pounds/day	pounds/day	pounds/day	pounds/day	pounds/day	pounds/day	pounds/day	pounds/day
	0.00			N/A		0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	0.00			N/A		0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	0.00			N/A		0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	0.00			N/A		0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	0.00			N/A		0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
						0.85	7.16	8.66	0.53	0.46	0.01	1,041.76	0.32	0.01	1,052.56
						0.00	0.00	0.00	0.00	0.00	0.00	0.34	0.00	0.00	0.35
Total Emissions all Phases (ems per construction period) =>															
						0.00	0.00	0.00	0.00	0.00	0.00	0.45	0.00	0.00	0.45

Equipment default values for horsepower and hours/day can be overridden in cells D391 through D424 and F391 through F424.

Equipment	User Override of Horsepower	Default Values Horsepower	User Override of Hours/day	Default Values Hours/day
Aerial Lifts		53		8
Air Compressors		78		8
Bore/Dial Rigs		206		8
Cement and Mortar Mixers		9		8
Concrete/Industrial Saws		91		8
Cranes		226		8
Crawler Tractors		208		8
Crushing/Proc. Equipment		95		8
Excavators		163		8
Forklifts		89		8
Generator Sets		84		8
Graders		175		8
GH-Highway Tractors		123		8
GH-Highway Trucks		400		8
Other Construction Equipment		172		8
Other General Industrial Equipment		86		8
Other Material Handling Equipment		167		8
Pavers		126		8
Paving Equipment		131		8
Plate Compactors		8		8
Pressure Washers		13		8
Pumps		84		8
Rollers		81		8
Rough Terrain Forklifts		100		8
Rubber Tired Dozers		255		8
Rubber Tired Loaders		200		8
Scrapers		362		8
Signal Boards		5		8
Skid Steer Loaders		65		8
Surfacing Equipment		254		8
Sweepers/Scrubbers		84		8
Tractors/Loaders/Backhoes		96		8
Trenchers		81		8
Welders		46		8

END OF DATA ENTRY SHEET

ATTACHMENT "B" QUALIFICATIONS



HASEEB QURESHI, MES

SENIOR ASSOCIATE, URBAN CROSSROADS, INC.
hqureshi@urbanxroads.com



BACKGROUND

Haseeb Qureshi has been working in the field of air quality, climate change, health risk assessment, and vehicular and non-motorized transportation planning and analysis since 2006. In this time he has authored numerous air quality, health risk, greenhouse gas, traffic impact analysis studies, and provided input into project design to promote sustainability and walkability for projects ranging from small development projects to citywide General Plan updates and large scale specific plans. Recent activities include efforts to inventory greenhouse gas emissions for various projects and provide recommendations to reduce carbon impacts through innovative mitigation strategies. Mr. Qureshi earned his Master of Science degree in Environmental Studies from California State University, Fullerton and his Bachelor of Arts degree in Environmental Analysis & Design from University of California, Irvine. Mr. Qureshi is also proficient in the use of unique software tools such as CalEEMod, AERMOD, ISCST3, CALINE4 and EMFAC.

EDUCATION

M.S. - Environmental Studies

California State University, Fullerton • May, 2010

B.A. – Environmental Analysis and Design

University of California, Irvine • June, 2006

AFFILIATIONS

AEP Association of Environmental Planners

AWMA Air and Waste Management Association

ASTM American Society for Testing and Materials

SELECTED PROJECT EXPERIENCE

Huntington Beach Walmart AQ, GHG, and HRA Analysis

City of Huntington Beach • July, 2011

Shelter Island Boat Launching Facility AQ and GHG Analysis

City of San Diego • August, 2013

March Business Center AQ, GHG, and HRA Analysis

City of Moreno Valley • October, 2011

@ The Boulevard Development AQ and GHG Analysis

City of Hayward • August, 2013

Rio Rancho Towne Center AQ, GHG, and HRA Analysis

City of Pomona • July, 2012

Santee Walmart Expansion Project AQ, GHG, and HRA Analysis

City of Santee • June, 2012

TTM No. 36391 (Ter Maaten) AQ, GHG, and HRA Analysis

City of Jurupa Valley • May, 2012

University Crossings Apts. AQ and GHG Analysis

County of San Bernardino • March, 2012

Saddleback/Irvine Valley College Master Plan AQ and GHG Analysis

County of Orange • August, 2013

Watson Industrial Park AQ, GHG, and HRA Analysis

City of Chino • March, 2015

Arcadia Logistics Center AQ, GHG, and HRA Analysis

City of Arcadia • September, 2015

Sierra Lakes Commerce Center AQ, GHG, and HRA Analysis

City of Fontana • April, 2015

Rancho Palma AQ, GHG, and HRA Analysis

City of San Bernardino • November, 2015

Pomona Hyatt Place + Hyatt House AQ and GHG Analysis

City of Pomona • February, 2016

Moreno Valley Logistics Center AQ, GHG, HRA, and Energy Analysis

City of Moreno Valley • March, 2016

Space Center AQ, GHG, and HRA Analysis

City of Jurupa Valley • June, 2016

Lincoln Landing AQ and GHG Analysis

City of Hayward • June, 2016

Benton Road Residential AQ and GHG Analysis

County of Riverside • November, 2016

El Centro Aquatic Center AQ and GHG Analysis

City of El Centro • November, 2016



May 17, 2018

Mr. Neal Holdridge
Trammell Crow Company
3501 Jamboree Road, Suite 230
Newport Beach, CA 92660

SUBJECT: LIMITED DECKER ROAD REPAIRS AND REPAVING NOISE MEMORANDUM

Dear Mr. Neal Holdridge:

Urban Crossroads, Inc. is pleased to submit this Noise Memorandum for the Limited Decker Road Repairs and Repaving ("Project"), which is located north of Redwood Drive and south of Old Oleander Road in unincorporated County of Riverside.

SUMMARY OF FINDINGS

The results of this Noise Memorandum indicate the construction noise levels associated with the repaving of Decker Road will result in *less than significant* impacts with the Project's temporary noise barrier. The construction noise levels associated with the Limited Decker Road Repairs and Repaving do not result in a new environmental impact or a substantial increase in the severity of an environmental impact previously identified in the *Knox Business Park Noise Impact Analysis* (Urban Crossroads, Inc., January 2017).

PROJECT DESCRIPTION

The Project consists of repair and repaving of a portion of Decker Road located between Redwood Drive and Old Oleander Avenue. According to information provided by the Project applicant, Trammel Crow Company, the section of road to be repaved will be approximately 20 feet in width and approximately 320 feet in length. This repair and repaving Project will follow and does not overlap with the construction activities associated with the development of the Knox Business Park Buildings D and E. Based on the nature of the Project, the repair and repaving of the roadway is designed to improve residents' route to access Oleander Avenue.

CONSTRUCTION NOISE LEVELS

The construction noise analysis provided herein has been prepared consistent with the methodology used in the *Knox Business Park Noise Impact Analysis* prepared by Urban Crossroads, Inc. (January 2017), and the construction information provided in the *Limited Decker Road Repairs and Repaving Focused Air Quality Memorandum* prepared by Urban Crossroads, Inc. (May 2018).

Table 1 shows the highest reference construction noise levels used in this analysis and the resulting noise level at distances ranging from 85 to 221 feet from the repair and repaving activities on Decker Road to the nearby residential homes on Redwood Road. As shown on Table 1, the highest construction noise

levels at the closest residential home, located at the northeast corner of Decker Road and Redwood Drive, will approach 69.4 dBA Leq. Construction activities are anticipated to occur over a total of two days; with one day of tractor/loader/backhoe use for grading, and one day with paver, roller, and tractor/loader/backhoe use for paving.

TABLE 1: CONSTRUCTION NOISE LEVELS

Reference Construction Activity ¹	Reference Noise Level @ 50 Feet (dBA Leq)
Tractors/Loaders/Backhoes	74.0
Pavers	74.0
Rollers	73.0
Peak Reference Noise Level at 50 Feet (dBA Leq):	74.0

Receiver Location	Distance To Construction Activity (Feet) ²	Distance Attenuation (dBA Leq) ³	Estimated Noise Barrier Attenuation (dBA Leq) ⁴	Construction Noise Level (dBA Leq)
R1	183'	-11.3	0.0	62.8
R2	85'	-4.6	0.0	69.4
R3	146'	-9.3	0.0	64.7
R4	221'	-12.9	0.0	61.1

¹ Reference construction noise levels obtained from the FHWA's Roadway Construction Noise Model, January 2006.

² Distance from the nearest point of construction activity to the nearest receiver.

³ Point (stationary) source drop off rate of 6.0 dBA per doubling of distance.

⁴ Estimated barrier attenuation from existing barriers (if any) in the Project study area.

CONSTRUCTION NOISE LEVEL THRESHOLDS

Consistent with the significance criteria used in the *Knox Business Park Noise Impact Analysis* prepared by Urban Crossroads, Inc. (January 2017), the Project construction noise levels are evaluated based on a threshold of 65 dBA Leq. Table 2 shows the construction noise levels would be reduced to 64.5 dBA Leq and lower, and will satisfy the 65 dBA Leq construction noise level threshold with the Project's temporary noise barrier. Further, the temporary noise barrier will also provide barrier attenuation for receiver location R1, which results in reduced construction noise levels approaching 58.2 dBA Leq. Temporary noise barrier attenuation calculations are provided in Appendix A for the minimum 6-foot high barrier, and the temporary noise barrier location is shown on Exhibit A.

TABLE 2: CONSTRUCTION NOISE LEVELS WITH NOISE BARRIER

Receiver Location ¹	Const. Noise Levels (dBA Leq)			With Temporary Noise Barriers		
	Peak Activity (dBA Leq) ²	Threshold (dBA Leq) ³	Threshold Exceeded? ⁴	Attenuation (dBA Leq)	Noise Levels (dBA Leq)	Threshold Exceeded? ⁴
R1	62.8	65	No	-4.6	58.2	No
R2	69.4	65	Yes	-4.9	64.5	No
R3	64.7	65	No	-	-	No
R4	61.1	65	No	-	-	No

¹ See Exhibit A for the receiver and construction activity locations.

² Estimated paving construction noise levels during peak operating conditions, as shown on Table 1.

³ Construction noise level threshold.

⁴ Do the estimated Project construction noise levels meet the construction noise level thresholds?

CONCLUSIONS

The analysis indicates the Project construction noise levels associated with the repaving of Decker Road will result in *less than significant* impacts with a 6-foot high temporary noise barrier for the residential home on the northeast corner of Decker Road and Redwood Drive. The findings of this Noise Memorandum are consistent with those of the *Knox Business Park Noise Impact Analysis* (January 2017), which also identified 6-foot high temporary noise barrier during construction for residential homes on Redwood Road. Therefore, the construction noise levels associated with the Limited Decker Road Repairs and Repaving do not result in a new environmental impact or a substantial increase in the severity of an environmental impact previously identified in the *Knox Business Park Noise Impact Analysis*.

Respectfully submitted,

URBAN CROSSROADS, INC.

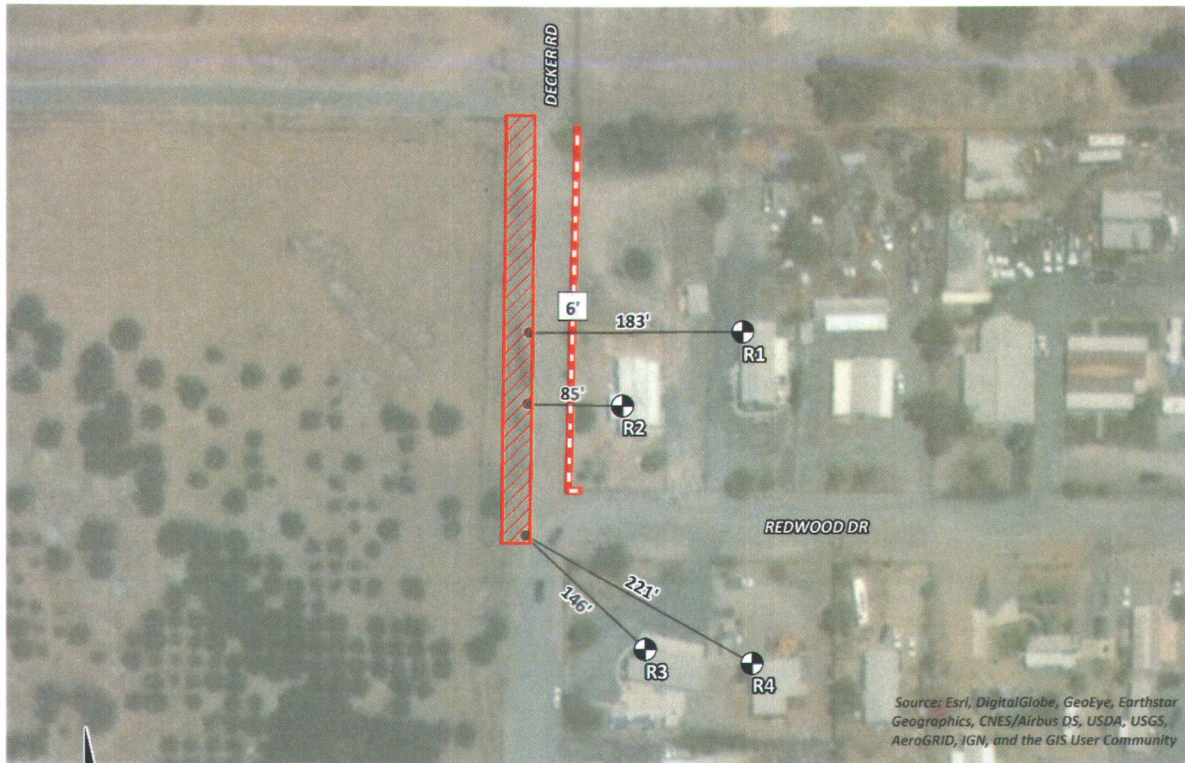


Bill Lawson, P.E., INCE
 Principal



Alex Wolfe, INCE
 Analyst

EXHIBIT A: CONSTRUCTION ACTIVITY AND NOISE BARRIER LOCATIONS



LEGEND:

- Receiver Locations
- Construction Activity
- Distance from receiver to construction activity (in feet)
- 6' Temporary Noise Barrier Height (in feet)
- Temporary Noise Barrier

Mr. Neal Holdridge
Trammell Crow Company
May 17, 2018
Page 5 of 6

QUALIFICATIONS

The contents of this Noise Memorandum represent an accurate depiction of the noise environment and impacts associated with the proposed Limited Decker Road Repairs and Repaving Project. The information contained in this noise study report is based on the best available data at the time of preparation. If you have any questions, please contact me directly at (949) 336-5979.

BILL LAWSON, P.E., INCE

Principal
URBAN CROSSROADS, INC.
260 E. Baker Street, Suite 200
Costa Mesa, CA 92626
(949) 336-5979
blawson@urbanxroads.com

EDUCATION

Master of Science in Civil and Environmental Engineering
California Polytechnic State University, San Luis Obispo • December, 1993

Bachelor of Science in City and Regional Planning
California Polytechnic State University, San Luis Obispo • June, 1992

PROFESSIONAL REGISTRATIONS

PE – Registered Professional Traffic Engineer – TR 2537 • January, 2009
AICP – American Institute of Certified Planners – 013011 • June, 1997–January 1, 2012
PTP – Professional Transportation Planner • May, 2007 – May, 2013
INCE – Institute of Noise Control Engineering • March, 2004

PROFESSIONAL AFFILIATIONS

ASA – Acoustical Society of America
ITE – Institute of Transportation Engineers

PROFESSIONAL CERTIFICATIONS

Certified Acoustical Consultant – County of Orange • February, 2011
FHWA-NHI-142051 Highway Traffic Noise Certificate of Training • February, 2013