City of Rialto

Renaissance Specific Plan Amendment Final Recirculated Subsequent Environmental Impact Report

November 2016

SCH# 2006071021

Kimley»Horn

RENAISSANCE SPECIFIC PLAN AMENDMENT

Final Recirculated Subsequent Environmental Impact Report

Environmental Assessment Review No. 16-55

(State Clearinghouse No. 2006071021)

Airport Specific Plan Amendment No. 6

Renaissance Specific Plan Amendment No. 3

Tentative Parcel Map No. 19779

Conditional Development Permit No. 823

Conditional Development Permit No. 825

Development Agreement No. 16-01

NOVEMBER 2016

Prepared By:

Kimley»Horn

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1 INTRODUCTION

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, the City of Rialto, as the lead agency, has evaluated the comments received on the Renaissance Specific Plan Recirculated Draft Subsequent Environmental Impact Report (Recirculated Draft SEIR). The responses to the comments and other documents comprise the Final Recirculated Subsequent Environmental Impact Report (Final SEIR) for use by the City of Rialto in its review.

The Final SEIR consists of components listed below.

- Recirculated Draft SEIR;
- Recirculated Draft SEIR Appendices;
- Responses to Comments on the Recirculated Draft SEIR; and
- Recirculated Draft SEIR Errata.

This document contains the Responses to Comments on the Recirculated Draft SEIR and the Recirculated Draft SEIR Errata. The Recirculated Draft EIR and Recirculated Draft EIR Appendices are incorporated by reference.

The Final SEIR is organized into the following sections:

- **Section 1, Introduction:** Provides an introduction and overview of the document.
- **Section 2, Responses to Comments:** Includes reproduction of comments received during the Recirculated Draft SEIR public review period, along with detailed responses. Provides a list of the agencies, organizations, and individuals that commented on the Recirculated Draft SEIR. Copies of all the letters received regarding the Recirculated Draft EIR are included in Appendix A.
- **Section 3, Errata:** Includes an addendum listing corrections, refinements, and clarifications on the Recirculated Draft SEIR that have been incorporated. Text changes resulting from comments on the Recirculated Draft SEIR are indicated by underlined (underlined) for text additions and strike out (~~strike out~~) for deleted text.

Because of its length, the text of the Recirculated Draft SEIR is not included with these written responses; however, it is included by reference as part of this Final SEIR. None of the corrections or clarifications to the Recirculated Draft SEIR identified in this document constitutes “significant new information” pursuant to Section 15088.5 of the CEQA Guidelines. As a result, a further recirculation of the Draft SEIR is not required.

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2 RESPONSES TO COMMENTS

This chapter includes a reproduction of comments received during the Recirculated Draft SEIR public review period. Comments are presented in their original format in Appendix A, along with annotations that identify each comment letter.

Where the same comment has been made more than once, a response may direct the reader to an earlier numbered comment and response so as to avoid repetition. Where a response requires revisions to the Recirculated Draft SEIR, the revisions are explained here and shown in the Final SEIR.

2.1 LIST OF AUTHORS

Comments on the Recirculated Draft SEIR were received from the following agencies, organizations, and individuals. Letters are arranged by category, within each category, letters are arranged by date received, and then alphabetically. Each comment letter has been assigned a number, as indicated below:

Written comments were received by the following agencies and individuals.

State Agencies (SA)

SA1 Department of Transportation, District 8: October 27, 2016

Local Agencies (LA)

LA1 San Bernardino County Department of Public Works: November 7, 2016

LA2 Rialto Unified School District: October 16, 2016

Organizations (OR)

OR1A Lozeau Drury LLP on behalf of Laborers International Union North America, Local Union 783: November 10, 2016

OR1 Lozeau Drury LLP on behalf of Laborers International Union North America, Local Union 783: August 19, 2016

General Public (GP)

GP1 John Wang: October 5, 2016

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Comment Number	Comment	Response
State Agencies		
Department of Transportation, District 8: October 27, 2016		
SA1-1	<u>Smart Growth Principles</u> Caltrans supports infill and smart growth development. Based on its place-type, design characteristics, potential impacts, and proposed mitigations, the Department feels that this project is not representative of the smart growth principles and the state's goals with smart-growth land-use changes and multi-modal transportation planning and funding. This project will likely negatively impact air quality and public health in the region due to land uses necessitating the growth of trucking. We question the land use compatibility of locating housing in such close proximity to warehousing and recommend the use of public park space along Linden Avenue and other major corridors to act as a buffer to mitigate negative air quality impacts. We are, however, in support of several greenhouse gas reduction mitigation measures, which include: • The use of green building materials. • Utilizing energy efficiency measures such as efficient lighting, windows, heating and cooling, • insulation, and cool roofs. • The installation of solar photovoltaic panels and electric vehicle charging stations. • The use of water efficient landscapes, irrigation and the use of reclaimed water. • Provision of bicycle racks in convenient locations.	The City acknowledges and appreciates this comment. The project is an Amendment to adopted 2010 Renaissance Specific Plan. The purpose of the Amendment is to relocate all residential land uses east of Linden Avenue to create a better buffer between industrial and residential uses than the current 2010 Specific Plan. In addition, 30’ buffers are provided on either side of Linden Avenue to help buffer the two uses, and truck traffic (excluding local deliveries) is prohibited along Linden Avenue. Appendix B of the amended Renaissance Specific Plan provides a General Plan consistency analysis including Goal 4-1 of the General Plan which states: Provide transportation improvements to reduce traffic congestion associated with regional and local trip increases. The amended Specific Plan is consistency with this goal because the Bicycle and Pedestrian Circulation Plan of the Specific Plan, includes the comprehensive system of pedestrian and bicycle routes and trails that would provide viable connections throughout Renaissance and would also connect to the City’s routes and trails system. Within the Village, off-street (paseo, sidewalks), a multi-use trail, and on-street (bicycle lanes and routes) pedestrian systems are provided to allow convenient and safe non-vehicular circulation. In addition, sidewalks in the non-residential areas of the Specific Plan, which are detailed on each of the street sections contained in the Specific Plan, provide a comprehensive system of pedestrian movement. The street sections and development standards contained in the Specific Plan detail the separations (e.g., parkways, buffers) and setbacks from the roadways that are designed to protect pedestrians from vehicular activity. The roadway system is also designed to be pedestrian friendly and walkable. Additionally, the mix of residential and non-residential uses allows residents of Renaissance to

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		live, work, shop, walk, and gather, thereby reducing the need for personal or public transportation. Furthermore, the project involves the redevelopment of an underutilized, derelict and contaminated infill site, which is immediately adjacent to, and accessible from SR-210 and is entirely surrounded by developed uses. As a result of the extensive transportation network in this part of western San Bernardino County, the project site is located in one of the largest warehouse and distribution regions in the U.S. A large portion of the project is comprised of light-industrial and warehouse uses, consistent with the site's accessibility and the market and existing uses in the region. Regional and local planning encourages this type of infill and redevelopment project that enhances existing land use patterns and benefits existing employment populations. By focusing resources and development in an infill land area that has been previously developed, the project takes development pressure off of further outlying, undeveloped parcels - parcels that, unlike the project site, are not surrounded by existing development, an extensive transportation network, infrastructure, and a warehouse market. Accordingly, the project promotes a smart land use pattern and ultimately reduces greenhouse gas emissions in the process. The project complies with SCAG's Compass Blueprint "2% Strategy" by concentrating growth in an area near freeways and transit routes, in an existing city center, and by fulfilling its principles regarding focusing growth in existing and emerging centers and along major transportation corridors and creating significant areas of mixed use development and walkable communities. Additionally, the project will be subject to the new 2016 California Green Standards Code which will require additional energy and water efficient measures.
SA1-2	We recommend the City review the project area land uses to identify locations where bicycle and pedestrian paths, high-density housing, high-quality transit, and mixed-use land uses centered	The City acknowledges and appreciates this comment. The proposed project is consistent with this comment as it would house approximately 3,963 residents and would allow residents the

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	around transit can be accommodated. We would encourage the City to consider amending the Specific Plan to allow for mixed-uses within high density residential, medium high density residential, Town Center and Corporate Center uses. Mixed land uses and increased densities have been found to be successful in reducing VMT significantly, even in suburban locations. Providing housing in close proximity to jobs, retail and multi-modal transportation would satisfy the Smart Mobility principles of Location Efficiency and Reliable Mobility, as discussed in the Executive Summary of the Smart Mobility Framework[i]. [i]http://www .dot.ca.gov/hq /tpp/offices/o cp/documents/smf files/SMF handbook 062210.pdf	opportunity to live, work, and play in the immediate area. This reduces the need to use the automobile, which in turn reduces congestion, improves air quality, fosters walking, and improves overall health and wellness. The proposed project would facilitate walk-to-work, walk-to-shop, and walk-to-play opportunities by offering open spaces, paseos, walkable streets, proximity of uses, strategically located recreational facilities, and a desirable range of amenities. The Renaissance Specific Plan Amendment is a significant opportunity for the City to achieve many goals described in its General Plan, such as providing housing types suitable for a variety of lifestyles and incomes. The Renaissance Specific Plan accommodates a range of living opportunities including detached residential homes, small-lot detached homes, contemporary townhouses, and condominiums to accommodate a mix of residential housing types that serve a range of lifestyles, including first-time buyers, young singles and couples, families, empty-nesters, and seniors.
SA1-3	Freeway Commercial and Freeway Incubator uses, although integrated with the transportation system currently in place, will lead to increased VMT due to their regional shopping and automobile orientation. Despite the suggestion of creating a pedestrian-friendly environment, the site plan for the Town Center exemplifies the traditional power center design that is not pedestrian-friendly due the number of parking stalls required- around 1,500 more than required- and the distance between certain pads and major stores within the Center. By reducing parking and incentivizing bicycle and pedestrian travel by integrating the shops to paths and the street, VMT can be reduced and livability can be increased. A reduction in parking can also reduce the distance between shops, making it more pedestrian-friendly. Further, integrating shops around a high-quality transit station[ii] can mitigate the need for parking as well as VMT. We also encourage the use of solar photovoltaic shade structures in the Town Center parking lots to provide pedestrian-friendly shading	The City acknowledges and appreciates this comment. Please see Responses SA-1 and SA-2 above. The proposed project, including the commercial areas, is consistent with the City's current parking requirements. Future developers will be encouraged to use solar shade parking structures to provide electricity for businesses and electric vehicles as feasible depending on the types of developments and tenants that occupy the site. No building tenants or building designs are known at this time.

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	and environmentally-friendly electricity generation for businesses and electric vehicle. [ii]Per SB 743, "a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes. during peak commute hours".	
SA1-4	<u>Multimodal Accessibility</u> Caltrans is committed to ensuring that a multimodal transportation system serves every local development project. Planning facilities and policies for pedestrians, cyclists, transit riders and travel demand management will encourage more multimodal trips. As a result, by offering these measures, projects can reduce congestion, VMT, greenhouse gas emissions, and our State's effect on climate change.	The City acknowledges and appreciates this comment. However, this comment does not raise an issue that is at variance with the content of the SEIR which calls for pedestrian, bicycle and transit facilities. This comments will be included as part of the Final SEIR and will be provided to the City's decision making bodies for their review and consideration.
SA1-5	Referring to the City of Rialto General Plan Circulation Chapter, Exhibits 4.2- Transit and Rail Routes, and 4.4- Bicycle Routes, do not reflect the needs of a multi-modal circulation system within the Specific Plan area. We therefore offer suggestions on bicycle and transit routes below, in addition to further pedestrian safety and travel demand management policies and programs. A multi-modal transportation system is integral to the livability and accessibility of future residents, customers and employees within the Specific Plan area. We therefore support the following City of Rialto General Plan goals and policies: • Policy 2-:35.2: Require that new development projects incorporate design features that encourage ridesharing, transit use, park and ride facilities, and bicycle and pedestrian circulation. • Policy 2-38.3: Provide enhanced bicycle and walking infrastructure, and support public transit, including public bus service, the Metrolink, and the potential for Bus Rapid Transit (BRT).	The Renaissance Specific Plan provides a range of housing, employment, and retail opportunities with the specific plan area. The industrial and employment uses are largely contained in the west and north ends of the project area. The residential, park, and school facilities clustered east of Linden which provides a buffer from more intense land uses. Please see Response SA1-1 regarding a description of the Bicycle and Pedestrian Circulation Plan.

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	• Goal 4-6: Provide for all residents and businesses to have equal access to reliable and convenient public transit services [and all Policies therein]. • Goal 4-8: Establish and maintain a comprehensive system of pedestrians and bicycle routes that provide viable connections throughout the City [and all Policies therein]. • Goal 4-9: Promote walking [and all Policies therein].	

SA1-6	Given the afore mentioned State and Local polices, the Rialto Renaissance Fee Program should be reviewed to include multi-modal transportation funding at both intersections and within roadway segments. In Its current form it could potentially fund bicycle, pedestrian and transit-oriented improvements at intersections. Including a multi-modal fee program within the Renaissance Specific Plan would provide an opportunity to fund the projects alluded to within the City of Rialto General Plan, which can include bicycle and pedestrian trails, bus facilities, and Bus Rapid Transit systems within the Specific Plan area. We offer the following recommendations pertaining to each mode:
	• Pedestrians- we recommend the following measures to improve pedestrian safety:
	  ○ Striping high-visibility crosswalks at all intersections.
	  ○ Constructing curb bulbouts to reduce crossing distance and increase pedestrian safety within the residential, school, park, commercial and town center areas.
	  ○ Constructing mid-block crossings with raised median islands at park locations and commercial areas.
	  ○ Traffic calming within residential areas.
	  ○ Consideration of roundabouts in minor intersections within residential, school and park areas.
		The City acknowledges and appreciates this comment. Roadway improvements as part of the fee program would be required to be constructed consistent with the roadway design standards included in the circulation element of the Specific Plan. These design standards include multi-modal improvements such as bike and pedestrian improvements. These improvements will be constructed concurrent with development within the Specific Plan.

SA1-7	• Bicycles- we recommend the following measures to increase bicycle trips and safety: ○ We recommend amending the bikeway designation of 5 foot Class II Bike Lanes to Class IV Separated Bikeways,	The City acknowledges and appreciates this comment. The current project roadway designs are consistent with currently city roadway and mobility designs as well as the overall design criteria for the approved Renaissance Specific Plan.

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	per Caltrans Design Information Bulletin 89[iii], on several roadway segments within the Specific Plan area. Separated Bikeways have been found to reduce collisions for all road users and greatly increase bicycle trips due to their vertical and horizontal separation from automobiles. At a minimum, the California Highway Design Manual recommends Chapter 300 recommends 6 foot wide bike lanes when posted speeds are greater than 40 MPH. These can be paired with buffers (horizontal separation) and green paint in conflict areas. Class IV vertical separation could include flexible delineator posts, bollards, raised curbs, parked vehicles, and raised bike lanes. Class IV Separated Bike Lanes can also be two-directional. We recommend these amendments to Class IV Separated Bikeways standards on the following roadways: ▪ Renaissance Parkway (referring to Figure 3-2a)- this is recommended along the entire segment of Renaissance Parkway within the Specific Plan area, but would be effective if implemented at a minimum between Linden Avenue and Ayala Drive. This would provide a safe connection between the residential communities, the Town Center, and employment. ▪ Alder Avenue (referring to Figure 3-3)- this consideration would separate cyclists from truck traffic. ▪ Baseline Road (referring to Figure 3-4)- this would connect residents, park-goers, and employees with employment uses. ▪ Ayala Drive (referring to Figure 3-5)- this would connect residents and students to the school, park, Town Center, and employment. ▪ Casmalia Street (referring to Figure .3-6)- this would separate cyclists from primarily automobile-oriented Employment and Freeway Incubator uses. [iii] http://www.dot.ca.gov(hq /oppd/dib/dib89.pdf	

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SA1-8	○ Referring to Figure 3-2b Modified Renaissance Parkway at Ayala Intersection- we recommend consideration of upgrading the intersection to a protected intersection for cyclists and pedestrians. Design guidance for protected intersections is discussed in DIB 89.	The City acknowledges and appreciates this comment. The current project roadway designs are consistent with currently city roadway and mobility designs as well as the overall design criteria for the approved Renaissance Specific Plan.
SA1-9	○ Referring to Figure 3-7 Secondary Arterial (Miro Street and Locust Avenue), 8 foot wide Class II Bike Lanes are supported. In addition, we recommend the consideration of horizontal buffers between the bike lanes and automobile traffic and green paint in conflict areas.	The City acknowledges and appreciates this comment. The current project roadway designs are consistent with currently city roadway and mobility designs as well as the overall design criteria for the approved Renaissance Specific Plan.
SA1-10	○ Referring to Figure 3-8 Secondary Arterial (Linden Avenue), we recommend the meandering sidewalk on the East of the roadway be amended to Class I Multi-Use Path standards to provide off-road bicycle and pedestrian access. We recommend it be constructed in a direct path to provide an efficient transportation facility for cyclists and pedestrians.	The City acknowledges and appreciates this comment. The current project roadway designs are consistent with currently city roadway and mobility designs as well as the overall design criteria for the approved Renaissance Specific Plan.
SA1-11	○ Referring to Figure 3-9 Residential Collector (Typical), we recommend certain streets be designated as Bicycle Boulevards[iv] which may include shared lane markings, signage, safe and convenient major and minor street crossings, roundabouts, traffic calming, and green infrastructure. [iv] http: Unacto.org/publication /urban-bikeway-design-guide/bicycle-boulevards /	The City acknowledges and appreciates this comment. The current project roadway designs are consistent with currently city roadway and mobility designs as well as the overall design criteria for the approved Renaissance Specific Plan.
SA1-12	○ Referring to Figure 3-11 Local (Typical), we recommend prospective applicants utilize innovative design strategies outlined in the National Association of City Transportation Officials' Urban Street Design Guide. Refer to the guidelines provided for the "Neighborhood Street", "Yield Street", "Green Alley", and "Residential Shared Street" designations.	The City acknowledges and appreciates this comment. The current project roadway designs are consistent with currently city roadway and mobility designs as well as the overall design criteria for the approved Renaissance Specific Plan.
SA1-13	○ There is an apparent lack of east-west connections within the section of the Specific Plan area that is south of	The City acknowledges and appreciates this comment. The current project roadway designs are consistent with currently city roadway

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	SR-210, especially for cyclists and pedestrians. We therefore recommend construction of a Class I Multi-Use Path along the slope/buffer south of the Town Center and traveling west through the business center to connect to Class II Bike Lanes on Locust Avenue. Further, we recommend construction of another Class I Multi- Use Path south of the 42.2 acre Business Center and 36 acre Employment site that are planned South of Renaissance Parkway.	and mobility designs as well as the overall design criteria for the approved Renaissance Specific Plan.
SA1-14	○ We recommend the consideration of a citywide bikeshare system to provide affordable active transportation options for residents, employees, students, etc. to access jobs, school, housing, retail, parks. ○ Prospective employers should provide bicycle commute subsidies, including per-mile subsidies and bikeshare passes, to increase bicycle commuting among employees.	The City acknowledges and appreciates this comment. However, this comment is focused on changes to the City's General Plan and other City policies that are outside the scope of the proposed project to address. These comments will be provided included in the Final SEIR and provided to the City's decision making bodies for their review and consideration.
SA1-15	• Transit- we recommend the following measures to increase transit usage: ○ Prospective employers and the City should meet with Omnitrans to discuss providing transit passes or subsidies to employees. ○ The City should meet with Omnitrans to discuss bus route modifications, frequency and efficiency upgrades to service the new housing, retail and employment opportunities. With the Renaissance Specific Plan, bus routes are necessary along all major arterials, including Alder Avenue, Laurel Avenue, Locust Avenue, Linden Avenue, Ayala Drive, Casmalia Street, Renaissance Parkway, and Baseline Road. Currently, there are two bus routes servicing Rialto, including Routes 15, an east-west route traveling primarily along Rialto Avenue; and 22, a north-south route traveling primarily along Riverside Avenue. These routes could be modified to travel within the Specific Plan area; it is recommended that headways be reduced and bus signal	The City acknowledges and appreciates this comment. However, this comment is focused on changes to the City's General Plan and other City policies that are outside the scope of the proposed project to address. These comments will be provided included in the Final SEIR and provided to the City's decision making bodies for their review and consideration.

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	prioritization be planned to provide more high-quality transit options. We offer the following recommendations regarding transit planning: ▪ With High Density Residential providing 25 dwelling units per acre, this designation is supportive of high quality Bus Rapid Transit (BRT). We recommend consideration of a new BRT route along Ayala Drive to connect housing to employment, retail and schools and the proposed BRT line along Foothill Boulevard (referring to Omnitrans' System-Wide Transit Corridor Plan for the San Bernardino Valley). As the residential densities for medium high density residential and medium density residential along Linden Avenue are also supportive of BRT, Linden Avenue. can be chosen as an alternative to Ayala Drive. ▪ We recommend consideration of BRT along Baseline Road, to connect employment to the public transportation system that is recommended above. This could branch west from the proposed BRT line along Riverside Avenue (referring to Omnitrans' System-Wide Transit Corridor Plan for the San Bernardino Valley). Renaissance Parkway could be considered as an alternative to Baseline Road. ▪ The creation of a circulator trolley shuttle between employment, retail, housing and BRT stations within the Specific Plan area is recommended.	
SA1-16	• Travel Demand Management- we recommend the following strategies at employment sites to decrease VMT: ○ A reduction of single occupant parking, which will help reduce VMT and development costs. ○ The implementation of an Employee Commute Reduction Program per South Coast Air Quality Management District's Rule 2202[v] with preferential parking for carpools, vanpools, car-share and ride-share vehicles.	The City acknowledges and appreciates this comment. Please see Response SA1-3. Additionally, the proposed project is a Specific Plan level document and will be implemented as future developers submit application for development consistent with the approved Specific Plan land uses and overlay zones. Future developers and tenants of the Freeway Commercial and Freeway Incubator uses will be encouraged to use measures to reduce vehicles trips. Measures such as ride-sharing, van pools, shuttles, preferred parking for electric vehicles, and employer paid transit passes are viable options

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	○ Telecommuting and flexible work schedules. ○ Solar powered shade structures with electric vehicle charging stations. [v] http://www.aqmd.gov /docs/default-source/rule-book/support-documents /rule-2202/rule-2202-employee-commutp-reduction-progr.am-guidelines-(ecrp).pdf?sfvrsn=2	to reduce traffic trips. These measures can be enforced through such mechanisms as owner agreements or tenant associations.
SA1-17	Traffic Operations and Forecasting Caltrans' Planning and Operations Divisions review Traffic Impact Analyses to assess analysis, methodology and projected impacts to the State Highway System, and provide recommended mitigation strategies. We have the following comments regarding the Traffic Impact Analysis:	Comment noted. Responses have been provided below.
SA1-18	• Referring to section 1.2 Analysis Methodology: show the Analysis Methodology for the project and clearly identify within the entire TIA for Existing, Opening, and Future years.	Section 1.2 “Analysis Methodology” describes the methodology for calculating levels of service as well at the impact criteria used in the analysis. The analysis methodologies used for each component of the TIA (RSPA, Renaissance Market Place, and PA 108) are described in detail under Section 3.0 “Renaissance Specific Plan Amendment Analysis,” Section 4.0 “Renaissance Marketplace Analysis, and Section 5.0 “PA 108 Analysis” respectively. Furthermore, detailed analysis worksheets are contained in the appendix of the report. Existing conditions are based on year 2015 conditions. The opening year of both the Renaissance Market Place and Planning Area 108 is 2016. The horizon year for the RSPA, Renaissance Market Place, and Planning Area 108 analyses is 2035. The horizon year analysis is included in Section 3.0, "Renaissance Specific Plan Amendment Analysis," of the RSPA TIA.
SA1-19	• Referring to Section 1.3 Traffic Model: show if traffic data for the project area of the San Bernardino Traffic Analysis Model (SBTAM) are consistent with the current model prepared for SANBAG.	The updated SBTAM has not been officially released for traffic analysis purposes. Therefore, the model currently being prepared by SANBAG has not been used for the TIA. However, SANBAG has allowed consultants to review the updated model for comparative purposes. Attached Table A illustrates a comparison between the 2012 SBTAM and updated SBTAM model volumes. As shown on attached Table A,

Comment Number	Comment	Response
		the 2012 SBTAM (used for the RSPA TIA) shows a 1.3% per annum growth while the updated SBTAM shows 0.91% per annum growth within the project area. Thus, the analysis is consistent and more conservative.
SA1-20	• Referring to Figure 1-3 Conceptual Site Plan for Renaissance Marketplace: project access between SR-210 interchange ramp and Renaissance Parkway is still shown. Please verify.	Figure 1-3 does not show an access location to the Renaissance Marketplace between SR-210 interchange ramp and Renaissance Parkway. There will be no driveway between the ramps and Renaissance Parkway.
SA1-21	• Referring to Section 2.1.1 Trip Generation (RSPA): discuss whether an Ambient Growth Factor was used in this TIA.	Ambient growth is never applied to a project trip generation and was not applied to the RSPA trip generation. The trip generation for the RSPA was approved by City staff and is based on rates from the Institute of Transportation Engineers (ITE) *Trip Generation*, 9th Edition. Ultimately, ambient growth was considered for all study area roadways and intersections as discussed in the response to comment SA1-28.
SA1-22	• Referring to Section 2.1.3 Trip Generation Comparison (RSP & RSPA): incorporate a plot and exhibit showing truck restriction routes within and in close proximity to the proposed project site.	Figure 3-13 of the updated Renaissance Specific Plan Amendment illustrates truck routes within the Specific Plan area.
SA1-23	• Referring to Section 3.1 RSPA Analysis Methodology: provide the Ambient Growth Factor and the Project Opening Year.	Ambient growth was considered for all study area roadways and intersections. For future (year 2035) analysis scenarios, background volumes for the RSPA analysis were determine using the 2012 SBTAM and SANBAG procedures for post-processing of modeled traffic volumes. The 2012 SBTAM generally shows a 1.3% per annum growth. For the project opening year a 2.0% per annum growth rate was applied.
SA1-24	• Referring to Section 3.1.1 Volume Development: the TIA states that traffic counts were collected in 2014 to develop existing (2015) traffic volumes, Appendix A is mentioned as the source for more information; however, the count sheets are dated 9/24/2013. Please verify the correct date on which counts were taken.	In addition to 2014 and 2015 counts, 2013 counts were used at six locations at the discretion of City staff. At these locations, counts collected in 2013 were greater than 2014. As indicated in the RSPA TIA, all counts were adjusted using a conservative 2 percent growth rate.

Comment Number	Comment	Response
SA1-25	• Referring to Section 3.1.1 Volume Development Item 6: include an exhibit showing the numerical values of the existing truck percentages.	Existing truck percentages are summarized in Appendix B of the report. Attached Table B shows the numerical values of the existing truck percentages.
SA1-26	• Referring to Figure 3-1 Existing Intersection Geometries and Stop Control: correct lane assignments on all the intersections listed below: o Intersection #9: Laurel Avenue Northbound lane. o Intersection #11: Locust Avenue Northbound lane. o Intersection #13: Baseline Road Eastbound right turn lane. o Intersection #15: Linda Avenue Northbound and Southbound.	Existing geometrics used for analysis are based on the conditions observed at the time the environmental Notice of Preparation was filed in October 2014. Since this time, roadway improvements (including striping) may have been constructed on Laurel Avenue, Locust Avenue, Baseline Road and Linden Avenue.
SA1-27	• Referring to Table 3-L -RSPA: Year 2035 with RSPA with Recommended Improvements; and Table 3-M -RSPA: Year 2035 with RSPA with Modified Improvements for Queuing Issues: prepare the detail queue and available storage length analyses for all turning movements (Left turn, Right turn, Through) and extend to the proper storage length per the California Highway Design Manual at the following locations: o SR-210 and the Alder Avenue Ramps o SR-210 and the Ayala Drive Ramps	Please see attached Table C for an evaluation of queues at these locations.
SA1-28	• Referring to Section 4.9 Queuing Analysis: conduct Ramp Queuing, Merge/Diverge and Segments Analysis for all state facilities and then state if proposed projects will impact SR- 210 mainline and associated ramps.	As stated in the TIA, the proposed amendment would result in the RSPA generating trips generally lower than those forecasted in the July 2010 RSP analysis. Because the number of trips generated is generally lower, it is unlikely that the project would create new circulation impacts outside the project study area. Therefore, the proposed changes to the original specific plan do not alter the regional impacts discussed in the 2010 TIA. All project impacts outside the RSPA study area have been disclosed in the July 2010 RSP analysis and associated amendment analyses. The July 2010 RSP analysis shows that the SR-210 freeway segments adjacent to Alder Avenue and Ayla Drive Ramps are forecast to operate an unsatisfactory LOS under year 2035 conditions; and therefore so would the adjacent merge/diverge areas. Queuing has

Comment Number	Comment	Response
		been disclosed in the RSPA analysis because previous analysis did not report queues. This is consistent with the disclosure under the 2010 EIR, and does not result in a new finding of impact.
SA1-29	All comments should be addressed with a Response to Comments included, and the TIA should be resubmitted prior to proceeding with the Encroachment Permit Process. These recommendations are preliminary and summarize our review of materials provided for our evaluation. Please continue to keep us informed of the project and other future updates, which could potentially increase VMT or decrease safety for road users. If you have any questions or need to contact us, please do not hesitate to contact Dustin Foster at (909) 806-3955 or myself at (909) 383-4557.	Comment noted.
Local Agencies		
San Bernardino County Department of Public Works: November 7, 2016		
LA1-1	Prior to outlet of drainage into the San Bernardino County Flood Control District's (District) Cactus Basin, a hydrology study shall be reviewed and approved by the District.	Comment noted. Applicant will submit a hydrology study to be reviewed and approved by the District.
Rialto Unified School District: October 16, 2016		
LA2-1	<u>New Residential Housing</u> Per the Revised Renaissance Specific Plan the 1,279 new residential l units within (7) residential planning areas all lie within RUSD boundary. The current breakdown is listed as (404)-LDR, (363) MDR, (312)-MHDR, and (200)-HDR. Applying the current Student Generation Factor (SGF) Rialto Unified would yield 445 elementary students, 223 middle school students, and 269 high school students for a total of 936 K-12 students entering the RUSD school system. Please see exhibit "Table 3-2".	The City acknowledges and appreciates this comment. When future development occurs within the specific plan, school fees will be collected at the time building permits are issued. School fees will be determined by the school districts current fee schedule for the specific type of development being constructed. The payment of school fee as mitigation is consistent with Section 65995(3)(h) of the California Government Code and is considered adequate mitigation for indirect impacts on school facilities and potential impacts are considered less than significant. Additionally, the Specific Plan includes property for a future school site that will be under the control of the School District.

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LA2-2	Commercial Industrial The school boundary between Fontana and Rialto school districts bisects through the center of the industrial I commercial planning areas. It is estimated that 8,176,725 square feet of commercial I industrial space lie within RUSD. The remaining square footage lies within Fontana Unified School District. Please see exhibit "RUSD Commercial Area".	See response to comment LA2-1, above.
LA2-3	'Table 3-2' from the Renaissance DS EIR indicates a creation of approximately 7,000 jobs from business type uses in the Land Use Plan. 'Table-9 ' from the most current Developer Fee Justification and Impact Analysis, dated March 2016, applies K-8 student generation factors from 0.15 to .039 per employee from the Commercial Industrial Development. Applying these factors generates roughly over 900 grades K-8 students from these Commercial/Industrial planning areas in the RUSD boundary. This would be in addition to the 668 K-8 students to be generated from the proposed residential planning areas. Total K-8 students to be generated in RUSD from this project would be estimated at over 1,500 students. These calculations would have to be applied to properly address the potential school district growth in the Revised Renaissance Specific Plan.	See response to comment LA2-1, above.
LA2-4	Recirculation Please note 'Table 3-2' and 'Table 3-3' of the Recirculation DS EIR confirms these statistics and calculations as 2016 Revisions.	The City acknowledges and appreciates this comment.
Organizations		
Lozeau Drury LLP on behalf of Laborers International Union North America, Local Union 783: November 10, 2016		
OR1A-1	I am writing on behalf of Laborers International Union of North America, Local Union No. 783 and its members living in the City of Rialto and San Bernardino County (collectively “LIUNA” or	Please see responses to OR1-1 through OR1-51 below.

Comment Number	Comment	Response
	"Commenters") regarding the Recirculated Draft Subsequent Environmental Impact Report ("RDSEIR") prepared for the Renaissance Specific Plan ("Project" or "RSP") (SCH No. 2006071021). On August 19, 2016, we submitted extensive comments on the Draft Subsequent Environmental Impact Report ("DSEIR") issued in June 2016. After reviewing the RDSEIR, it is evident that the document contains numerous errors and omissions that preclude accurate analysis of the Project. As a result of these inadequacies, the RDSEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. Commenters request that the City of Rialto ("City") address these shortcomings in a new draft environmental impact report and recirculate the DEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. Galante Vineyards v. Monterey Peninsula Water Management Dist., 60 Cal. App. 4th 1109, 1121 (1997). Thank you for your consideration of these comments.	
Lozeau Drury LLP on behalf of Laborers International Union North America, Local Union 783: August 19, 2016		
OR1-1	After reviewing the DSEIR, together with our team of expert consultants, it is evident that the document contains numerous errors and omissions that preclude accurate analysis of the Project. As a result of these inadequacies, the DSEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. Commenters request that the City of Rialto ("City") address these shortcomings in a revised draft environmental impact report and recirculate the RDEIR prior to considering approvals for the Project.	The City of Rialto disagrees with the comment regarding the Draft SEIR containing numerous errors and omissions. , however, it prepared a Recirculated DEIR, which was made available for public review and comment from September 26, 2016 to November 10, 2016.
OR1-2A	Commenters have submitted expert comments from air quality experts Soil Water Air Protection Enterprise ("SWAPE"), who concludes that the DEIR fails to adequately evaluate the Project's air quality impacts. First, the DSEIR makes inaccurate truck trip assumptions that are inconsistent with traffic guidelines set forth by	The truck assumptions are consistent with the guidelines set forth by the SCAQMD. Truck assumptions used in the analysis are consistent with the DSEIR's Traffic Impact Analysis. As such, truck trips were determined based on the City's Traffic Impact Analysis Report Guidelines and Requirements, dated December 2013 which requires

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	the South Coast Air Quality Management District ("SCAQMD"). As a result, the DSEIR significantly underestimate emissions from truck traffic generated by the Project.	the implementation of the SCAQMD recommendations to use a minimum truck rate of 40% of total project traffic.
OR1-2B	Second, the DSEIR fails to take into consideration the changed circumstance of State Route 210, which was not fully functional at the time of the 2006 EIR. This changed circumstance to the environmental setting of the Project significantly impacts the traffic impacts of the Project.	This statement is incorrect. As stated and explained in the TIA, the proposed amendment would result in the RSPA generating trips generally lower than those forecasted in the July 2010 RSP analysis. Because the number of trips generated is generally lower, it is unlikely that the project would create new circulation impacts outside the project study area (beyond what was disclosed as part of the Renaissance Specific Plan TIA dated July 2010). In addition, the SR-210 freeway opened during the time the previous traffic analysis was prepared. As such, traffic volumes used in the July 2010 analysis were adjusted to account for the change in the circulation system referenced in the comments. Therefore, all circulation impacts outside the RSPA study area have been disclosed in the July 2010 RSP analysis and associated amendment analyses. This is consistent with the disclosure under the 2010 EIR, and does not result in a new finding of impact.
OR1-2C	Third, the DSEIR's air quality analysis improperly assumes only unrefrigerated land use, resulting in an underestimate of operational air emissions.	The AQ analysis has been updated in response to the SWAPE comments, it now incorporates the assumption that 15 percent of the warehouses would be refrigerated.
OR1-2D	Fourth, the RDEIR fails to incorporate all feasible mitigation measures to reduce the Project's significant operational NOx emissions. SWAPE's comments are attached hereto as Exhibit 1 and are incorporated in their entirety.	All feasible mitigation measures to reduce NOx emissions have also been added, as detailed in the response to comment OR1-20. This was all included in the updated AQ Report and in the Recirculated DEIR, which was made available for public review and comment from September 26, 2016 to November 10, 2016.
OR1-3	Commenters also submit comments from expert transportation analyst Daniel Smith, Jr., P.E., a registered civil and traffic engineer. Mr. Smith points out numerous flaws and inconsistencies in the Traffic Impact Analysis that must be addressed in a revised DEIR. Mr. Smith's comments and curriculum vitae are attached hereto as Exhibit 2 and are incorporated by reference in their entirety.	This comment is introductory. Comment noted. Detailed responses are provided in subsequent sections.

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	Each of SWAPE's and Mr. Smith's comments require separate responses from the City. These experts and our own independent review demonstrate that the DSEIR is inadequate and that a revised DSEIR should be prepared prior to Project approval to analyze all impacts and require implementation of all feasible mitigation measures.	
OR1-4	In 2010, the City of Rialto ("City") certified an environmental impact report ("EIR") for the Renaissance Specific Plan ("RSP"). That EIR ("2010 RSP EIR") analyzed the RSP, which proposed a total of approximately 16.2 million square feet of business and commercial uses (835,200 square feet of which is existing and expected to remain), 1,667 residential units, one (1) school, one (1) community parks, and multiple neighborhood parks. The RSP project is partially located on the site of the Rialto Municipal Airport in the west central portion of the City of Rialto. The project site is generally bordered on the north by Casmalia Street, on the south by Baseline Road, on the east by Ayala Drive, and on the west by Tamarind Avenue. State Route 210 (SR-210) traverses the northern portion of the project site. The RSP Draft EIR was released for public review on May 3, 2010; the RSP Final EIR was certified on November 9, 2010. Since certification of the 2010 RSP Final EIR, six addenda to the Final EIR have been prepared and undergone respective CEQA review and approval. They are: Golden Bear Regional Food Distribution Center Project Addendum (2012), SR-210 Logistics Center II Project Addendum (2013), Rialto 42 Distribution Center Project Addendum (2013), Medline Project Addendum (2015), Niagara Project Addendum (2015), and SR-210 Logistics Center III Project Addendum (2015). (2016 RSPA SEIR p. 3- 7).	Comment noted.
OR1-5	On July 5, 2016, the City issued the Renaissance Specific Plan Amendment Draft Subsequent Environmental Impact Report (June 2016) SCH# 2006071021 ("DSEIR"). The proposed RSP Amendment would allow for the relocation of business and industrial uses to the	Comment noted.

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	west of Linden Avenue, the relocation of all residential land uses and the public park to the east of the Linden Avenue, and implementation of the Renaissance Marketplace retail development and the Planning Area 108 industrial/warehouse development ("PA 108"). In addition to the Specific Plan Amendment, the project includes the Renaissance Marketplace consisting of an approximately 505,500 square foot retail center. The Renaissance SEIR states that "These developments were not specifically identified in the 2010 RSP," and an SEIR is therefore required. (DSEIR, p. 1-2). The 2016 RSPA DSEIR includes Planning Area 108, an industrial/warehouse development comprised of approximately 4 million square feet of industrial/warehouse uses. In the 2010 RSP, this area was designated "Light Industrial," but was not modeled as warehouse space. The Planning Area 108 component of the proposed Project would be developed with up to approximately 4 million square feet of industrial/warehouse uses. The development would include three buildings, each between 1.2 and 1.4 million square feet. Planning Area 108 is located on the north side of Miro Way between Locust and Linden Avenues. Access to the proposed industrial/warehouse uses would be provided by four driveways on Locust Avenue, three driveways on Linden Avenue, and one driveway on Miro Way.	
OR1-6	CEQA requires that an agency analyze the potential environmental impacts of its proposed actions in an environmental impact report ("EIR") (except in certain limited circumstances). *See*, *e.g.*, Pub. Res. Code § 21100. The EIR is the very heart of CEQA. *Dunn-Edwards v. BAAQMD* (1992) 9 Cal.App.4th 644, 652. "The 'foremost principle' in interpreting CEQA is that the Legislature intended the act to be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." *Comms. for a Better Env't v. Calif. Resources Agency* (2002) 103 Cal. App. 4th 98, 109.	The City of Rialto acknowledges the relationship between an EIR and CEQA.

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	CEQA has two primary purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. 14 Cal. Code Regs. ("CEQA Guidelines") § 15002(a)(1). "Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR 'protects not only the environment but also informed self-government.'" *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564. The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs*. (2001) 91 Cal. App. 4th 1344, 1354 ("*Berkeley Jets*"); *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810. Second, CEQA requires public agencies to avoid or reduce environmental damage when "feasible" by requiring "environmentally superior" alternatives and all feasible mitigation measures. CEQA Guidelines § 15002(a)(2) and (3); *see also Berkeley Jets*, 91 Cal. App. 4th 1344, 1354; *Citizens of Goleta Valley v. Bd. of Sups.* (1990) 52 Cal.3d 553, 564. The EIR serves to provide agencies and the public with information about the environmental impacts of a proposed project and to "identify ways that environmental damage can be avoided or significantly reduced." CEQA Guidelines §15002(a)(2). If the project will have a significant effect on the environment, the agency may approve the project only if it finds that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns." Pub.Res.Code ("PRC") § 21081; CEQA Guidelines § 15092(b)(2)(A) & (B). The EIR is the very heart of CEQA. *Dunn-Edwards v. BAAQMD* (1992) 9 Cal.App.4th 644, 652. CEQA requires that a lead agency analyze all potentially significant environmental impacts of its proposed actions in an EIR. PRC § 21100(b)(1); CEQA Guidelines § 15126(a); *Berkeley Jets*, 91 Cal.App.4th 1344, 1354. The EIR must	

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	not only identify the impacts, but must also provide "information about how adverse the impacts will be." *Santiago County Water Dist. v. County of Orange* (1981) 118 Cal.App.3d 818, 831. The lead agency may deem a particular impact to be insignificant only if it produces rigorous analysis and concrete substantial evidence justifying the finding. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692. "The 'foremost principle' in interpreting CEQA is that the Legislature intended the act to be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." *Cmtys. for a Better Env't v. Cal. Resources Agency* (2002) 103 Cal.App.4th 98, 109. While the courts review an EIR using an "abuse of discretion" standard, "the reviewing court is not to 'uncritically rely on every study or analysis presented by a project proponent in support of its position. A 'clearly inadequate or unsupported study is entitled to no judicial deference.'" *Berkeley Jets*, 91 Cal. App. 4th 1344, 1355 (emphasis added), quoting, *Laurel Heights Improvement Assn. v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376, 391 409, fn. 12. A prejudicial abuse of discretion occurs "if the failure to include relevant information precludes informed decision making and informed public participation, thereby thwarting the statutory goals of the EIR process." *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal. App. 4th 713, 722]; *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal. App. 4th 1109, 1117*; County of Amador v. El Dorado County Water Agency* (1999) 76 Cal. App. 4th 931, 946.	
OR1-7	As discussed below, and in the attached expert comment letters of expert Matthew Hagemann, P.G., C. Hg., expert biologist Dr. Shawn Smallwood, and expert traffic engineer Mr. Daniel Smith, Jr., P.E., the RDEIR for this Project fails to adequately analyze and mitigate the Project's impacts.	Refer to Response to OR1-29 and OR1-51.
OR1-8	The attached comments from SWAPE point out that the SDEIR and appendices fail to include the air model output files, which are	The complete CalEEMod output for all of the modeling conducted was included in the Recirculated DEIR, which was made available for

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	necessary to determine the accuracy of the modeling performed. According to the DSEIR, CalEEMod was used to estimate the construction and operational criteria air pollutant emissions from the Renaissance Marketplace and Planning 108 areas, and was used to estimate the operational emissions from the previously approved RSP and the RSPA (DSEIR, p. 4.2-17). CalEEMod provides recommended default values based on site specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. SWAPE determined that the CalEEMod output files for the Renaissance Marketplace and Planning 108 areas were completely omitted. Rather, the Air Quality and Greenhouse Gas Analysis (Appendix C) only provides the output files for the RSP's and the RSPA's operational emissions (Appendix C, pp. 84). Without the Renaissance Marketplace and Planning 108 output files, SWAPE was unable to verify that the assumptions used within these models are correct and cannot determine what default values were used. While Appendix C of the DSEIR discusses what assumptions were used in the models for calculating the Renaissance Marketplace's and Planning 108's construction and operational emissions, SWAPE was unable to verify that these assumptions were correctly inputted into the model (Appendix C, p. 34, 51).	public review and comment from September 26, 2016 to November 10, 2016.
OR1-9	As the California Supreme Court stated in *Laurel Heights Improvement Assn. v. Regents of University of California* (2988) 47 Cal. 3d 376, 405: "The Regents miss the critical point that the public must be equally informed…. If the Regents considered various alternatives and found them to be infeasible, we assume, absent evidence to the contrary, that they had good reasons for doing so. Those alternatives and the reasons they were rejected, however, must be discussed in the EIR in sufficient detail to enable meaningful participation and criticism by the public." Similarly, the court stated in *Santiago County Water District v. County of Orange*	The City of Rialto acknowledges the noticing requirements under CEQA none of which were violated because Appendix C was attached to the DEIR, which was made available for public review and comment from September 26, 2016 to November 10, 2016.

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	(1981) 118 Cal.App.3rd 818, 831: > "The county has attempted to remedy the inadequacies of the EIR by presenting evidence to the trial court to show that there are sufficient water resources available for the project. Indeed, the trial court made findings of fact to such effect. This, however, is beside the point. It is the adequacy of the EIR with which we are concerned, not the propriety of the board of supervisors' decision to approve the project. '[W]hatever is required to be considered in an EIR must be in that formal report; what any official might have known from other writings or oral presentations cannot supply what is lacking in the report.'" Also, the EIR and all supporting documentation must be available for public review during the entire CEQA comment period. CEQA section 21092(b)(1) requires that the CEQA notice for an EIR must include "the address where copies of the proposed EIR and all documents referenced therein are available for review and readily accessible during the agency's normal working hours." (Emphasis added) As noted by a leading CEQA treatise: > The above-referenced section [21092(b)(1)] requires the agency to notify the public of the address at which "all documents referenced in a draft EIR" can be found (and presumably read) . . . seems to require agencies to make available for public review all documents on which agency staff or consultants expressly rely in preparing a draft EIR. In light of case law emphasizing the importance of ensuring that the public can obtain and review documents on which agencies rely for the environmental conclusions (see, e.g., *Emmington v. Solano County Redevel. Agency*, 195 Cal.App.3d 491, 502-503 (1987)), agencies should ensure that they comply literally with this requirement. Remy, Thomas, Moose & Manley, Guide to the California Environmental Quality Act, p. 300 (Solano Press, 11th Ed. 2007). The courts have held that the failure to provide even a few pages of a CEQA documents for a portion of the CEQA review period	

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	invalidates the entire CEQA process. *Ultramar v. South Coast Air Quality Man. Dist*., 17 Cal.App.4th 689 (1993). CEQA requires that information or data cited by an EIR "as the source of conclusions stated therein . . . shall be reasonably available for inspection at a public place or building." Pub. Resources Code § 21061. Thus, while an EIR may properly rely on third-party studies, it may do so only if it either appends the study in question or notifies the public of its location at the time it makes the EIR available for public review. *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1987) 193 Cal.App.3d 1544, 1549; *San Francisco Ecology Center v. City and County of San Francisco* (1975) 48 Cal.App.3d 584, 595; Pub. Resources Code § 21092(b) (1) (notice of preparation shall specify address where copies of all referenced documents are available for review); see also CEQA Guidelines § 15087(c)(5).	
OR1-10	Since the EIR omits critical information necessary for accurate review of the document, the EIR is inadequate as a public information document. The City must make the CalEEMod date available and reopen the DSEIR public review period once the information is made available to the public.	CalEEMod data is included in the Recirculated DEIR, which was made available for public review and comment from September 26, 2016 to November 10, 2016.
OR1-11	SWAPE has determined that the DSEIR uses improper air model input files that fail to account for emissions from truck traffic related to the warehouses that are proposed for PA 108. Despite that the fact that PS 108 will include 4 million square feet of warehouses (which involve high levels of heavy truck traffic), the DSEIR modeled emissions using CalEEMod inputs for Light Industrial uses, which have much lower traffic emission. (SWAPE p. 4, citing DSEIR Appendix C, pp. 123). SWAPE concludes that this error significantly underestimates emissions from the Project. The South Coast Air Quality Management District ("SCAQMD") requires use of the proper input variable in the CalEEMod model. Large warehouses are defined by the SCAQMD as warehouse projects and distribution centers greater than 100,000 square feet. See CalEEMod User Guide, Appendix E: Technical Source	The AQ analysis has been updated in response to the SWAPE comments, including modeling all warehouse land use areas as warehouses. The updated modeling follows all SCAQMD recommendations for a warehouse analysis combined with the detailed traffic analysis conducted for this project. This was all included in the Recirculated DEIR, which was made available for public review and comment from September 26, 2016 to November 10, 2016.

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	Documentation, SCAQMD, available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/high-cube-resource-caleemod- appendix-e.pdf?sfvrsn=2, p. 12. The court of appeal has held that the SCAQMD CEQA thresholds apply in the City of Rialto. *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal. App. 4th 899, 933 (SCAQMD CEQA thresholds apply to City of Rialto). The DSEIR fails as an informational document because it fails to account properly for emissions from truck traffic related to the 4 million square feet of warehouse proposed for the Project, and fails to comply with SCAQMD methodology to calculate emissions.	
OR1-12	The DSEIR indicates that many tenants will be engaged in cold (refrigerated) storage, trucking and warehousing. Yet the DSEIR assumes that there will be no cold storage in the Project. Cold storage results in much higher ongoing air pollutant emissions due to the energy required to power refrigeration units on trucks and at the warehouse. The DSEIR's omission of cold storage therefore significantly understates air pollutant and greenhouse gas emissions from the Project. The 2010 EIR assumed that approximately 11 percent of the total warehouse floor space for the previously approved RSP (approximately 1,023,112 SF) would be used for cold storage (2010 EIR, p. 4.17-35). The 2010 EIR included Mitigation Measure AQ-12 of the 2010 Approved DEIR and FEIR states, "A minimum of ten percent of the loading docks for the warehouse/distribution center uses shall contain outdoor electrical hook-up sources for service equipment and trucks such as transportation refrigeration units. In addition, electrical hookups shall be provided at the loading docks located at refrigerated warehouses for transportation refrigeration units visiting these locations. All trucks with transportation refrigeration units are required to connect to the electrical hookups while loading or unloading deliveries to the proposed project. Trucks with transportation refrigeration units are prohibited from	The AQ analysis has been updated in response to the SWAPE comments, including the assumption that 15 percent of the warehouses would be refrigerated. This was all included in the Recirculated DEIR, which was made available for public review and comment from September 26, 2016 to November 10, 2016.

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	accessing refrigerated warehouses unless they have the capability to connect to the electrical hookups" (2010 DEIR, Table 1-1, p. 1-10; FEIR, Table 1-1, p. 3-24). Thus, it is clear that the Project will include cold storage. Yet, the DSEIR assumes that there will be no cold storage as part of the Project, thereby vastly underestimating the Project's air quality and greenhouse gas emissions. Therefore, the RDEIR must include an analysis of the environmental effects of the Project having tenants that require refrigeration. *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376, 396. Failing to account for the Project's potential partial use as refrigerated warehouse is a significant omission. Refrigerated trucks tend to idle much longer than typical hauling trucks, even up to an hour. Energy usage from warehouses equipped with industrial size refrigerators and freezers is also much greater when compared to unrefrigerated warehouses. In addition, according to the July 2014 SCAQMD *Warehouse Truck Trip Study Data Results and Usage* presentation, trucks that require refrigeration resulted in greater truck trip rates when compared to non-refrigerated trucks.[1] SWAPE, p.6. By not including any refrigerated warehouse land uses in the Air Quality Analysis, the emissions from this potential land use are grossly underestimated. An updated RDEIR must be prepared to account for the possibility of refrigerated warehouse needs by tenants. [1] http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate- study-for-air-quality-analysis/finaltrucktripstudymsc072514.pdf?sfvrsn=2	
OR1-13	SWAPE concludes that the DSEIR uses an improper and inappropriate truck trip rate calculation. (SWAPE, p. 7-8) The DSEIR fails to comply with SCAQMD Guidance concerning truck trip estimation for warehouse projects. As a result, the DSEIR underestimates truck traffic by 24,816 trips, or approximately 9 million trips per year. By using the incorrect trip rates, the DSEIR inaccurately estimates the number of passenger car and truck trips	The AQ analysis has been updated to follow all SCAQMD recommendations for warehouse analysis combined with data from the DSEIR's Traffic Impact Analysis. As such, the trip generation for all warehouse land uses was developed using ITE Trip Generation, 9th Edition rates for Land Use 150 – "Warehousing." All project trips for these uses were converted to passenger car and truck trips using vehicle mix from the City's "Traffic Impact Analysis Report Guideline

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	the RSPA's warehouse land uses will generate during operation. (SWAPE p. 8). SCAQMD requires the use of the Institute of Transportation Engineers Trip Generation Manual, 9th Edition, 2012 (ITE Manual) in conjunction with their truck mix by axle-type to better quantify trip rates associated with local warehouse and distribution projects.	and Requirements," dated December 2013 which requires the implementation of the SCAQMD recommendations to use a minimum truck split of 40% of total project traffic. This was all included in the Recirculated DEIR, which was made available for public review and comment from September 26, 2016 to November 10, 2016.
OR1-14	According to the ITE Manual, an overall vehicle trip rate of 3.56 trips per thousand square feet (trips/TSF) should be used for Warehouse land uses (Land Use Code 150), which is consistent with the trip rate used in the DSEIR's Traffic Impact Analysis (Table 2-A, pp. 41)[2]. Furthermore, according to the DSEIR's Traffic Impact Analysis, a passenger car trip rate of 2.136 trips/TSF should also be used for the proposed warehouse land uses (Table 2-A, pp. 41). When these trip rates are utilized, SWAPE found that the RSPA's warehouse land uses would generate approximately 31,410 passenger car trips and approximately 20,881 truck trips for a total of 52,291 trips per day (see table below) [see table in Comment Letter OR1]. Therefore, using the recommendations set forth by the SCAQMD and values provided in the DSEIR's Traffic Impact Analysis, the DSEIR should have used the same daily vehicle and truck trip rates as described in the table above. When SWAPE reviewed Appendix C of the DSEIR, however, SWAPE found that the CalEEMod model relied upon an overall trip rate of 3.191 trips/TSF to estimate the number of daily vehicle and truck trips the warehouse land uses would generate during operation, which is not only inconsistent with the DSEIR's Traffic Impact Analysis, but is also inconsistent with the trip rate set forth by the Institute of Transportation Engineers for Warehouse land uses (ITE 150 Warehouse) (DSEIR, Appendix C, pp. 124). When this incorrect trip rate is used, the proposed warehouse land uses would generate approximately 22,139 passenger car trips (LDA) and approximately 5,336 truck trips (LHD1, MHD, HHD), for a combined total of 27,475 trips per day (see table below) [see table in Comment Letter OR1].	All of commenters points were addressed in the AQ analysis which was been updated in response to the SWAPE comments, including using the recommendations set forth by the SCAQMD for warehouse analysis combined with data from the DSEIR's Traffic Impact Analysis, as described in the response to comment OR1-13. This was all included in the Recirculated DEIR, which was made available for public review and comment from September 26, 2016 to November 10, 2016.

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	The DSEIR's CalEEMod model underestimates the warehouses' number of daily trips made by passenger cars and trucks by 24,816 trips, or approximately 9 million trips per year. By using the incorrect trip rates, the DSEIR inaccurately estimates the number of passenger car and truck trips the RSPA's warehouse land uses will generate during operation. [2] Institute of Transportation Engineers Trip Generation Manual, 9th Edition, 2012, p.267	
OR1-15	SWAPE points out that the DSEIR fails to use the truck fleet mix set forth by the SQAMD, and that this results in a significant underestimation of Project emissions. The SCAQMD recommends that lead agencies assume a truck fleet mix of 40%. According to *Appendix E: Technical Source Documentation* of the CalEEMod User's Guide, "in order to avoid underestimating the number of trucks visiting warehouse facilities," SCAQMD staff "recommends that lead agencies conservatively assume that an average of 40% of total trips are truck trips."[3] This 40% truck fleet percentage is also used in the DSEIR's Traffic Impact Analysis to estimate the number of truck trips the RSPA's proposed warehouse land uses would generate (Table 2-A, pp. 41). Review of the DSEIR's CalEEMod output files, however, demonstrates that a truck fleet (LHDT1, MHD, and HHDT) percentage of approximately 11% was used, rather than the 40% value recommended by the SCAQMD (DSEIR, Appendix C, pp. 129). As a result, the RSPA's warehouse truck emissions are greatly underestimated. (SWAPE p. 8-9). SWAPE points out that the DSEIR also fails to use the SCAQMD fleet mix with respect to the number of axels per truck. This results in a further underestimation of Project air quality and greenhouse gas emissions. A revised DSEIR is required to correct these errors. [3] Appendix E Technical Source Documentation." CalEEMod User's Guide, July 2013, available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate- study-for-air-quality-analysis/high-cube-resource-caleemod-appendix-e.pdf?sfvrsn=2, pp. 15	The AQ analysis has been updated in response to the SWAPE comments, including using the truck fleet mix recommendations set forth by the SCAQMD. This was all included in the Recirculated DEIR, which was made available for public review and comment from September 26, 2016 to November 10, 2016.

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OR1-16	SWAPE concludes that the DSEIR uses an improper truck trip length, disregarding guidance from the SCAQMD. This further underestimates air quality and greenhouse gas emissions from the Project. The DSEIR assumes and average truck trip length of 16.6 miles, which is the number for light industrial projects. However, for warehouse projects, such as this one, SCAQMD recommends a much longer truck trip length of 40 miles. Since the Project will involve 4 millions square feet of warehouse uses, the DSEIR should use the SCAQMD 40 mile truck trip length.	The AQ analysis has been updated in response to the SWAPE comments, including using the truck trip length recommendations set forth by the SCAQMD. This was all included in the Recirculated DEIR, which was made available for public review and comment from September 26, 2016 to November 10, 2016.
OR1-17	SWAPE corrected all of the above-mentioned errors and miscalculations. The result was that the corrected air pollutant emissions from the Project are approximately double the emissions set forth in the DSEIR. When correct input parameters are used to model emissions from the proposed warehouse land uses, we find that the RSPA's peak operational criteria air pollutant emissions not only exceed SCAQMD regional thresholds, but these emissions also increase significantly when compared to the DSEIR's RSPA model (see table below) [see table in Comment Letter OR1]. As one can see in the tables above, ROG emissions increase by approximately 25%, NOx emissions increase by approximately 490%, SOx emissions increase by approximately 65%, PM_{10} emissions increase by approximately 99%, and $PM_{2.5}$ emissions increase by approximately 124% for both summer and winter seasons. These updated emission estimates demonstrate that when the RSPA's warehouse emissions are estimated correctly, the Project would result in substantially more severe significant effects than what was previously examined in both the 2010 EIR, as well as the 2016 DSEIR (DSEIR, p. 2-3).	The Recirculated DEIR, which was made available for public review and comment from September 26, 2016 to November 10, 2016, contains the updated analysis that addresses all the comments made in the SWAPE review. While the emissions are now higher, the results in the Recirculated DEIR are not identical to the SWAPE results due to some detailed parameters that were not available to SWAPE. Additionally, many of the SWAPE comments apply to both the Approved RSP and the Proposed RSPA analyses. The Recirculated DEIR shows a comparison of the Approved RSP to the Proposed RSPA includes that ROG emissions increase by approximately 29% rather than 23% in the DEIR, NOx emissions increase by approximately 55% rather than 30%, CO emissions increase by approximately 44% rather than 30%, SOx emissions increase by approximately 50% rather than 35%, PM10 emissions increase by approximately 45% rather than 30%, and PM2.5 emissions increase by approximately 48% rather than 30%. While the increases are of a higher magnitude increased the severity of the impact, the significance conclusions are the same as the original DEIR but recirculation disclosed the increase in severity to the public.
OR1-18	Even though these emissions were deemed significant in the DSEIR, the document must not only properly identify significant impacts, it must also describe how adverse those impacts will be. *Kings Co v. Hanford* (1990) 221 CA3d 692, 712-718. As a result, an updated DSEIR should be prepared that includes an updated model to adequately estimate the Project's operational warehouse	Refer to Response to OR1-17.

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	emissions, and additional mitigation measures should be incorporated in an effort to reduce the Project's emissions to a less-than-significant level.	
OR1-19	SWAPE also concludes that when these errors are corrected, the Project has 50% higher greenhouse gas emissions than set forth in the DSEIR, and 50% higher emissions than set forth in the 2010 EIR. (SWAPE, p. 15) Thus, the DSEIR's conclusion that the Project has no more significant greenhouse gas impacts is erroneous. The Project would increase GHG emissions from 180,000 metric tons per year to 270,000 metric tons per year – an increase of 90,000 MT, or 50%. This increase is 30 times greater than the SCAQMD CEQA significance threshold for GHGs of 3,000 MT/year. Thus, the DSEIR fails as an informational document for failing to disclose this significant impact of the Project [see table in Comment Letter OR1].	The GHG analysis has been updated in response to the SWAPE comments, including using the recommendations set forth by the SCAQMD. While the magnitude of the GHG emissions is larger, the percent increase from the Approved RSP to the Proposed RSPA changes from 33% to 47%. The SCAQMD Tier 3 GHG threshold of 3,000 MT/yr is intended for individual projects, not specific plans. SCAQMD Tier 4 GHG thresholds are the appropriate threshold for this project, as discussed in the DEIR. This was also included in the Recirculated DEIR, which was made available for public review and comment from September 26, 2016 to November 10, 2016.
OR1-20	SWAPE concludes that the DSEIR fails to propose all feasible mitigation measures. The City may not issue a statement of overriding considerations until all feasible mitigation measures are implemented. SWAPE identifies numerous feasible mitigation measures that should be required to reduce project air quality impacts. Many of these measures have been implemented for other projects or are recommended by the SCAQMD or other public agencies. Additional mitigation measures that could be implemented include, but are not limited to, the following: [4] • Use Zero-VOC emission paints; ○ The Project Applicant should consider the use of zero-VOC emission paints, which has been required for numerous projects that have undergone CEQA review. Zero-VOC emission paints are commercially available. Other low-VOC standards should be incorporated into mitigation including use of "super-compliant" paints, which have a VOC standard of less than 10 g/L. • Use material that does not require paint;	The recommended mitigation measures have been reviewed and all feasible mitigation measures will be added to the Final SEIR as Mitigation Measures AQ 6 through AQ 10, in addition to Mitigation Measures AQ 1 through AQ 5. The measures added are: **AQ-6:** The construction contractor shall be required to utilize Super-Compliant VOC paints, which are defined by SCAQMD as meeting the "super-compliant" VOC standard of 10 grams per liter (g/L). Use of HVLP or electrostatic spray equipment shall be encouraged. **AQ 7:** Exterior and interior finishes that do not require painting shall be used where feasible **AQ 8:** Buildings shall be oriented and incorporate landscaping to maximize passive solar; heating during cool seasons, and minimize solar heat gain during hot seasons where feasible depending upon site condition and topography. **AQ 9:** The Project shall commit to 2016 Title 24 standards for building and site efficiency to reduce energy and water usage. **AQ 10:** Tenants shall be encouraged to educate employees on energy efficiency measures.

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	○ Using materials that do not require painting is a common mitigation measure where VOC emissions are a concern. Interior and exterior surfaces, such as concrete, can be left unpainted. • Use spray equipment with greater transfer efficiencies; ○ Various coatings and adhesives are required to be applied by specified methods such as electrostatic spray, high-volume, low-pressure (HVLP) spray, roll coater, flow coater, dip coater, etc. in order to maximize the transfer efficiency. Transfer efficiency is typically defined as the ratio of the weight of coating solids adhering to an object to the total weight of coating solids used in the application process, expressed as a percentage. When it comes to spray applications, the rules typically require the use of either electrostatic spray equipment or HVLP spray equipment. The SCAQMD is now able to certify HVLP spray applicators and other application technologies at efficiency rates of 65 percent or greater. [5] • Use passive solar design, such as:[6],[7] ○ Orient buildings and incorporate landscaping to maximize passive solar; heating during cool seasons, and minimize solar heat gain during hot seasons; and ○ Enhance natural ventilation by taking advantage of prevailing winds. • Reduce unnecessary outdoor lighting by utilizing design features such as limiting the hours of operation of outdoor lighting. • Develop and follow a “green streets guide” that requires: ○ Use of minimal amounts of concrete and asphalt; ○ Installation of permeable pavement to allow for storm water infiltration; and ○ Use of groundcovers rather than pavement to reduce heat reflection.[8]	

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	• Implement Project design features such as:
	  ○ Shade HVAC equipment from direct sunlight;
	  ○ Install high-albedo white thermoplastic polyolefin roof membrane;
	  ○ Install high-efficiency HVAC with hot-gas reheat;
	  ○ Install formaldehyde-free insulation; and
	  ○ Use recycled-content gypsum board.
	• Provide education on energy efficiency to residents, customers, and/or tenants.
	• Provide information on energy management services for large energy users.
	• Meet "reach" goals for building energy efficiency and renewable energy use.
	• Install solar, wind, and geothermal power systems and solar hot water heaters.
	• Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on all building roofs and/or on the Project site to generate solar energy for the facility.
	• Include energy storage where appropriate to optimize renewable energy generation systems and avoid peak energy use.
	• Plant low-VOC emitting shade trees, e.g., in parking lots to reduce evaporative emissions from parked vehicles.
	• Use CARB-certified or electric landscaping equipment in project and tenant operations; and introduce electric lawn, and garden equipment exchange program.
	• Install an infiltration basin to provide an opportunity for 100% of the storm water to infiltrate on-site.
	[4] http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf	

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	[5] Santa Barbara Air Pollution Control District, Scope and Content of Air Quality Sections in Environmental Documents, September 1997. [6] Butte County Air Quality Management District, Indirect Source Review Guidelines, March 1997. [7] See Irvine Sustainable Travelways "Green Street" Guidelines; www.ci.irvine.ca.us/civica/filebank/blobdload.asp?BlobID=8934; and Cool Houston Plan; www.harc.edu/Projects/CoolHouston. [8] See Irvine Sustainable Travelways "Green Street" Guidelines; www.ci.irvine.ca.us/civica/filebank/blobdload.asp?BlobID=8934; and Cool Houston Plan; www.harc.edu/Projects/CoolHouston.	
OR1-21	In addition to the measures discussed above, the SCAQMD has previously recommended additional mitigation measures for operational NOx emissions that result primarily from truck activity emissions for similar projects. These measures would also effectively reduce the Project's operational VOC, NOx, CO, PM_{10}, $PM_{2.5}$, and GHG emissions. In this case, these measures would apply to the Project's proposed industrial and commercial land uses. Measures recommended for the Waterman Logistic Center that are also applicable for this Project include[9]: • Provide electric vehicle charging stations that are accessible for trucks. • Provide electrical hookups at the onsite loading docks and at the truck stops for truckers to plug in any onboard auxiliary equipment. ○ According to Mitigation Measure AQ-12 of the 2010 Approved FEIR, the Project proposes to equip only 10 percent of the loading docks for the warehouse/distribution center uses with these electrical hookups (p. 3-24). However, we require that this measure be extended to all of the loading docks for the warehouse/distribution center uses, as well as all of the loading docks for all of the other proposed land uses, such as the commercial and retail uses. • Require the proposed warehouse to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in.	As the final tenants and precise uses of the proposed industrial and commercial land uses have not been determined, it is infeasible to implement tenant specific conditions. Mitigation Measure AQ 5 requires that check-in points for trucks are well inside the facility property to ensure that trucks are not queuing outside of the facility, requires truck routes to be marked with trailblazer signs, and encourage traffic synchronization. The recommended mitigation measures have been reviewed and those determined to be feasible, or modified for feasibility, will be added to the Final SEIR as Mitigation Measures AQ 11 through AQ 13. The measures added are: **AQ 11:** Preferential parking spaces shall be offered to car pools and van pools. **AQ 12:** The Project shall provide electrical capacity for installation of electrical hookups at onsite loading docks and for electric vehicle charging stations. **AQ 13:** The Project shall provide on-site food vending machines, refrigerator, and microwave at the Project site for warehouse and industrial uses that exceed 500,000 square feet.

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	• Limit the daily number of trucks allowed at the facility to levels analyzed in the DSEIR and 2010 EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level. • Limit the truck trip miles allowed to levels analyzed in the DSEIR and 2010 EIR. If higher truck trip miles are anticipated or required, the Lead Agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level. • Design the site such that any check-in point for trucks is well inside the facility to ensure that there are no trucks queuing outside of the facility. • On-site equipment should be alternative fueled. • Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to travel through residential neighborhoods. • Improve traffic flow by signal synchronization. • Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas. • Should the proposed Project generate significant emissions, the Lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in emissions, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts. [9] SCAQMD Comment Letter in Response to MND for the Waterman Logistic Center, January 2018, available at: http://www.aqmd.gov/docs/default-source/ceqa/comment- letters/2015/january/mndwaterman.pdf	

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OR1-22	Finally, in addition to the measures described above, the DSEIR proposes to implement the following mitigation measures to reduce operational VOC, NOx, CO, PM_{10}, $PM_{2.5}$, and GHG emissions for the proposed the Renaissance Market Place and Planning Area 108, exclusively (p. 1-7). Therefore, we propose that these mitigation measures also be extended to the entire RSPA in order to reduce emissions to the maximum extent feasible. These mitigation measures include:
	• Prior to the issuance of building permits, the Project applicant shall submit to the satisfaction of the Public Works Director, evidence that development within the RSPA comply with Title 24 of the California Code of Regulations (CCR) established by the CEC regarding energy conservation and green buildings standards. The Project applicant shall incorporate the following in building plans:
	  ○ Low-emission water heaters shall be used. Solar water heaters are encouraged.
	  ○ Exterior windows shall utilize window treatments for efficient energy conservation (p. 1-7).
	• Design all project buildings to meet or exceed the California Building Code's (CBC) Title 24 energy standard, including, but not limited to, any combination of the following:
	  ○ Increase insulation such that heat transfer and thermal bridging is minimized;
	  ○ Limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption; and
	  ○ Incorporate ENERGY STAR or better rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment.
	• Install efficient lighting and lighting control systems. Use daylight as an integral part of the lighting systems in buildings.
		As the final tenants and precise uses of the proposed industrial and commercial land uses have not been determined, it is infeasible to implement tenant specific conditions. Mitigation Measure AQ 9 identifies the Project's commitment to implementation of the 2016 Title 24 energy standards to reduce energy and water usage. Mitigation Measure AQ 12 identifies that the project will provide electrical capacity for installation of electrical hook ups at loading docks and for electric vehicle charging stations.

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	• Install "cool" roofs and cool pavements. • Install energy-efficient heating and cooling systems, appliances and equipment, and control systems. • Install solar lights or light-emitting diodes (LEDs) for outdoor lighting or outdoor lighting that meets the City of Rialto City Code. • Install solar photovoltaic or other technology to generate electricity on-site to reduce consumption from the electrical grid. • Install electrical vehicle charging stations to promote the use of electrical vehicles (p. 1-13). These measures are more stringent and prescriptive than those measures identified in the 2010 Approved EIR for the RSP and in the DSEIR for the RSPA. When combined together, these measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduces emissions released during Project operation. An updated DSEIR must be prepared to include additional mitigation measures, as well as include an updated air quality and greenhouse gas analysis to ensure that the necessary mitigation measures are implemented to reduce operational emissions to below thresholds. Furthermore, the Project Applicant needs to demonstrate commitment to the implementation of these measures prior to Project approval, to ensure that the Project's operational emissions are reduced to the maximum extent possible.	
OR1-23	Traffic engineer, Daniel Smith, PE, concludes that the DSEIR's traffic analysis is fatally flawed and fails to include numerous feasible mitigation measures. Mr. Smith concludes that the DSEIR fails to disclose significant impacts of the Project on 13 roadway segments. (Smith, p. 2). This renders the document legally inadequate since one of the primary functions of any EIR is to identify significant impacts of the project. Furthermore, to the DSEIR states that if levels of service ("LOS") fall below acceptable levels at these roadway segments in the future,	Impacts and improvements to all roadway segments have been provided in the EIR and TIA (Table 3-H of TIA). The 13 segments referred to in the comment are within the project area or immediately adjacent to the project area. A detailed analysis of these locations were conducted, and the responsibility to construct these improvements are on the project. It should also be noted that several of these improvements are under construction and/or planning.

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	the actual mitigation measure proposed, TRANS-1, leaves it up to the City Traffic Engineer to review individual site-specific development proposals, determine whether they would cause LOS failures, and determine what of the improvements listed on the above cited tables the individual development would be responsible for either constructing or making monetary contribution toward the cost of construction. This indefinite future mitigation at the discretion of the City Traffic Engineer constitutes a deferral of mitigation that is improper under CEQA. "A study conducted after approval of a project will inevitably have a diminished influence on decisionmaking. Even if the study is subject to administrative approval, it is analogous to the sort of post hoc rationalization of agency actions that has been repeatedly condemned in decisions construing CEQA." *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 307. "[R]eliance on tentative plans for future mitigation after completion of the CEQA process significantly undermines CEQA's goals of full disclosure and informed decisionmaking; and[,] consequently, these mitigation plans have been overturned on judicial review as constituting improper deferral of environmental assessment." *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 92. "Deferral of the specifics of mitigation is permissible where the local entity commits itself to mitigation and lists the alternatives to be considered, analyzed and possibly incorporated in the mitigation plan. [Citation.] On the other hand, an agency goes too far when it simply requires a project applicant to obtain a biological [or other] report and then comply with any recommendations that may be made in the report." *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1275.	Analysis of the impacts have not been deferred because improvement costs have been identified and fair shares assigned to the project. The legal citations in the comment are not applicable to the RSPA since the improvements recommended are specific improvements, and the future discretion of City Traffic Engineer is merely to identify timing of implementation based on how traffic growth occurs in the area.
OR1-24	Mr. Smith also points out that the DSEIR relies on mitigation measures without identifying adequate funding to implement those measures. The measures proposed in the DSEIR would cost over $11 million. (Smith p. 2). The DSEIR does not identify funding streams for over $2.5 million of this amount. *Id.* Mitigation fees are	See Response OR1-23. Several of the improvements identified in the TIA are under construction and/or planning. Improvements where the project has a direct impact (for example, at intersections providing access to project parcels) will be constructed by the project. Other impacts are

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	not adequate mitigation unless the lead agency can show that the fees will fund a specific mitigation plan that will actually be implemented in its entirety. *Napa Citizens for Honest Gov. v. Bd. Of Supervisors* (2001) 91 CallApp.4th 342 (no evidence that impacts will be mitigated simply by paying a fee); *Anderson First Coal. v. City of Anderson* (2005) 130 Ca.App.4th 1173 (traffic mitigation fee is inadequate because it does not ensure that mitigation measure will actually be implemented); *Kings Co. Farm Bureau v. Hanford* (1990) 221 Cal.App.3d 692. A recirculated DSEIR is required to disclose these significant impacts and to propose specific mitigation measures to reduce the impacts, with adequate funding.	cumulative impacts and the project will pay a fair share and/or fees towards those improvements. It should also be noted that the City is working on a Citywide Fee Program to address transportation needs for the entire City. This fee program will include improvements needed at major intersections, and will address the effects of ambient growth in areas outside the Specific Plan area.
OR1-25	The DSEIR concludes that traffic from the Project will be similar to traffic calculated in the 2010 EIR. However, Mr. Smith points out that this conclusion ignore increased traffic on State Route 210 that has occurred since 2010. The local roadway traffic counts for the 2010 EIR were taken in 2008 or in 2006 and 2007 and factored up to assumed 2008 conditions based on growth rates; the state highway system counts were from 2007. However, in this period of time, SR 210 in the immediate RSP Project area was undergoing reconstruction from a surface highway to a freeway with the north south cross streets being reconstructed as interchanges and overcrossings and much of the surface street infrastructure in both the north-south and east-west directions was discontinuous. Consequently, the traffic baseline conditions against which the Project's regional impacts were measured was of dubious representativeness. As evidence of this, we present the following comparison of Caltrans posted 2007 and 2014 traffic volumes for SR 210 [see table in Comment Letter OR1]. As can be seen in the table, background traffic volumes on SR 210 have increased in the Project area between 2007 and 2014 by	The comment incorrectly states traffic volumes for the SR-210 used in the 2010 EIR. Since the SR-210 freeway opened during the time the previous analysis was being conducted, the base year 2007 traffic counts were adjusted. Because SR-210 was not complete in 2007 when the most recent traffic counts were collected, the traffic volumes for the segments on SR-210 between I-15 and I-215 were calculated by taking the ratio of the year 2000 CTP model traffic volumes on SR-210 west of I-15 to those east of I-15, and applying these ratios to the existing (2007) traffic volumes on the segments west of I-15. For example, the comment letter notes that the 2007 traffic volume for the peak hour on the 210 freeway east of Sierra Avenue was 1,150 and the 2014 traffic volume was 8,600. The 2010 TIA used traffic volumes of 7,110 for 2008 because of the mathematical adjustments discussed above (2014 ground counts reported in the comment is 8,600). Similarly, the 2008 volume for the segment west of I-215 reported in the comment letter was 2,700 whereas the adjusted 2008 volume was 7,162 (2014 ground counts reported in the comment is 8,500). As seen in the above examples, the resulting traffic volumes used in the baseline analysis are very similar to those in the 2014 counts database, especially after accounting for the growth in the region as well as the portions of the RSP that have

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	between 353 to 900 percent and peak hour volumes have increased between 315 and 748 percent.	already been constructed. A table comparing traffic volumes are included in the detailed response to comment OR1-50. As seen in the table, growth between the base year of the 2010 TIA and 2014 counts are consistent to the growth seen at other locations based on the traffic model. It should be noted that the 2010 analysis disclosed impact to the freeway segments at all but 5 segments evaluated. Impacts from the RSPA are anticipated to be similar as similar number of trips are being generated and assigned to the freeway system. Therefore, the impacts to the freeway system will be similar to those evaluated in the 2010 EIR.
OR1-26	Given this change in SR 210 background traffic, even though there may be no meaningful difference in the *amount* of traffic contributed by the RSPA versus the RSP, Mr. Smith concludes that given the massive change in background traffic on the SR 210, the amount of traffic the RSPA does contribute is clearly likely to have far more significant consequences than was RSP traffic measured against the anomalous traffic baseline that was used in the 2010 EIR. In this circumstance, compliance with the good faith effort to disclose impact that CEQA demands logically requires complete analysis of the regional traffic impacts against the current traffic baseline. The DSEIR is deficient for failing to do this.	The traffic volumes used in the baseline analysis for the 2010 EIR reported in this comment are incorrect. Please see response to OR1-25. The comment letter notes that the 2007 traffic volume for the peak hour on the 210 freeway east of Sierra Avenue was 1,150 and the 2014 traffic volume was 8,600. The 2010 TIA used traffic volumes of 7,110 for 2008 because of the mathematical adjustments discussed above (2014 ground counts reported in the comment is 8,600). Similarly, the 2008 volume for the segment west of I-215 reported in the comment letter was 2,700 whereas the adjusted 2008 volume was 7,162 (2014 ground counts reported in the comment is 8,500). These growth patterns are consistent with the observed growth from the traffic models used in the analysis. It should also be noted that portions of the RSP have been constructed, which also contribute to the existing traffic counts. The 2010 TIA also disclosed significant impacts at all but 5 freeway segments. Therefore, the finding of significant impacts are disclosed in the RSP EIR and will remain for the RSPA.
OR1-27	This drastically increased traffic on SR 210 constitutes a “substantial change … with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the	Refer to Response to OR1-25.

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	severity of previously identified significant effects." CEQA Guidelines 15162(a)(2). A revised DSEIR must be prepared which accurately describes the traffic setting for the Project, which is much different than it was in 2010. As the court stated in *Friends of Eel River v. Sonoma County Water Agency*, 108 Cal. App. 4th 859, 874 (2003): There is good reason for this requirement: "Knowledge of the regional setting is critical to the assessment of environmental impacts. . . . The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context." (Guidelines, § 15125, subd. (c).) We interpret this Guideline broadly in order to "afford the fullest possible protection to the environment." (*Kings County Farm Bureau, supra*, 221 Cal. App. 3d 692, 720.) In so doing, we ensure that the EIR's analysis of significant effects, which is generated from this description of the environmental context, is as accurate as possible. (See also Remy et al., *Guide to the Cal. Environmental Quality Act (CEQA)* (10th ed. 1999), pp. 374-376.)	
OR1-28	Recirculation of an EIR prior to certification is required "when the new information added to an EIR discloses: (1) a new substantial environmental impact resulting from the project or from a new mitigation measure proposed to be implemented; (2) a substantial increase in the severity of an environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance; (3) a feasible project alternative or mitigation measure that clearly would lessen the environmental impacts of the project, but which the project's proponents decline to adopt; or (4) that the draft EIR was so fundamentally and basically inadequate and conclusory in nature that public comment on the draft was in effect meaningless." CEQA Guidelines §15162; *Laurel Heights Improvement Assn. v. Regents of University of Cal.* (1993) 6 Cal. 4th	The DSEIR has been revised and recirculated.

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	1112, 1130 (citing *Mountain Lion Coalition v. Fish* & Game *Comm'n* (1989) 214 Cai.App.3d 1043). Recirculation is required where "significant new information" has been added to an EIR. *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 447. New information is “significant” where it results in a change to the EIR's analysis or mitigation of a substantial adverse environmental effect to the EIR. *Id.* Here, the DSEIR must be revised to address the many deficiencies identified above.	
OR1-29	According to the DSEIR, CalEEMod was used to estimate the construction and operational criteria air pollutant emissions from the Renaissance Marketplace and Planning 108 areas, and was used to estimate the operational emissions from the previously approved RSP and the RSPA (DSEIR, p. 4.2-17). CalEEMod provides recommended default values based on site specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but CEQA requires that such changes be justified by substantial evidence.[1] Once all the values are inputted into the model, the Project's construction and operational emissions are calculated, and “output files” are generated. These output files disclose to the reader what parameters were utilized in calculating the Project's air pollution emissions, and make known which default values were changed as well as provide a justification for the values selected.[2] After review of the DSEIR and associated appendices, we find that the CalEEMod output files for the Renaissance Marketplace and Planning 108 areas were completely omitted. Rather, the Air Quality and Greenhouse Gas Analysis (Appendix C) only provides the output files for the RSP’s and the RSPA’s operational emissions (Appendix C, pp. 84). Without the Renaissance Marketplace and	See the response to comment OR1-8 regarding the omissions of CalEEMod output files which were provided in the Recirculated DEIR.

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	Planning 108 output files, we are unable to verify that the assumptions used within these models are correct and cannot determine what default values were used. While Appendix C of the DSEIR discusses what assumptions were used in the models for calculating the Renaissance Marketplace's and Planning 108's construction and operational emissions, we are unable to verify that these assumptions were correctly inputted into the model (Appendix C, p. 34, 51). Furthermore, we are unable to review the CalEEMod output files to determine if any other default values were changed or if project specific information was omitted from the model. As a result, the criteria air pollutant emission estimates provided in the DSEIR and associated appendices are unreliable and should not be used to determine Project significance, since there is no documentation verifying the values. Without providing the entire CalEEMod report, the reviewer cannot fully understand the assumptions that were made about the Project, and cannot verify whether those assumptions are justified. Furthermore, by failing to provide the CalEEMod output files for Planning Area 108 and the Renaissance Marketplace, we are unable to prepare an updated construction health risk, as discussed in the sections below. An updated DSEIR should be prepared that adequately address the air quality impacts associated with the proposed Project and provides the complete CalEEMod output files. [1] CalEEMod User Guide, p. 2, 9, *available at:* http://www.caleemod.com/ [2] CalEEMod User Guide, p. 7, 13, *available at:* http://www.caleemod.com/ (A key feature of the CalEEMod program is the "remarks" feature, where the user explains why a default setting was replaced by a "user defined" value. These remarks are included in the report.)	
OR1-30	Even though the Renaissance Market Place and Planning Area 108 CalEEMod output files were not provided, we were still able to review the RSPA and RSP modeling outputs. When reviewing the RSPA's CalEEMod output files, we found that several of the values inputted into the model are not consistent with information disclosed in the DSEIR and are not consistent with guidance set forth by the South Coast Air Quality Management District (SCAQMD) for large warehousing projects. As a result, emissions	See the response to comment OR1-8 regarding the omissions of CalEEMod output files. The AQ analysis has been updated in response to the SWAPE comments. The updated modeling follows all SCAQMD recommendations combined with the detailed traffic analysis conducted for this project. This was all included in the Recirculated DEIR, which was made available for public review and comment from September 26, 2016 to November 10, 2016.

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	associated with operation of the Project are greatly underestimated. An updated DSEIR should be prepared to adequately assess the potential impacts that operation of the Project may have on regional and local air quality.	
OR1-31	According to the DSEIR and associated appendices, the RSPA includes the development of several warehouse land uses. Even though the DSEIR proposes to construct multiple large warehouses,[3] the emissions from these proposed warehouses are not accounted for within the RSPA's air model. This presents a significant issue, as large warehouse projects generate a higher volume of heavy duty trucks when compared to other industrial land uses.[4] Therefore, by failing to account for these proposed warehouse land uses within the CalEEMod model, the Project's operational emissions are greatly underestimated. An updated air quality analysis should be prepared to adequately evaluate the air quality impacts of the proposed warehouse land uses within the RSPA. According to the DSEIR's Traffic Impact Analysis (Appendix H), the proposed Business Center and Employment land uses are anticipated to be made up of warehouses (see excerpt below) (Appendix H, Table 2-A, pp. 41) [see table in Comment Letter OR1]. This assertion is further supported by the land uses proposed in Planning Area 108. According to the DSEIR, Planning Area 108, which is identified as a Business Center land use, includes the development of three warehouse buildings totaling approximately four million square feet of warehouse space (see figure below) (DSEIR, Figure 3-6, p. 3-17) [see figure in Comment Letter OR1]. Therefore, using this information, we can reasonably assume that the proposed Business Center (includes Planning Area 108) and Employment land uses would be made up of warehouses, which means that RSPA's operational emissions should have been modeled assuming that these land uses would be made up of warehouses. Review of the CalEEMod output files provided in	See the response to comment OR1-11.

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	Appendix C of the DSEIR, however, demonstrates that no warehousing land use type was used when modeling emissions. Rather, the proposed warehouse land uses were modeled as General Light Industry (see excerpt below) (Appendix C, pp. 123) [see figure in Comment Letter OR1]. By failing to account for the proposed warehouse land uses, the RSPA's operational emissions are greatly underestimated. According to the CalEEMod User's Guide, the land uses, size features, and population are used throughout CalEEMod in determining default variables and calculations. [5] Therefore, by relying upon a land use type that is not representative of the RSPA's warehouse land uses, any default variables and calculations relied upon by the Project applicant within the model are incorrect, and would result in incorrect emission estimates. As a result, the DSEIR's CalEEMod model for the RSPA should not be relied upon to determine Project significance. An updated air quality analysis should be prepared to adequately evaluate the air quality impacts of the proposed warehouse land uses within the RSPA, and additional mitigation should be identified and incorporated, where necessary. [3] Large warehouses are defined by the SCAQMD as warehouse projects and distribution centers greater than 100,000 square feet. See CalEEMod User Guide, Appendix E: Technical Source Documentation, SCAQMD, available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air- quality-analysis/high-cube-resource-caleemod-appendix-e.pdf?sfvrsn=2, p. 12 [4] CalEEMod User Guide, Appendix E: Technical Source Documentation, SCAQMD, available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/high-cube-resource-caleemod-appendix-e.pdf?sfvrsn=2, p. 12 [5] CalEEMod User's Guide, p. 14, available at: http://www.caleemod.com/	
OR1-32	Because the DSEIR fails to account for the proposed warehouse land uses within the CalEEMod model, emissions from refrigerated warehouses are also unaccounted for. Assuming that the proposed warehouse land uses will not require any sort of refrigeration and/or cold storage, however, is inconsistent with information disclosed in the DSEIR, the 2010 Approved DEIR, and the 2010	See the response to comment OR1-12.

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	Approved FEIR. As a result, the Project's operational emissions may be grossly underestimated. As previously stated, the RSPA proposes the relocation of business and industrial uses to the west of Linden Avenue, the relocation of all residential land uses and the public park to the east side of Linden Avenue, and the implementation of the Renaissance Marketplace retail development and the Planning Area 108 industrial/warehouse development (DSEIR, p. 1-2). Therefore, with the exception of the Renaissance Marketplace and the Planning Area 108 development, it can be reasonably assumed that the RSPA's land uses are, more or less, similar to the RSP's land uses. As a result, information disclosed in the 2010 Approved DEIR and the 2010 Approved FEIR for the RSP can also be used to provide some insight on the RSPA's land uses. According to the 2010 Approved DEIR and 2010 Approved FEIR, the previously approved RSP proposed to implement mitigation to reduce emissions from refrigerated warehouses and trucks equipped with transportation refrigeration units (TRU), which are needed to transfer refrigerated and frozen items to and from the site (p. 1-10). Mitigation Measure AQ-12 of the 2010 Approved DEIR and FEIR states, "A minimum of ten percent of the loading docks for the warehouse/distribution center uses shall contain outdoor electrical hook-up sources for service equipment and trucks such as transportation refrigeration units. In addition, electrical hookups shall be provided at the loading docks located at refrigerated warehouses for transportation refrigeration units visiting these locations. All trucks with transportation refrigeration units are required to connect to the electrical hookups while loading or unloading deliveries to the proposed project. Trucks with transportation refrigeration units are prohibited from accessing refrigerated warehouses unless they have the capability to connect to the electrical hookups" (DEIR, Table 1-1, p. 1-10; FEIR, Table 1-1, p. 3-24).	

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	Furthermore, the 2010 Approved DEIR also assumed that approximately 11 percent of the total warehouse floor space for the previously approved RSP (approximately 1,023,112 SF) would be used for cold storage (p. 4.17-35). The fact that the 2010 Approved DEIR and FEIR proposed to equip the loading docks at refrigerated warehouses with electrical hookups for TRU trucks, and the fact that the 2010 Approved DEIR assumed that 11 percent of the total warehouse uses would require cold storage indicates that not only will there be refrigerated warehouses on-site, but that TRU trucks will also be traveling to and from the site during Project operation. In addition to the information provided in the 2010 Approved DEIR and FEIR, the 2016 DSEIR also indicates that refrigeration may be required on-site for the proposed warehouse land uses. According to the DSEIR, the RSPA will be compliant with measures set forth by the California Air Resources Board (CARB) regarding industrial refrigeration and mobile-source refrigerants (p. 4.4-25, 4.4-27). This indicates that industrial refrigeration and mobile-source refrigerants could potentially be located on- site, and will comply with standards set forth by CARB. As a result, it can be reasonably assumed that at least a portion of the proposed warehouse land uses within the RSPA will be made up of refrigerated warehouses. By modeling the Project's emissions assuming that no refrigerated warehouses will operate on-site, the DSEIR greatly underestimates the actual emissions that would occur once the RSPA is operational. Refrigerated warehouses release more air pollutants and greenhouse gas (GHG) emissions when compared to unrefrigerated warehouses for several reasons. First, warehouses equipped with cold storage (refrigerators and freezers, for example) are known to consume more energy when compared to warehouses without cold storage.[6] Second, warehouses equipped with cold storage typically require refrigerated trucks, which are known to idle for much longer, even up to an hour, when compared to unrefrigerated hauling trucks.[7] Lastly, according to a July 2014 *Warehouse Truck Trip Study Data Results and Usage* presentation prepared by the SCAQMD, it was found that hauling trucks that require refrigeration	

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	result in greater truck trip rates when compared to non-refrigerated hauling trucks.[8] As discussed by SCAQMD, "CEQA requires the use of 'conservative analysis' to afford 'fullest possible protection of the environment.'"[9] As a result, the most conservative analysis should be conducted. With this in mind, because the DSEIR, the 2010 Approved DEIR, and the 2010 Approved FEIR indicate the need for refrigerated warehouses, the proposed warehouse land uses should be modeled as "Refrigerated Warehouse-No Rail," or at the very least, a portion of the warehouse land uses should be modeled as "Refrigerated Warehouse-No Rail," with the remaining portion of the buildings modeled as "Unrefrigerated Warehouse-No Rail," so as to take into consideration the possibility that the warehouses will use both cold storage and non-cold storage. By not including refrigerated warehouses as a potential land use in the CalEEMod model, the Project's operational emissions may be grossly underestimated. Unless the Project Applicant can demonstrate that the proposed warehouse buildings will be limited to unrefrigerated warehouse uses, exclusively, it should be assumed that a mix of cold and non-cold storage will be provided on-site. An updated DSEIR should be prepared to account for the possibility of refrigerated warehouse needs by future tenants. [6] Managing Energy Costs in Warehouses, Business Energy Advisor, available at: http://bizenergyadvisor.com/warehouses [7] Estimation of Fuel Use by Idling Commercial Trucks," p. 8, available at: http://www.transportation.anl.gov/pdfs/TA/373.pdf [8] Warehouse Truck Trip Study Data Results and Usage" Presentation. SCAQMD Mobile Source Committee, July 2014, available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate- study-for-air-quality-analysis/finaltrucktripstudymsc072514.pdf?sfvrsn=2, p. 7, 9 [9] "Warehouse Truck Trip Study Data Results and Usage" Presentation. SCAQMD Inland Empire Logistics Council, June 2014, available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/final-ielc_6-19-2014.pdf?sfvrsn=2	

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OR1-33	The DSEIR's CalEEMod model also fails to apply a site-specific truck trip rate to the proposed warehouse land uses within the RSPA. Rather, the DSEIR relies upon an unsubstantiated trip rate to estimate the proposed warehouse emissions, which results in an underestimation of the number of truck trips these warehouses will generate once operational. This underestimation presents a significance issue, as truck emissions represent more than 90 percent of air quality impacts from these types of projects. [10] Furthermore, by failing to apply a site-specific truck trip rate to the proposed warehouse land uses within the RSPA, the DSEIR is inconsistent with guidance set forth by the SCAQMD as well as with information provided in other technical studies conducted for the Project. As a result, the RSPA's operational mobile-source emissions are greatly underestimated. The SCAQMD is currently the leading air quality management district in assessing and analyzing the air quality impacts that result from heavy-duty truck trips generated by warehouse projects within Sothern California.[11] The SCAQMD recommends the use of the Institute of Transportation Engineers Trip Generation Manual, 9th Edition, 2012 (ITE Manual) in conjunction with their truck mix by axle-type to better quantify trip rates associated with local warehouse and distribution projects. According to the ITE Manual, an overall vehicle trip rate of 3.56 trips per thousand square feet (trips/TSF) should be used for Warehouse land uses (Land Use Code 150), which is consistent with the trip rate used in the DSEIR's Traffic Impact Analysis (Table 2-A, pp. 41).[12] Furthermore, according to the DSEIR's Traffic Impact Analysis, a passenger car trip rate of 2.136 trips/TSF should also be used for the proposed warehouse land uses (Table 2-A, pp. 41). When these trip rates are utilized, we find that the RSPA's warehouse land uses would generate approximately 31,410 passenger car trips and approximately 20,881 truck trips for a total of 52,291 trips per day (see table below) [see table in Comment Letter OR1]. Therefore, using the recommendations set forth by the SCAQMD and values provided in the DSEIR's Traffic Impact Analysis, the	See the response to comment OR1-13.

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	DSEIR should have used the same daily vehicle and truck trip rates as described in the table above. When we reviewed Appendix C of the DSEIR, however, we found that the CalEEMod model relied upon an overall trip rate of 3.191 trips/TSF to estimate the number of daily vehicle and truck trips the warehouse land uses would generate during operation, which is not only inconsistent with the DSEIR's Traffic Impact Analysis, but is also inconsistent with the trip rate set forth by the Institute of Transportation Engineers for Warehouse land uses (ITE 150 Warehouse) (DSEIR, Appendix C, pp. 124). When this incorrect trip rate is used, the proposed warehouse land uses would generate approximately 22,139 passenger car trips (LDA) and approximately 5,336 truck trips (LHD1, MHD, HHD), for a combined total of 27,475 trips per day (see table below) [see table in Comment Letter OR1]. As you can see in the tables above, the DSEIR's CalEEMod model underestimates the warehouses' number of daily trips made by passenger cars and trucks by 24,816 trips, or approximately 9 million trips per year. By using the incorrect trip rates, the DSEIR inaccurately estimates the number of passenger car and truck trips the RSPA's warehouse land uses will generate during operation. 10 Warehouse Truck Trip Study Data Results and Usage, SCAQMD, available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality- analysis/finaltrucktripstudymsc072514.pdf?sfvrsn=2, p. 2 11 High Cube Warehouse Trip Rate Study for Air Quality Analysis, SCAQMD, available at:http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/high-cube-warehouse 12 Institute of Transportation Engineers Trip Generation Manual, 9th Edition, 2012, p. 267	
OR1-34	The DSEIR's CalEEMod model also fails to apply a site-specific truck fleet mix to the proposed warehouse land uses within the RSPA. Rather, the DSEIR and associated Air Quality Report rely upon the CalEEMod default fleet mix to estimate emissions from the proposed warehouse uses, which underestimate the percent of total trips that will be made by trucks during operation. As previously stated, this underestimation presents a significance issue, as heavy duty truck emissions represent more than 90	See the response to comment OR1-15.

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	percent of air quality impacts from these types of projects. As a result, the RSPA's operational mobile- source emissions are greatly underestimated. The SCAQMD recommends that lead agencies assume a truck fleet mix of 40%. According to *Appendix E: Technical Source Documentation* of the CalEEMod User's Guide, "in order to avoid underestimating the number of trucks visiting warehouse facilities," SCAQMD staff "recommends that lead agencies conservatively assume that an average of 40% of total trips are truck trips."13 This 40% truck fleet percentage is also used in the DSEIR's Traffic Impact Analysis to estimate the number of truck trips the RSPA's proposed warehouse land uses would generate (Table 2-A, pp. 41). Therefore, in an effort to remain consistent with guidance set forth by the SCAQMD, and with information used in other technical studies for the proposed Project, a truck fleet percentage of 40% should have been used to estimate the RSPA's warehouse emissions. Review of the DSEIR's CalEEMod output files, however, demonstrates that a truck fleet (LHDT1, MHD, and HHDT) percentage of approximately 11% was used, rather than the 40% value recommended by the SCAQMD (DSEIR, Appendix C, pp. 129). As a result, the RSPA's warehouse truck emissions are greatly underestimated. [13] "Appendix E Technical Source Documentation." CalEEMod User's Guide, July 2013, available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/high-cube-resource-caleemod-appendix-e.pdf?sfvrsn=2, pp. 15	
OR1-35	This 40% truck fleet mix is further broken down by the SCAQMD according to axle type, in order to accurately estimate the amount and types of trucks that will be accessing the proposed warehouses once operational. Specifically, the SCAQMD recommends that the following truck fleet mix be used for large warehouse projects: 22% of the total trucks as 2-axle trucks, 17.7% of the total trucks as 3-axle trucks, and 60.3% of the total trucks as 4+-axle trucks (see table below[see table in Comment Letter OR1]). [14]	See the response to comment OR1-15.

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	Therefore, the DSEIR should have also used these recommended truck mix percentages, as it provides a more project-specific estimation of the types of trucks that will most likely travel to and from the site during Project operation. Review of the CalEEMod model, however, demonstrates that the truck fleet mix percentages set forth by the SCAQMD were not used within the CalEEMod model (DSEIR, Appendix C, pp. 129). Rather, the model relies upon CalEEMod default fleet mix percentages to estimate the Project's emissions. Specifically, we find that the DSEIR uses the following truck fleet mix to model emissions: 49.2% of the total trucks as 2-axle trucks, 14.6% of the total trucks as 3-axle trucks, and 36.1% of the total trucks as 4+-axle trucks (see table below) (DSEIR, Appendix C, pp. 129) [see table in Comment Letter OR1]. As you can see in the tables above, the DSEIR underestimates the total number of HHD trucks by approximately 20%, underestimates the total number of MHD trucks by approximately 4%, and then over estimates the total number of LHDT1 trucks, which are the smallest, lowest emitting truck type of the three truck categories, by approximately 30%. By failing to utilize the warehouse-specific truck trip fleet mix set forth by the SCAQMD, the DSEIR underestimates the total number of heavy-duty and medium-duty truck trips the Project will generate during operation, and as a result, the Project's operational emissions are underestimated. [14] "Appendix E Technical Source Documentation." CalEEMod User's Guide, July 2013, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/high-cube-resource-caleemod-appendix-e.pdf?sfvrsn=2, pp. 15	
OR1-36	Finally, the DSEIR relies upon an incorrect truck trip length to model emissions from the RSPA's warehouse land uses. Rather, the DSEIR and associated Air Quality Report rely upon the CalEEMod default trip lengths to estimate emissions from the proposed warehouse uses, which underestimate the total miles traveled by the trucks accessing the RSPA's warehouses on a daily basis. Therefore, truck trip lengths set forth by the SCAQMD should have been used to estimate the RSPA's warehouse land use truck emissions, rather than the CalEEMod default values, as it provides a more realistic,	See the response to comment OR1-16.

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	site-specific trip length that trucks visiting the site will most likely travel. Furthermore, other CEQA evaluations for similar projects located near the Project site utilize SCAQMD recommended truck trip lengths to estimate project emissions. Therefore, it is reasonable for the proposed warehouse land uses to rely upon SCAQMD truck trip lengths as well. The DSEIR relies upon a CalEEMod default commercial-work (C-W) trip length of 16.6 miles, a CalEEMod default trip length of 8.4 miles for commercial-customer (C-C), and a CalEEMod default trip length of 6.9 miles for commercial-nonwork (C-NW) trips (see excerpt below) (Appendix C, pp. 128) [see table in Comment Letter OR1]. As you can see in the excerpt above, the RSPA's operational trips are allocated to either the C-W, C-C, or C-NW trip categories. According to Appendix A of the CalEEMod User Guide, the C-W represents trips made by an employee of the commercial land use sector while C-NW represents other trips associated with the land use besides those made by customers or workers, such as delivery vehicles.[15] Therefore, the DSEIR's CalEEMod model assumes that the heavy-duty trucks responsible for delivering goods to and from the Project site will have a trip length of 6.9 miles. The use of a 6.9-mile trip length, however, is entirely incorrect, as it greatly underestimates the trip length that heavy-duty trucks will most likely travel during operation. Furthermore, the use of this truck trip length is also inconsistent with trip lengths used for similar warehouse projects within southern California and the County of San Bernardino. As a result, the Project's operational emissions are greatly underestimated. [15] "Appendix A- Calculation Details for CalEEMod." CalEEMod User Guide, p. 20, available at: http://www.caleemod.com/	
OR1-37	For example, the Kimball Business Park Project, which proposes to construct approximately 1,203,050 square feet of warehouse and light industrial/business park uses within the City of Chino, uses a truck trip length of approximately 50 miles to estimate the Project's	See the response to comment OR1-16.

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	operational mobile-source emissions. The Air Quality Impact Analysis states, "In the last five years, the SCAQMD has provided numerous comments on the trip lengths for warehouse/distribution and industrial land use projects (33). The SCAQMD asserts that the model-default trip lengths in CalEEMod™ and the URBan EMISsions (URBEMIS) 2007 model (version 9.2.4) would underestimate emissions. The SCAQMD asserts that for warehouse, distribution center, and industrial land use projects, most of the heavy-duty trucks would be hauling consumer goods, often from the Port of Long Beach and Los Angeles (POLA and POLB) and/or to destinations outside of California. The SCAQMD states that for this reason, the CalEEMod™ and the URBan EMISsions model default trip length (approximately 12.6 miles) would not be representative of activities at like facilities. The SCAQMD generally recommends the use of a 40-mile one-way trip length".[16] Therefore, at the very least, the DSEIR should have used a one-way truck trip length of at least 40 miles for the RSPA's warehouse land uses, as it is consistent with guidance set forth by the SCAQMD as well as with the trip lengths used in other air quality analyses for similar warehouse projects located near the proposed Project. This conclusion is further supported by the SCAQMD's comments on the Mitigated Negative Declaration (MND) for the Waterman Logistic Center Project. The Waterman Logistic Center proposes to construct a 426,858 square feet of logistics warehouse buildings within the City of San Bernardino, which is only approximately 45 miles from proposed Project.[17] The Waterman Logistic Center's Air Quality Study utilized an internal truck trip length of 24.11 miles in accordance with the Southern California Association of Government Heavy Duty Truck Model. The SCAQMD, however, finds issue with this trip length, stating that most industrial land use types haul consumer goods from the Ports of Long Beach and Los Angeles as well as locations outside the SCAQMD boundaries, including	

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	Banning Pass, San Diego County line, and Cajon Pass (see excerpt below) [see figure in Comment Letter OR1]. As you can see in the excerpt above, the trip lengths from the Waterman Logistics Center project site to each of the locations listed by the SCAQMD are well over the 24.11-mile trip length, with the exception of Cajon Pass. Using SCAQMD's recommended methodology, "Assuming that 50 percent of all delivery trips will travel to and from the project and the Port of Los Angeles/Long Beach, the use of 24.11 miles as an average internal truck trip greatly underestimates the air quality impact."[18] Considering the fact that a trip length of 6.9 miles used in the DSEIR is much shorter than the 24.11-mile trip length used for the Waterman Project, and considering the fact that the SCAQMD still found the 24.11-mile trip length to be inadequate, we can reasonably assume the trip length utilized for the proposed Project is significantly shorter than the actual trip length that trucks will be using once the Project is in operation. Therefore, it is incorrect to assume that all trucks traveling to and from the site will be hauling consumer goods strictly within a 6.9-mile radius. In order to ensure that the DSEIR conservatively evaluates the potential for air quality impacts, the Lead Agency should utilize a trip length that is reflective of the potential truck trips, such as a trip length of 40 miles as recommended by the SCAQMD, or the Lead Agency should limit the truck trip miles allowed to levels analyzed in the DSEIR. By failing to use site specific values, the Project's truck trip lengths are significantly underestimated, and as a result, the Project's operational emissions are greatly underestimated. [16] Kimball Business Park Air Quality Impact Analysis, Urban Crossroads, available at: http://www.cityofchino.org/government-services/community-development/environmental-documents [17] SCAQMD Comment Letter on the Mitigated Negative Declaration (RDEIR) for the Proposed Waterman Logistics Center, January 8 2015, available at: http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/january/mndwaterman.pdf [18] *Ibid.*, p. 4.	

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OR1-38	In an effort to accurately estimate the RSPA's warehouse land use emissions, we prepared three updated air models using the most recent CalEEMod version, CalEEMod.2013.2.2 – one to model warehouse emissions from Passenger Cars (LDA), one to model warehouse emissions from heavy duty trucks, and one to model emissions from the remaining land uses within the RSPA, excluding the proposed warehouse uses. Since it is unknown how many tenants will require cold-storage, we conservatively assumed that approximately 15 percent of the proposed warehouse buildings will be made up of refrigerated warehouses. This percentage is consistent with studies conducted by the SCAQMD on composite warehouses within southern California[19] and is consistent with assumptions used in other CEQA evaluations prepared for similar projects.20 We utilized an overall trip rate of 3.56 trips per thousand square foot for both the refrigerated and unrefrigerated land uses, which reflects the updated trip rate provided by the 9th Edition ITE Trip Generation Manual for warehousing land uses (ITE Land Use Code 150). Consistent with the SCAQMD, we assumed that 40% of the warehouse vehicle trips would be made by trucks, and we applied the SCAQMD recommended truck fleet mix by axle type (LHDT1, MHD, and HHDT). Furthermore, we increased the operational truck trip length from 6.90 miles to 40 miles, which is consistent with recommendations set forth by the SCAQMD, and we relied upon the CalEEMod default passenger car trip length of 16.60 miles. When correct input parameters are used to model emissions from the proposed warehouse land uses, we find that the RSPA's peak operational criteria air pollutant emissions not only exceed SCAQMD regional thresholds, but these emissions also increase significantly when compared to the DSEIR's RSPA model (see table below) [see tables in Comment Letter OR1]. As you can see in the tables above, ROG emissions increase by approximately 25%, NOx emissions increase by approximately 490%, SOx emissions increase by approximately 65%, PM_{10}	See the response to comment OR1-17.

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	emissions increase by approximately 99%, and $PM_{2.5}$ emissions increase by approximately 124% for both summer and winter seasons. These updated emission estimates demonstrate that when the RSPA's warehouse emissions are estimated correctly, the Project would result in substantially more severe significant effects than what was previously examined in both the 2010 EIR, as well as the 2016 DSEIR (DSEIR, p. 2- 3). As a result, an updated DSEIR should be prepared that includes an updated model to adequately estimate the Project's operational warehouse emissions, and additional mitigation measures should be incorporated in an effort to reduce the Project's emissions to a less-than-significant level. [19] "Warehouse Truck Trip Study Data Results and Usage," SCAQMD Stakeholder Working Group, July 17, 2014, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/finalswg071714.pdf?sfvrsn=2, p. 15 [20] Kimball Business Park Air Quality Impact Analysis, Urban Crossroads, *available at:*http://www.cityofchino.org/government-services/community-development/environmental-documents	
OR1-39	The DSEIR concludes that the Project would not expose sensitive receptors to substantial pollutant concentrations and therefore would have a less than significant impact, yet fails to actually quantify this risk and compare it to applicable thresholds (p. 4.2-28). The DSEIR attempts to justify the omission of an actual health risk assessment by analyzing construction and operational emissions for the Renaissance Marketplace and Planning Area 108 against the SCAQMD's Localized Significance Thresholds (LST) to determine whether the Project would expose sensitive receptors to substantial pollutant concentrations (p. 4.2-28). Using this method, the DSEIR states that "the localized impact analysis concluded that the Project's emissions would not exceed the SCAQMD's LSTs for any pollutant during construction and/or operational activities" (p. 4.2-28). While the LST method assesses the impacts of pollutants at a local level, it only evaluates impacts from criteria air pollutants. As a result, health impacts from exposure to toxic air contaminants (TACs), such as diesel particulate matter (DPM), were not analyzed, thus leaving a gap within DSEIR's analysis.	A health risk assessment has been added to the Air Quality analysis and the Recirculated DEIR, which was made available for public review and comment from September 26, 2016 to November 10, 2016. This assessment shows that all health risk levels would be below levels of significance.

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	According to the Final Localized Significance Threshold Methodology document prepared by the SCAQMD, the LST analysis is only applicable with NOx, CO, PM_{10}, and $PM_{2.5}$ emissions, which are collectively referred to as criteria air pollutants.[21] Because the LST method can only be applied to criteria air pollutants, this method cannot be used to determine whether emissions from diesel particulate matter (DPM), a known human carcinogen, will result in a significant health risk impact to nearby sensitive receptors. By failing to prepare a health risk assessment in addition to the LST analysis, the DSEIR fails to provide a comprehensive analysis of the sensitive receptor impacts that may occur as a result of exposure to substantial air pollutants. Furthermore, the SCAQMD provides a specific numerical threshold of 10 in one million for determining a project's health risk impact, which supports the requirement of a health risk assessment in addition to the LST analysis. Therefore, the DSEIR should have conducted an assessment that compares both the Renaissance Marketplace and Planning Area 108's health risk to this threshold in order to determine their health risk impact. Not only is the omission of a health risk assessment inconsistent with guidance set forth by the SCAQMD, but it is also inconsistent with requirements set forth by the 2010 DEIR for the previously approved RSP. The 2010 Renaissance Specific Plan DEIR states, "… because of uncertainties in the estimation of the health impacts associated with DPM emissions related to the amount of warehouse development that will ultimately occur in the Project area, as well as the location and proximity of warehouses to residential uses and other sensitive receptors, impacts could be significant without mitigation. Mitigation Measure AQ-14, which required site specific analysis for project level development proposals, is required to ensure that any nearby sensitive receptors are not adversely impacted by the DPM emissions generated by the operation of the Proposed Project" (p. 4.3-36).	

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	Therefore, in an effort to remain consistent with the mitigation requirements set forth by the 2010 DEIR, at the very least the risk associated with Planning Area 108, which proposes to develop multiple warehouses, must also be quantified and compared to the 10 in one million threshold to ensure that any nearby sensitive receptors are not adversely impacted by DPM emissions. By failing to prepare a health risk assessment, the DSEIR is inconsistent with the Renaissance Specific Plan, as well as with recommendations set forth by the SCAQMD. As previously stated in the sections above, the DSEIR failed to provide the CalEEMod output files the Renaissance Marketplace and Planning Area 108 projects. As a result, we are unable to prepare our own, independent health risk assessment. Therefore, an updated DSEIR must be prepared to include a project level health risk assessment that evaluates the risk associated with DPM for the Renaissance Marketplace, Planning Area 108, and any subsequent projects proposed as part of the RSPA. [21] "Final Localized Significance Threshold Methodology." SCAQMD, Revised July 2008, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf	
OR1-40	The DSEIR concludes that the proposed Project would not result in a new significant greenhouse gas (GHG) impact when compared to the previously approved RSP, yet fails to provide valid justification for this conclusion (p. 4.4-12). When we reviewed the DSEIR's greenhouse gas analysis, we found that the proposed RSPA would result in a significant effect that will be substantially more severe than previously shown in the previous EIR, contrary to the conclusion made in the DSEIR. As a result, the significance determination made within the DSEIR is incorrect and unreliable. An updated DSEIR should be prepared to adequately evaluate the RSPA's GHG impact, and additional mitigation measures should be incorporated, where necessary. Table 4.4-2 of the DSEIR shows the GHG emissions from the approved RSP and the currently proposed RSPA (p. 4.4-12).	See the response to comment OR1-19.

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	According to this table, the approved RSP would generate approximately 180,000 metric tons of carbon dioxide equivalents per year (MT CO2e/year), and the RSPA would generate approximately 270,000 MT CO2e/year (see excerpt below) (p. 4.4-12) [see table in Comment Letter OR1]. Taking the net difference in emissions between these two projects, the DSEIR finds that the RSPA will result in an additional 90,000 MT CO2e/year when compared to the Approved 2010 RSP. Using the results of this analysis, the DSEIR concludes that the RSPA would not result in a new significant impact because the approved 2010 RSP already identified a significant GHG impact (p. 4.4-12). This conclusion, however, is incorrect. Even though the RSP already identified a significant GHG impact, the additional emissions that the RSPA would generate still represent a significant effect that will be substantially more severe than previously shown in the 2010 approved EIR. When compared to the RSP's emissions, this increase of 90,000 MT CO2e/year represents a 50% increase from what was previously approved in 2010 (see table below) [see table in Comment Letter OR1]. Furthermore, when the RSPA's emissions are compared to currently established thresholds, we find that these additional emissions, alone, would greatly exceed. For example, the RSPA's emissions of 90,000 MT CO2e/yr would be 30 times greater than the 3,000 MT CO2e/yr threshold recommended by the SCAQMD for mixed-use developments, and would be nine times greater than the highest threshold established by the SCAQMD of 10,000 MT CO2e/yr for industrial facilities.[22 23] Our analysis demonstrates that the RSPA's additional emissions, alone, would greatly exceed established thresholds. Therefore, to simply dismiss these additional emissions as less than significant is absolutely absurd, as it would result in a significant increase in emissions when compared to the previously approved 2010 RSP. An updated DSEIR should be prepared to adequately evaluate the	

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	RSPA's GHG impact, and additional mitigation measures should be incorporated, where necessary. [22] http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2 [23] http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-%28ghg%29-ceqa-significance- thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf?sfvrsn=2	
OR1-41	The DSEIR concludes that the Project's VOC, NOx, CO, PM_{10}, $PM_{2.5}$ and greenhouse gas (GHG) emissions would be significant and unavoidable, yet fails to implement all feasible mitigation measures to the maximum extent possible (p. 1-3). While we agree that the Project would result in a significant individual air quality and GHG impact, we do not agree with the DSEIR's conclusion that these impacts are "significant and unavoidable." An impact can only be labeled as significant and unavoidable after all available, feasible mitigation is considered. According to the CEQA Guidelines and as stated by the San Joaquin Valley Air Quality Management District, "CEQA requires Lead Agencies to mitigate or avoid significant environmental impacts associated with discretionary projects. Environmental documents for projects that have any significant environmental impacts must identify all feasible mitigation measures or alternatives to reduce the impacts below a level of significance. If after the identification of all feasible mitigation measures, a project is still deemed to have significant environmental impacts, the Lead Agency can approve a project, but must adopt a Statement of Overriding Consideration to explain why further mitigation measures are not feasible and why approval of a project with significant unavoidable impacts is warranted." [24] Therefore, an impact can only be labeled as significant and unavoidable after all available, feasible mitigation is considered. Review of the Project's air quality and GHG mitigation measures, however, demonstrates that not all feasible mitigation is being implemented. As a result, additional mitigation measures should be identified and incorporated in order to reduce the Project's individual and cumulative impacts to the maximum extent possible.	See the response to comment OR1-20 for details of the mitigation measures added to the Recirculated DEIR.

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	Until all feasible mitigation is reviewed and incorporated into the Project design, impacts from operational VOC, NOx, CO, PM_{10}, $PM_{2.5}$, and GHG emissions cannot be considered as significant and unavoidable. [24] http://www.valleyair.org/transportation/GAMAQI_3-19-15.pdf, p. 115 of 125	

OR1-42	We identified several additional mitigation measures that the DSEIR and 2010 EIR for the previously approved RSP failed to incorporate, which would further reduce the Project's operational VOC, NOx, CO, PM_{10}, $PM_{2.5}$, and GHG emissions, potentially to a less-than-significant level. Additional mitigation measures that could be implemented include, but are not limited to, the following: [25]
	
	• Use Zero-VOC emission paints;
	  ○ The Project Applicant should consider the use of zero-VOC emission paints, which has been required for numerous projects that have undergone CEQA review. Zero-VOC emission paints are commercially available. Other low-VOC standards should be incorporated into mitigation including use of "super-compliant" paints, which have a VOC standard of less than 10 g/L.
	• Use material that does not require paint;
	  ○ Using materials that do not require painting is a common mitigation measure where VOC emissions are a concern. Interior and exterior surfaces, such as concrete, can be left unpainted.
	• Use spray equipment with greater transfer efficiencies;
	  ○ Various coatings and adhesives are required to be applied by specified methods such as electrostatic spray, high-volume, low-pressure (HVLP) spray, roll coater, flow coater, dip coater, etc. in order to maximize the transfer efficiency. Transfer efficiency is typically defined as the ratio of the weight of coating solids adhering to an object to the total weight of coating solids used in the application process,
		See the response to comment OR1-20.

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	expressed as a percentage. When it comes to spray applications, the rules typically require the use of either electrostatic spray equipment or HVLP spray equipment. The SCAQMD is now able to certify HVLP spray applicators and other application technologies at efficiency rates of 65 percent or greater. [26] • Use passive solar design, such as: [27,28] ○ Orient buildings and incorporate landscaping to maximize passive solar; heating during cool seasons, and minimize solar heat gain during hot seasons; and ○ Enhance natural ventilation by taking advantage of prevailing winds. • Reduce unnecessary outdoor lighting by utilizing design features such as limiting the hours of operation of outdoor lighting. • Develop and follow a "green streets guide" that requires: ○ Use of minimal amounts of concrete and asphalt; ○ Installation of permeable pavement to allow for storm water infiltration; and ○ Use of groundcovers rather than pavement to reduce heat reflection.[29] • Implement Project design features such as: ○ Shade HVAC equipment from direct sunlight; ○ Install high-albedo white thermoplastic polyolefin roof membrane; ○ Install high-efficiency HVAC with hot-gas reheat; ○ Install formaldehyde-free insulation; and ○ Use recycled-content gypsum board. • Provide education on energy efficiency to residents, customers, and/or tenants. Provide information on energy management services for large energy users.	

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	• Meet "reach" goals for building energy efficiency and renewable energy use. • Install solar, wind, and geothermal power systems and solar hot water heaters. • Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on all building roofs and/or on the Project site to generate solar energy for the facility. • Include energy storage where appropriate to optimize renewable energy generation systems and avoid peak energy use. • Plant low-VOC emitting shade trees, e.g., in parking lots to reduce evaporative emissions from parked vehicles. • Use CARB-certified or electric landscaping equipment in project and tenant operations; and introduce electric lawn, and garden equipment exchange program. • Install an infiltration basin to provide an opportunity for 100% of the storm water to infiltrate on-site. [25] http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf [26] http://www.aqmd.gov/home/permits/spray-equipment-transfer-efficiency [27] Santa Barbara Air Pollution Control District, Scope and Content of Air Quality Sections in Environmental Documents, September 1997. [28] Butte County Air Quality Management District, Indirect Source Review Guidelines, March 1997. [29] See Irvine Sustainable Travelways "Green Street" Guidelines; www.ci.irvine.ca.us/civica/filebank/blobdload.asp?BlobID=8934; and Cool Houston Plan; www.harc.edu/Projects/CoolHouston.	
OR1-43	In addition to the measures discussed above, the SCAQMD has previously recommended additional mitigation measures for operational NOx emissions that result primarily from truck activity emissions for similar projects. These measures would also effectively reduce the Project's operational VOC, NOx, CO, PM_{10}, $PM_{2.5}$, and GHG emissions. In this case, these measures would apply to the Project's proposed industrial and commercial land uses.	See the response to comment OR1-20.

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	Measures recommended for the Waterman Logistic Center that are also applicable for this Project include[30]: • Provide electric vehicle charging stations that are accessible for trucks. • Provide electrical hookups at the onsite loading docks and at the truck stops for truckers to plug in any onboard auxiliary equipment. ○ According to Mitigation Measure AQ-12 of the 2010 Approved FEIR, the Project proposes to equip only 10 percent of the loading docks for the warehouse/distribution center uses with these electrical hookups (p. 3-24). However, we require that this measure be extended to all of the loading docks for the warehouse/distribution center uses, as well as all of the loading docks for all of the other proposed land uses, such as the commercial and retail uses. • Require the proposed warehouse to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. • Limit the daily number of trucks allowed at the facility to levels analyzed in the DSEIR and 2010 EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level. • Limit the truck trip miles allowed to levels analyzed in the DSEIR and 2010 EIR. If higher truck trip miles are anticipated or required, the Lead Agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level. • Design the site such that any check-in point for trucks is well inside the facility to ensure that there are no trucks queuing outside of the facility. • On-site equipment should be alternative fueled.	

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	• Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to travel through residential neighborhoods. • Improve traffic flow by signal synchronization. • Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas. • Should the proposed Project generate significant emissions, the Lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in emissions, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts. [30] SCAQMD Comment Letter in Response to MND for the Waterman Logistic Center, January 2018, available at: http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/january/mndwaterman.pdf	
OR1-44	Finally, in addition to the measures described above, the DSEIR proposes to implement the following mitigation measures to reduce operational VOC, NOx, CO, PM_{10}, $PM_{2.5}$, and GHG emissions for the proposed the Renaissance Market Place and Planning Area 108, exclusively (p. 1-7). Therefore, we propose that these mitigation measures also be extended to the entire RSPA in order to reduce emissions to the maximum extent feasible. These mitigation measures include: • Prior to the issuance of building permits, the Project applicant shall submit to the satisfaction of the Public Works Director, evidence that development within the RSPA comply with Title 24 of the California Code of Regulations (CCR) established by the CEC regarding energy conservation and green buildings standards. The Project applicant shall incorporate the following in building plans:	See the response to comment OR1-20.

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	○ Low-emission water heaters shall be used. Solar water heaters are encouraged. ○ Exterior windows shall utilize window treatments for efficient energy conservation (p. 1- 7). • Design all project buildings to meet or exceed the California Building Code's (CBC) Title 24 energy standard, including, but not limited to, any combination of the following: ○ Increase insulation such that heat transfer and thermal bridging is minimized; ○ Limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption; and ○ Incorporate ENERGY STAR or better rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment. • Install efficient lighting and lighting control systems. Use daylight as an integral part of the lighting systems in buildings. • Install "cool" roofs and cool pavements. • Install energy-efficient heating and cooling systems, appliances and equipment, and control systems. • Install solar lights or light-emitting diodes (LEDs) for outdoor lighting or outdoor lighting that meets the City of Rialto City Code. • Install solar photovoltaic or other technology to generate electricity on-site to reduce consumption from the electrical grid. • Install electrical vehicle charging stations to promote the use of electrical vehicles (p. 1-13). These measures are more stringent and prescriptive than those measures identified in the 2010 Approved EIR for the RSP and in the DSEIR for the RSPA. When combined together, these measures offer a cost-effective, feasible way to incorporate lower-emitting design	

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	features into the proposed Project, which subsequently, reduces emissions released during Project operation. An updated DSEIR must be prepared to include additional mitigation measures, as well as include an updated air quality and greenhouse gas analysis to ensure that the necessary mitigation measures are implemented to reduce operational emissions to below thresholds. Furthermore, the Project Applicant needs to demonstrate commitment to the implementation of these measures prior to Project approval, to ensure that the Project's operational emissions are reduced to the maximum extent possible.	
OR1-45	The DSEIR discloses that the Specific Plan Amendment Project would have significant traffic impacts at 27 intersections. It also discloses that the Specific Plan Amendment would cause unsatisfactory level of service on 13 existing or planned roadway segments but does not identify these as significant impacts because the City has no adopted significance thresholds for roadway segments. The DSEIR does, on DSEIR Tables 4.7-20, 4.7-21 and 4.7-22, identify specific improvement measures that would mitigate significant intersection traffic impacts and eliminate unsatisfactory levels of service on roadway segments. However, the DSEIR does not require implementation of these improvements on some specific timely sequence correlated to logical development sequencing. Instead, the actual mitigation measure proposed, TRANS-1, leaves it up to the City Traffic Engineer to review individual site-specific development proposals, determine whether they would cause LOS failures, and determine what of the improvements listed on the above cited tables the individual development would be responsible for either constructing or making monetary contribution toward the cost of construction. This indefinite future mitigation at the discretion of the City Traffic Engineer constitutes a deferral of mitigation that is improper under CEQA.	Impacts and improvements to all intersections and roadway segments have been provided in the EIR and TIA (Table 3-H of TIA). The 13 segments referred to in the comment are within the project area or immediately adjacent to the project area. While the City does not have thresholds to identify impacts to roadway segments, the City's General Plan LOS thresholds have been applied to identify improvements to maintain satisfactory LOS. Improvement costs have been identified and fair shares assigned to the project. It should also be noted that the City is working on a Citywide Fee Program to address transportation needs for the entire City. The comment about implementation of improvements is incorrect. Consistent to the requirements of the GC-66000 and Nexus Studies, implementation of future improvements are generally based on a monitoring program which identifies locations where improvements are needed. This EIR identifies specific improvements, and the future discretion of City Traffic Engineer is merely to identify timing of implementation based on how projects are constructed in the area which will dictate where traffic growth occurs, and thereby, when and where improvements are required.

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OR1-46	With regard to the traffic mitigations required of the Renaissance Marketplace and Planning Area 108 developments, proposed mitigation measures TRANS-2 and TRANS-3 defers definition of explicit traffic mitigation to be provided by these projects to Development Agreements to be entered into by each individual developer and the City. In effect, this transfers definition of mitigation to be provided by the developments from the open public review of this CEQA process to agreements reached in private negotiation between the developer(s) and City officials.	This assertion is incorrect. The City's Transportation Commission has stated that improvements need to be constructed as they are needed.
OR1-47	Appendix H Table 3-F provides current year cost estimates for needed traffic mitigation measures at intersections, a total of $11,200,127. Some improvements are eligible for funding under San Bernardino County Measure I; others are funded by the Rialto Renaissance Fee Program adopted to fund necessary improvements under the original Renaissance Specific Plan. Together, these sources fund $6,122,337 (54 percent) of the entire cost of intersection traffic mitigations. The other $5,669,131 is not included in a funding mechanism, hence uncertain of funding. Of this total, $3,035,648 is reported to be the "fair share" of RSPA development, but the DSEIR fails to propose a method by which these "fair share" funds are to be secured in a manner that results in timely implementation of mitigation. The remaining $2,663,483 is evidently the 'fair share' of other background traffic growth and there is no indication how these funds are going to be made up. The funding situation is even more uncertain for road segment improvements. Road segment improvements are expected to be the responsibility of adjacent development projects. Hence, if a few key sites do not develop for a lengthy period of time, roadways will have irregular geometry and bottleneck sections or disconnects at key places.	The assertion that the funding is uncertain is incorrect. Several of the improvements identified in the TIA are under construction and/or planning. Improvements where the project has a direct impact (for example, at intersections providing access to project parcels) will be constructed by the project. Other impacts are cumulative impacts and the project will pay a fair share and/or fees towards those improvements. It should also be noted that the City is working on a Citywide Fee Program to address transportation needs for the entire City. This fee program will include improvements needed at major intersections, and will address the effects of ambient growth in areas outside the Specific Plan area.
OR1-48	One of the features of the original Renaissance Specific Plan roadway system was the relocation of Renaissance Parkway from its current alignment to an alignment that would intersect Ayala Drive about twice as far south of the intersection of Ayala with the SR 210	Queues at all intersections near the interchanges have been evaluated. Improvements have been recommended to identify required queuing space. The speculation that queues will exceed

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	eastbound ramps as the current location of the intersection of Renaissance with Ayala. The current Project eliminates the proposed southerly relocation of Renaissance, leaving the near limits of the Renaissance-Ayala intersection just 375 feet from the limits of the Ayala – SR 210 eastbound ramps intersection. No apparent analysis of whether the closer spacing of these intersections would result in queue storage problems has been performed. The queuing analysis that was performed in the Appendix H Traffic Impact Analysis was limited to determining locations where dual left turn lanes or dedicated right turn lanes were needed. The sheer traffic volumes projected at these intersections give every reason to expect that queues in the through traffic lanes could block access to the turning lanes or even extend into the upstream intersection. Queue storage deficiencies tend to be hazardous conditions. Hence, the conclusion that the Project would not substantially increase hazards due to a design feature is not substantiated. The DSEIR needs to perform a thorough analysis of queues, considering queues in the thru lanes between these intersections.	storage space and lead to hazards is incorrect. Queues have been reported in the responses to Caltrans comments.
OR1-49	DSEIR Figure 3-4, the PROPOSED RSP Plan Amendment Area, shows the floor area ratio (FAR – the ratio of building floor area square footage to site square footage) within the Planning Areas (PAs) comprising the Town Center at .25. An inset value in a table on the subject figure shows the same value for the Town Center FAR. However, the corresponding figure in the Appendix H Traffic Impact Analysis (Figure 1-2 in that case) shows Town Center PAs 103 and 104 at FAR .23 and PA 101 at FAR .24 with the inset table on the figure displaying these same values. Still more confusing, Table 1-A of Appendix H, which compares the 2010 RSP to the proposed RSPA land use assumptions indicates that Town Center of 72.2 acres would have 715,275 square feet of retail development. This is equivalent to an FAR of only .2274. If developed at FAR .25 as indicated on DSEIR Figure 3-4, Town Center would have a building square footage of 786,258. This discrepancy of 70,983 square feet of retail is equivalent to 3041 daily trips, 263 pm peak hour trips	Figure 3-4 included in the DSEIR is a land use figure. For the Marketplace, detailed site plans have been prepared and based on the Transportation Commission meeting and direction from City staff, the maximum permissible development within the Marketplace (PA 103 and 104) will be restricted to those evaluated in the TIA. The Specific Plan provides guidance on maximum permitted floor area ratios, and the detailed site plan for the Town Center is lower than those listed in the Specific Plan. It should be noted that based on direction from the Transportation Commission if the area of the Town Center increases from what was analyzed in the TIA, the project would have to go back to the Transportation Commission for action.

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	and 68 am peak hour trips at the trip generation rates used in Appendix H. The traffic analysis must be redone with a clear consistency between the maximum floor area permitted under the RSPA and the floor area assumed in the traffic analysis.	
OR1-50	The DSEIR at page 4.7-7 states "As explained below, based on the trip generation, and in consultation with City staff, it was determined that it is unlikely that the RSPA Project would have new circulation impacts outside the Specific Plan study area beyond what was disclosed as part of the Renaissance Specific Plan TIA and Final EIR because the project generates approximately the same number of trips and would have a similar trip distribution as what was previously analyzed in the 2010 Renaissance Specific EIR. Only study intersections and roadways segments within the Specific Plan area would be potentially affected". In short, the notion is that regional effects of the RSPA would remain as disclosed in the 2010 EIR. This conclusion based on the similarity of Project trip generation totals is solely inferential and unsupported by any other evidence. It ignores a critical consideration. The local roadway traffic counts for the 2010 EIR were taken in 2008 or in 2006 and 2007 and factored up to assumed 2008 conditions based on growth rates; the state highway system counts were from 2007. However, in this period of time, SR 210 in the immediate RSP Project area was undergoing reconstruction from a surface highway to a freeway with the north south cross streets being reconstructed as interchanges and overcrossings and much of the surface street infrastructure in both the north- south and east-west directions was discontinuous. Consequently, the traffic baseline conditions against which the Project's regional impacts were measured was of dubious representativeness. As evidence of this, we present the following comparison of Caltrans posted 2007 and 2014 traffic volumes for SR 210 [see table in Comment Letter OR1]. As can be seen in the table, background traffic volumes on SR 210 have increased in the Project area between 2007 and 2014 by between 353 to 900 percent and peak hour volumes have increased between 315 and 748 percent. Given this change in SR 210	The comment incorrectly states traffic volumes for the SR-210 used in the 2010 EIR. Since the SR-210 freeway opened during the time the previous analysis was being conducted, the base year 2007 traffic counts were adjusted. Because SR-210 was not complete in 2007 when the most recent traffic counts were collected, the traffic volumes for the segments on SR-210 between I-15 and I-215 were calculated by taking the ratio of the year 2000 CTP model traffic volumes on SR-210 west of I-15 to those east of I-15, and applying these ratios to the existing (2007) traffic volumes on the segments west of I-15. The resulting traffic volumes used in the baseline analysis are very similar to those in the 2014 counts database. For example, the comment states that the peak hour traffic volume on SR-210 east of Sierra Avenue was 1,150 in 2007. It should be noted that in 2007, the reported volumes are very low for a freeway, and it is possible that the reported volumes are for Highland Avenue (which was considered SR-30 prior to construction of SR-210) instead of the I-210. For example, the comment letter notes that the 2007 traffic volume for the peak hour on the I-210 freeway east of Sierra Avenue was 1,150 and the 2014 traffic volume was 8,600. The 2010 TIA used traffic volumes of 7,110 for 2008 because of the mathematical adjustments discussed above (2014 ground counts reported in the comment is 8,600). Similarly, the 2008 volume for the segment west of I-215 reported in the comment letter was 2,700 whereas the adjusted 2008 volume was 7,162 (2014 ground counts reported in the comment is 8,500). As seen in the above examples, the resulting traffic volumes used in the baseline analysis are very similar to those in the 2014 counts database, especially after accounting for the growth in the region as well as the fact that portions of the RSP have already been constructed.

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	background traffic, even though there may be no meaningful difference in the *amount* of traffic contributed by the RSPA versus the RSP, given the massive change in background traffic on the SR 210, the amount of traffic the RSPA does contribute is clearly likely to have *far more significant consequences* than was RSP traffic measured against the anomalous traffic baseline that was used in the 2010 EIR. In this circumstance, compliance with the good faith effort to disclose impact that CEQA demands logically requires complete analysis of the regional traffic impacts against the current traffic baseline. The DSEIR is deficient for failing to do this.	Please see table below for an evaluation of growth.

	2007 Counts		2014	TIA to	Per Annum
	Comment	2010 TIA	Counts	2014 Change	Growth
East of Sierra Avenue	1,150	7,110	8,600	20.96%	2.99%
West of Riverside Avenue	1,850	7,247	8,600	18.67%	2.67%
East of Riverside Avenue	2,650	7,936	8,400	5.85%	0.84%
West of I-215	2,700	7,162	8,500	18.68%	2.67%

As seen in the above table, the growth rates reported in the comment are erroneous. Further, the above table shows that growth in freeway traffic is consistent or less than those seen in the region (approximately 3% per annum) and evaluated in the EIR. It should also be noted that the 2010 analysis disclosed impacts to the freeway segments at all but 5 segments evaluated. Impacts from the RSPA are anticipated to be similar as similar number of trips are being generated and assigned to the freeway system.

Therefore, the impacts to the freeway system will be similar to those evaluated in the 2010 EIR.

OR1-51	I have had the opportunity to review the comment letter of our associated consultants, SWAPE, regarding the DSEIR's air quality and greenhouse gas analysis assumptions regarding trip generation, heavy truck percentages of trips and truck trip lengths. I can confirm that, as the SWAPE comments point out: • that the trip generation assumptions in the DSEIR's air quality and greenhouse gas analysis are inconsistent with the appropriate Institute of Transportation Engineers *Trip Generation* for Land Use Category 150 (Warehouse) that is proposed on PA 108 and that was relied upon in the DSEIR traffic impact analysis and approved by City traffic consultants and staff. Although this site is identified as a "Business Center" in the	This is a summary comment. See the responses to the individual comments that this comment repeats. In general note that the AQ analysis has been updated in response to the SWAPE comments. Additionally, all feasible mitigation measures to reduce project emissions have also been added to the Recirculated DEIR. This was all included in the updated AQ Report and in the Recirculated DEIR, which was made available for public review and comment from September 26, 2016 to November 10, 2016.

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	RSPA, that is clearly not the General Light Industrial land use that was assumed in the AQ and GHG analysis. The Warehouse category is the most appropriate as is evidenced in DSEIR Figure 3-6 and the related narrative text on page 3-8 and also in DSEIR sections 4.7 and Appendix H. • The heavy truck traffic proportions of the PA 108 trip generation should be, as pointed out by SWAPE, consistent with the guidance of SCAQMD which is also consistent with the guidance of the City of Rialto "*Traffic Impact Analysis Report Guideline and Requirements*" dated December, 2013 and the assumptions of the Appendix H Traffic Impact Analysis. These provisions assume that 40 percent of the traffic to a Category 150 Warehouse are heavy trucks, with 70 percent of the trucks being 4+ axle trucks, 28 percent 3-axle and 2 percent being 2-axle. • The trip length guidance provided by SCAQMD is more logical and analysis based than the Project-favorable assumptions of the AQ/GHG study. The DSEIR simply cannot have it two inconsistent ways, with the traffic study assumptions, that are more readily understood by the public, more conservative in keeping with the good faith effort to disclose impact that CEQA demands and the assumptions of the AQ/GHG analysis about the same considerations more radically favorable to the Project and inconsistent with authoritative guidance. This inconsistency renders the AQ/GHG analysis critically flawed as described in detail in the SWAPE report.	
General Public		
John Wang: October 5, 2016		
GP1-1	In reply to The Recirculated DSEIR that is now being made available to the public for the Renaissance Specific Plan (SCH #2006071021) I once again write as a concerned property owner.	The City acknowledges and appreciates this comment. Detailed responses are provided for the each of the comments provided in this letter.

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GP1-2	I believe the proposed revisions to the Renaissance Specific Plan Amendment will be detrimental to my interests as a land owner and a business operator within the City of Rialto. The new plan contemplates a zoning change to my property from industrial zoning into a public park. This will deny me the opportunity to develop my site (APN 0264211150000) and expand a business that I have established and successfully operated in the city for these past dozen years.	The Final EIR has been revised to include a Land Use plan that shows a Park Overlay Zone over these parcel. The Park Overlay Zone would allow uses permitted under the existing zone to continue. Future development not allowed by right under the existing zone would be required to comply with the zoning requirements established by the Park Overlay zone. The revised land use designations for the Renaissance Specific Plan Amendment, including an updated Land Use Map and text revisions, are included in Section 3, Errata, of the Final SEIR.
GP1-3	Moreover, the zone change will potentially expose the northern border of my current business operation (ABLE Storage) to increased instances of vandalism and graffiti. I am also concerned that the land uses contemplated by the specific plan amendment may result in changes to drainage that will carry more water to my buildings, and potentially damage goods stored by my customers.	The analysis in the EIR evaluates the potential impacts of the project on the physical environment. Issues such as vandalism and graffiti are considered social and economic issues and are not required to be addressed in the SEIR under the California Environmental Quality Act (CEQA). However, this comment will be included in the Final SEIR as part of the response to comments and will be provided to the City of Rialto decision-making bodies for their review and consideration. With regard to drainage, potential drainage impacts are discussed in Section 4.5 of the Recirculated Draft SEIR. Any development on the site, including mass grading in preparation for development, is required to control surface water runoff. The Renaissance Specific Plan Area has a master Storm Drainage Plan that has been reviewed and approved by the City of Rialto to ensure the proper management of surface water runoff and quality. Furthermore, each individual development with the Specific Plan area must include onsite storm drainage facilities and shall be sized according to a required Water Quality Management Plan that will control and treat urban runoff from the project area. In the interim, detention basins located within specific plan area will be developed to collect surface water from proposed development until adequate storm drain facilities have been constructed as the Specific Plan area is developed. Implementation of the mitigation measures identified in the 2010 RSP EIR (and listed in Section 4.5.5.4, of the Recirculated Draft SEIR) would reduce impacts related to stormwater runoff to less than significant.

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GP1-4	I've written about this matter in 2015, but have not received a response from the City. I see from the notice that the City will now respond to all comments submitted on the Recirculated Draft SEIR, so I therefore eagerly await your reply.	Thank you for your comment, please see the responses above and related clarifications in Section 3, *Errata,* of this Final SEIR.

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Table A - Bi-Directional SBTAM Model Volumes Comparison

SR-210 Freeway Segment	2012 SBTAM				Proposed SBTAM				Base Year	Future Year
	2008	2035	Growth	Growth%	2012	2040	Growth	Growth%	Change	Change
1 . West of Sierra Avenue	140,526	181,770	41,244	29.3%	145,845	180,383	34,538	23.7%	5,319	-1,387
2 . Between Sierra Avenue and Alder Avenue	142,417	188,112	45,695	32.1%	149,935	185,343	35,408	23.6%	7,518	-2,769
3 . Between Alder Avenue & Ayala Drive	138,640	183,640	45,000	32.5%	146,464	180,309	33,845	23.1%	7,824	-3,331
4 . Between Ayala Drive and Riverside Avenue	134,197	184,864	50,667	37.8%	141,559	181,178	39,619	28.0%	7,362	-3,686
5 . East of Riverside Avenue	134,859	193,666	58,807	43.6%	151,117	188,691	37,574	24.9%	16,258	-4,975

Notes:
SBTAM = San Bernardino Traffic Analysis Model

Table B - Existing Daily Truck Traffic Flows

	Existing (2015) Daily Truck Volumes	% of Total Daily Traffic
1 . Casmalia Street east of Alder Avenue	1,270	12.5%
2 . Casmalia Street east of Locust Avenue	441	10.5%
3 . Casmalia Street west of Ayala Drive	259	6.2%
4 . Renaissance Parkway west of Alder Avenue	211	6.7%
5 . Renaissance Parkway east of Alder Avenue	430	12.8%
6 . Renaissance Parkway between Locust Avenue and Linden Avenue	202	8.6%
7 . Renaissance Parkway west of Ayala Drive	344	9.7%
8 . Renaissance Parkway east of Ayala Drive	167	2.9%
9 . Baseline Road west of Alder Avenue	417	3.9%
10 . Baseline Road east of Alder Avenue	602	4.2%
11 . Baseline Road west of Linden Avenue	791	7.2%
12 . Baseline Road between Linden Avenue and Ayala Drive	951	7.4%
13 . Baseline Road east of Ayala Drive	694	5.8%
14 . Alder Avenue south of Casmalia Street	3,473	26.3%
15 . Alder Avenue between SR-210 Ramps	1,809	13.0%
16 . Alder Avenue north of Renaissance Parkway	1,909	11.4%
17 . Alder Avenue between Renaissance Parkway and Walnut Avenue	1,136	7.3%
18 . Alder Avenue between Walnut Avenue and Baseline Road	845	5.9%
19 . Ayala Drive south of Casmalia Street	996	7.0%
20 . Ayala Drive between SR 210-Ramps	1,428	8.0%
21 . Ayala Drive north of Renaissance Parkway	1,651	7.2%
22 . Ayala Drive between Renaissance Parkway and Leiske Drive	1,311	6.2%
23 . Ayala Drive between Baseline Road and Fitzgerald Avenue	1,220	6.6%

Table C - Year 2035 Peak Hour Queues

Scenario	AM Peak Hour Queue (ft.)	PM Peak Hour Queue (ft.)	Number of Lanes	Storage Pocket Length (ft.)[1]	Worst Case Queue (ft.)
2035 With RSPA With Recommended Improvements					
2 . Alder Ave/SR-210 Westbound Ramps					
Northbound Left	229	317	2	320	317
Northbound Through	158	25	2	530	158
Southbound Right	25	110	1.5	410	110
Southbound Through	123	507	1.5	410	507
Westbound Left	361	279	2	410	361
Westbound Thru-Right	292	42	1	410	292
3 . Alder Ave/SR-210 Eastbound Ramps					
Northbound Through	462	278	2	370	462
Northbound Right	77	81	1	370	81
Southbound Left	75	216	1	210	216
Southbound Through	28	182	2	530	182
Eastbound Left	667	483	1	415	667
Eastbound Left-Thru-Right	653	426	1	415	653
Eastbound Right	570	384	1	415	570
2035 With RSPA With Recommended Improvements With Modified Improvements					
2 . Alder Ave/SR-210 Westbound Ramps					
Northbound Left	231	316	2	320	316
Northbound Through	158	25	2	530	158
Southbound Right	25	115	1.5	410	115
Southbound Through	107	507	1.5	410	507
Westbound Left	361	279	2	410	361
Westbound Thru-Right	292	42	1	410	292
3 . Alder Ave/SR-210 Eastbound Ramps					
Northbound Through	478	278	2	370	478
Northbound Right	103	81	1	370	103
Southbound Left	38	97	2	210	97
Southbound Through	28	182	2	530	182
Eastbound Left	667	483	1	415	667
Eastbound Left-Thru-Right	653	426	1	415	653
Eastbound Right	570	384	1	415	570

Notes:

Queue Length = 95th percentile queue

ft. = feet

[1] The storage lengths at freeway ramps indicate the length of the striped ramp storage. Additional storage space is available from the end of the ramp striping to the SR-210 mainline. As such, a minimum stacking distance of 1,500 feet is available at all off-ramps.

3 ERRATA

The following are revisions to the Recirculated Draft Subsequent Environmental Impact Report (EIR). These revisions are minor modifications and clarifications and do not change the significance of any of the environmental issue conclusions within the Recirculated Draft SEIR. The revisions are listed by page number. Recirculated Draft SEIR text that is shown underneath explanatory information. All additions to the text are underlined (underlined) and all deletions from the text are stricken (~~stricken~~).

3.1 REVISIONS OR ADDITIONS TO THE TEXT OF THE RECIRCULATED DRAFT SEIR

Chapter 1 Executive Summary

Table 1-1: Executive Summary Matrix, beginning on Page 1-7, is hereby amended to add additional air quality mitigation measures as follows:

EIR Section-Thresholds	Summary of Mitigation Measures	Level of Significance After Mitigation
Violate any air quality standard or contribute substantially to an existing or projected air quality violation.	**AQ-6: Truck Building Access** Prior to the issuance of any grading permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the following truck access routes have been incorporated into the project design, to the maximum extent practicable, to reduce air quality and potential future health risk impacts from the operation phases of the proposed project: • Design warehouse/distribution centers such that entrances and exits discourage that trucks from traversing past neighbors or other sensitive receptors. • Design warehouse/distribution centers such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility. • Establish area(s) within the facility for repair needs.	Less than significant

EIR Section-Thresholds	Summary of Mitigation Measures	Level of Significance After Mitigation
Violate any air quality standard or contribute substantially to an existing or projected air quality violation.	• Provide electrical service capacity for equipment at facilities. **AQ-7: Truck Routes** Prior to the issuance of any grading permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the following truck access routes have been incorporated into the project design, to the maximum extent practicable, to reduce air quality and potential future health risk impacts from the operation phase of the proposed project, if feasible: • Develop, adopt and enforce truck routes both for entering and leaving the city and in and out of facilities; keeping in mind common pedestrian routes, especially for schools. • Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas. • Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride. • Where there are traffic impacts, improve traffic flow by signal synchronization. **AQ-8: Super-Compliant VOC Paints** Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the construction contractor shall be required to utilize Super-Compliant VOC paints, which are defined by SCAQMD as meeting the "super-compliant" VOC standard of 10 grams per liter (g/L). Use of HVLP or electrostatic spray equipment shall be encouraged. **AQ-9: Exterior and Interior Finishes** Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning	Less than significant

EIR Section-Thresholds	Summary of Mitigation Measures	Level of Significance After Mitigation
Violate any air quality standard or contribute substantially to an existing or projected air quality violation.	Division, evidence that exterior and interior finishes that do not require painting shall be used where feasible. **AQ-10: Building Orientation** Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that buildings have been oriented and incorporate landscaping to maximize passive solar; heating during cool seasons, and minimize solar heat gain during hot seasons where feasible depending upon site condition and topography. **AQ-11: Title 24 Standards** Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the building design has met the requirements of 2016 Title 24 standards for building and site efficiency to reduce energy and water usage. **AQ-12: Energy Efficiency Education** Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that building tenants shall be encouraged to educate employees on energy efficiency measures. **AQ-13: Preferential Parking Spaces** Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that preferential parking spaces shall be offered to car pools and van pools. **AQ-14: Electrical Hookup Capacity** Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning	Less than significant

EIR Section-Thresholds	Summary of Mitigation Measures	Level of Significance After Mitigation
	Division, evidence that building designs provide electrical capacity for installation of electrical hookups at onsite loading docks and for electric vehicle charging stations. **AQ-15: Warehouse Employee Amenities** Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that warehouse and industrial buildings that exceed 500,000 square feet provide on-site food vending machines, refrigerator, and microwave for project employees.	

Chapter 3 Project Description

Table 3-2: Change in Acreage by Land Use (2010 Approved Versus 2016 Revisions), on page 3-10, has been amended as follows:

Table 3–2 Change in Acreage by Land Use (2010 Approved Versus 2016 Revisions)

	2010 Plan	2016 Plan	Change
Residential	**149.5**	**107.0**	**(42.5)**
Low	61.9	50.5	(11.4)
Medium	25.8	29.0	3.2
Medium High	56.8	19.5	(37.3)
High	5.0	8.0	3.0
Non Residential[1]	**935.1**	**991.2**	**56.1**
Retail	109.7	116.7	7.0
Commercial	46.3	43.0	(3.3)
Office	25.5	26.7	1.2
Industrial	753.6	804.8 ~~804.9~~	51.2 ~~51.3~~
Public Spaces	**376.5**	**352.5 ~~352.4~~**	**(24.0) ~~(24.1)~~**
Private Rec Center	4.1	2.5	(1.6)
Public Parks [1]	41.9	45.9	4.0
Buffer/Easements	4.6	4.8	0.2
Utilities	11.5	13.0 ~~12.9~~	1.5 ~~1.4~~
Schools	15.0	13.0	(2.0)
ROW	299.4	273.3	(26.1)
Totals	**1,461.1**	**1,450.7 ~~1,450.6~~**	**(10.4) ~~(10.5)~~**

Note:

[1] Planning Area 133 may develop under the Employment or Public Park land use categories. For the purposes of estimating the buildout, it has been calculated as though this area will develop as Public Park.

Table 3-3: Change in Units/BSF by Land Use (2010 Approved Versus 2016 Revisions), on page 3-10, has been amended as follows:

Table 3–3 Change in Units/BSF by Land Use (2010 Approved Versus 2016 Revisions)

	2010 Plan	2016 Plan	Change
Residential	**1,667**	**1,279**	**(388)**
Low	446	404	(42)
Medium	290	363	73
Medium High	818	312	(506)
High	113	200	87
Non Residential[1]	**15,406,301**	**17,482,089 ~~17,484,283~~**	**2,075,788 ~~2,077,982~~**
Retail	1,155,429	1,244,367	88,938
Commercial	687,377	616,921	(70,456)
Office	833,085	872,292	39,207
Industrial	12,730,410	14,748,509 ~~14,750,703~~	2,018,099 ~~2,020,293~~
Performance Metrics			
Population	5,168	3,964	(1,204)
Employment[1]	14,468	11,578	(2,890)
Jobs/Housing Unit	8.68	9.05	0.37
Housing Units/Acre	11.2	12.0	0.80
Non-Residential FAR	0.38	0.40	0.02
Park Ratio (New Public Parks)[1]	3.1	5.0	1.90

Note:

[1] Planning Area 133 may develop under the Employment or Public Park land use categories. For the purposes of estimating the buildout, it has been calculated as though this area will develop as Public Park.

Figure 3-4: Proposed RSP Plan Amendment Area, on page 3-13 of the Recirculated Draft SEIR is hereby amended as shown on the following page to include:

- Planning Area 108b which consists of 0.1 ac of land designated as Utilities/Public Facilities

Chapter 4.2 Air Quality

Air Quality Mitigation Measures beginning on page 4.2-34 are revised to add the following mitigation measures:

Mitigation Measure AQ-6: Truck Building Access

Prior to the issuance of any grading permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the following truck access routes have been incorporated into the project design, to the maximum extent practicable, to reduce air quality and potential future health risk impacts from the operation phases of the proposed project:

- Design warehouse/distribution centers such that entrances and exits discourage that trucks from traversing past neighbors or other sensitive receptors.

- Design warehouse/distribution centers such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility.
- Establish area(s) within the facility for repair needs.
- Provide electrical service capacity for equipment at facilities.

Mitigation Measure AQ-7: Truck Routes

Prior to the issuance of any grading permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the following truck access routes have been incorporated into the project design, to the maximum extent practicable, to reduce air quality and potential future health risk impacts from the operation phase of the proposed project, if feasible:

- Develop, adopt and enforce truck routes both for entering and leaving the city and in and out of facilities; keeping in mind common pedestrian routes, especially for schools.
- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas.
- Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride.
- Where there are traffic impacts, improve traffic flow by signal synchronization.

Mitigation Measure AQ-8: Super-Compliant VOC Paints

Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the construction contractor shall be required to utilize Super-Compliant VOC paints, which are defined by SCAQMD as meeting the "super-compliant" VOC standard of 10 grams per liter (g/L). Use of HVLP or electrostatic spray equipment shall be encouraged.

Mitigation Measure AQ-9: Exterior and Interior Finishes

Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that exterior and interior finishes that do not require painting shall be used where feasible.

Mitigation Measure AQ-10: Building Orientation

Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that buildings have been oriented and incorporate landscaping to maximize passive solar; heating during cool seasons, and minimize solar heat gain during hot seasons where feasible depending upon site condition and topography.

Mitigation Measure AQ-11: Title 24 Standards

Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the building design has met the requirements of 2016 Title 24 standards for building and site efficiency to reduce energy and water usage.

Mitigation Measure AQ-12: Energy Efficiency Education

Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that building tenants shall be encouraged to educate employees on energy efficiency measures.

Mitigation Measure AQ-13: Preferential Parking Spaces

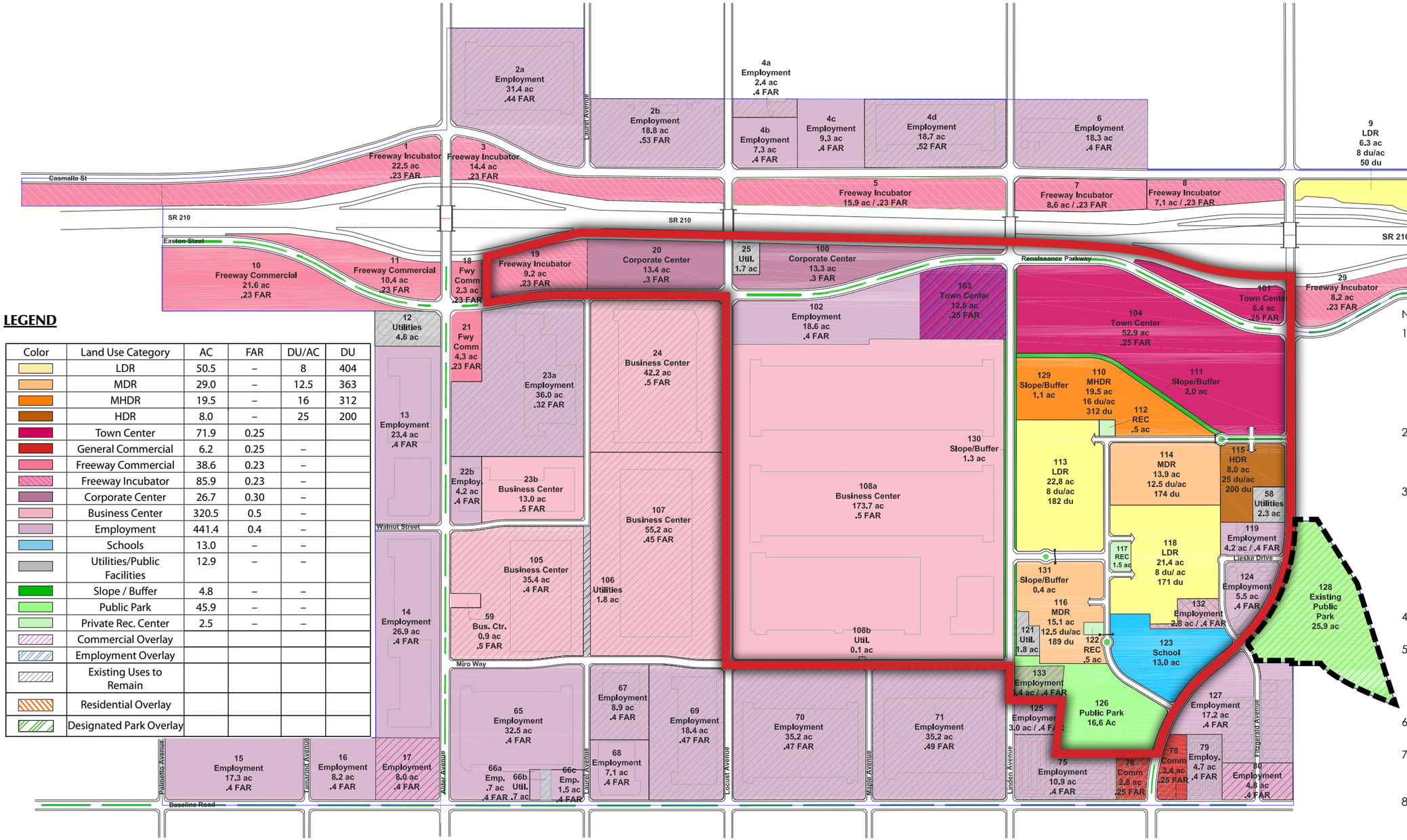
Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that preferential parking spaces shall be offered to car pools and van pools.

Mitigation Measure AQ-14: Electrical Hookup Capacity

Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that building designs provide electrical capacity for installation of electrical hookups at onsite loading docks and for electric vehicle charging stations.

Mitigation Measure AQ-15: Warehouse Employee Amenities

Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that warehouse and industrial buildings that exceed 500,000 square feet provide on-site food vending machines, refrigerator, and microwave for project employees.



LEGEND

Color	Land Use Category	AC	FAR	DU/AC	DU
	LDR	50.5	–	8	404
	MDR	29.0	–	12.5	363
	MHDR	19.5	–	16	312
	HDR	8.0	–	25	200
	Town Center	71.9	0.25		
	General Commercial	6.2	0.25	–	
	Freeway Commercial	38.6	0.23	–	
	Freeway Incubator	85.9	0.23	–	
	Corporate Center	26.7	0.30	–	
	Business Center	320.5	0.5	–	
	Employment	441.4	0.4	–	
	Schools	13.0	–	–	
	Utilities/Public Facilities	12.9	–	–	
	Slope / Buffer	4.8	–	–	
	Public Park	45.9	–	–	
	Private Rec. Center	2.5	–	–	
	Commercial Overlay				
	Employment Overlay				
	Existing Uses to Remain				
	Residential Overlay				
	Designated Park Overlay				

NOTES:

1. The boundaries of the land use designations are approximate and generally follow streets and property lines. Minor changes in boundary alignment and location are permissible as described in Section 6, Implementation.
2. The transfer of residential units and square footage in the Business Center land use categories is allowed as described in Section 6, Implementation.
3. If the school is relocated or if the school district chooses not to develop a school within Renaissance, then the underlying land use shall revert to the Medium High Density Residential (MHDR) land use designation and can accept the transfer of residential units from other areas of the Specific Plan, as described in Section 6, Implementation.
4. See city zoning code for non-conforming uses.
5. PA 132 will remain as an Employment Area with the option to become Low Density Residential. As Low Density Residential it will be calculated at 8 du/ac for a total of 23 dwelling units.
6. Existing uses noted based on approved square footage and FAR.
7. Shared drive approach at PA 19 and 20 is recommended at laurel Avenue intersection.
8. PA 103 has the land use designation of Town Center, and it was analyzed under the ITE land use classification, "General Commercial" for traffic analysis purposes. Subsequent analysis is required if Employment Overlay is implemented.

Project Area/RSP Amendment Area

Existing Jerry Eaves Park to Remain

Source: Placeworks, 2016

Figure 3-4: Proposed RSP Plan Amendment Area

Kimley»Horn

Appendix A

Comment Letters Received on the Recirculated Draft SEIR

DEPARTMENT OF TRANSPORTATION
DISTRICT 8
PLANNING (MS 725)
464 WEST 4th STREET, 6th FLOOR
SAN BERNARDINO, CA 92401-1400
PHONE (909) 388-7017
FAX (909) 383-5936
TTY 711
www.dot.ca.gov/dist8

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By

Serious Drought.
Help save water!

SA1

October 27, 2016

File: 08-SBd-210-PM 16.04/17.68

Gina Gibson
Planning Manager
City of Rialto
150 South Palm Avenue
Rialto, CA 92376

Renaissance Specific Plan – Draft Environmental Impact Report Traffic Memo and Traffic Impact Analysis

Ms. Gibson,

Thank you for providing the California Department of Transportation (Caltrans) the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) Traffic Memo and Traffic Analysis for the City of Rialto Renaissance Specific Plan Amendment (RSPA). The project is primarily located south of State Route 210 (SR-210) and Casmalia Street, north of Base Line Road, west of Ayala Drive, and east of Locust Avenue, in the City of Rialto. The RSPA would amend the previously approved specific plan add the Renaissance Marketplace, a 612,285 thousand square foot retail center, and Planning Area 108, comprised of 4 million square feet of industrial/warehouse uses. Project land uses include 446 low density residential units, 290 medium density residential units, 818 medium high density residential units, and 113 high density residential units; a 612,285 square foot Town Center; 833,085 square feet of Corporate Center; 516,186 square feet of Freeway Commercial uses; 6,033,931 square feet of Employment; 1,374 square feet of Freeway Incubator; 23,958 square feet of General Commercial; a 15 acre school, 19.3 acres of parks and other green spaces.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans through the lenses of our mission and state planning priorities of infill, conservation, and travel-efficient development. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy, and build communities, not sprawl. As of September 2016, our unit's focus will be towards reducing Vehicle Miles Traveled (VMT) associated with local development projects per SB 743. We therefore provide the following comments reflecting smart growth principles and VMT reduction in relation to the RSPA:

Smart Growth Principles

Caltrans supports infill and smart growth development. Based on its place-type, design characteristics, potential impacts, and proposed mitigations, the Department feels that this project is not representative of the smart growth principles and the state's goals with smart-growth land-use changes and multi-modal transportation planning and funding.

SA1-1 This project will likely negatively impact air quality and public health in the region due to land uses necessitating the growth of trucking. We question the land use compatibility of locating housing in such close proximity to warehousing and recommend the use of public park space along Linden Avenue and other major corridors to act as a buffer to mitigate negative air quality impacts. We are, however, in support of several greenhouse gas reduction mitigation measures, which include:

- The use of green building materials.
- Utilizing energy efficiency measures such as efficient lighting, windows, heating and cooling, insulation, and cool roofs.
- The installation of solar photovoltaic panels and electric vehicle charging stations.
- The use of water efficient landscapes, irrigation and the use of reclaimed water.
- Provision of bicycle racks in convenient locations.

SA1-2 We recommend the City review the project area land uses to identify locations where bicycle and pedestrian paths, high-density housing, high-quality transit, and mixed-use land uses centered around transit can be accommodated. We would encourage the City to consider amending the Specific Plan to allow for mixed-uses within high density residential, medium high density residential, Town Center and Corporate Center uses. Mixed land uses and increased densities have been found to be successful in reducing VMT significantly, even in suburban locations. Providing housing in close proximity to jobs, retail and multi-modal transportation would satisfy the Smart Mobility principles of Location Efficiency and Reliable Mobility, as discussed in the Executive Summary of the Smart Mobility Framework[i].

SA1-3 Freeway Commercial and Freeway Incubator uses, although integrated with the transportation system currently in place, will lead to increased VMT due to their regional shopping and automobile orientation. Despite the suggestion of creating a pedestrian-friendly environment, the site plan for the Town Center exemplifies the traditional power center design that is not pedestrian-friendly due the number of parking stalls required- around 1,500 more than required- and the distance between certain pads and major stores within the Center. By reducing parking and incentivizing bicycle and pedestrian travel by integrating the shops to paths and the street, VMT can be reduced and livability can be increased. A reduction in parking can also reduce the distance between shops, making it more

[i] http://www.dot.ca.gov/hq/tpp/offices/ocp/documents/smf_files/SMF_handbook_062210.pdf

pedestrian-friendly. Further, integrating shops around a high-quality transit station[ii] can mitigate the need for parking as well as VMT. We also encourage the use of solar photovaultaic shade structures in the Town Center parking lots to provide pedestrian-friendly shading and environmentally-friendly electricity generation for businesses and electric vehicle. **SA1-3 Cont.**

Multimodal Accessibility

Caltrans is committed to ensuring that a multimodal transportation system serves every local development project. Planning facilities and policies for pedestrians, cyclists, transit riders and travel demand management will encourage more multimodal trips. As a result, by offering these measures, projects can reduce congestion, VMT, greenhouse gas emissions, and our State's effect on climate change. **SA1-4**

Referring to the City of Rialto General Plan Circulation Chapter, Exhibits 4.2- Transit and Rail Routes, and 4.4- Bicycle Routes, do not reflect the needs of a multi-modal circulation system within the Specific Plan area. We therefore offer suggestions on bicycle and transit routes below, in addition to further pedestrian safety and travel demand management policies and programs. A multi-modal transportation system is integral to the livability and accessibility of future residents, customers and employees within the Specific Plan area. We therefore support the following City of Rialto General Plan goals and policies: **SA1-5**

- Policy 2-35,2: Require that new development projects incorporate design features that encourage ridesharing, transit use, park and ride facilities, and bicycle and pedestrian circulation.
- Policy 2-38.3: Provide enhanced bicycle and walking infrastructure, and support public transit, including public bus service, the Metrolink, and the potential for Bus Rapid Transit (BRT).
- Goal 4-6: Provide for all residents and businesses to have equal access to reliable and convenient public transit services [and all Policies therein].
- Goal 4-8: Establish and maintain a comprehensive system of pedestrians and bicycle routes that provide viable connections throughout the City [and all Policies therein].
- Goal 4-9: Promote walking [and all Policies therein].

Given the aforementioned State and Local policies, the *Rialto Renaissance Fee Program* should be reviewed to include multi-modal transportation funding at both intersections and within roadway segments. In its current form it could potentially fund bicycle, pedestrian and transit-oriented improvements at intersections. Including a multi-modal fee program within the Renaissance Specific Plan would provide an opportunity to fund the projects alluded to within the City of Rialto General Plan, which can include bicycle and pedestrian trails, bus facilities, and Bus Rapid Transit systems within the Specific Plan area. We offer the following recommendations pertaining to each mode: **SA1-6**

- Pedestrians- we recommend the following measures to improve pedestrian safety:

[ii] Per SB 743, "a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours".

SA1-6 Cont.

- Striping high-visibility crosswalks at all intersections.
- Constructing curb bulbouts to reduce crossing distance and increase pedestrian safety within the residential, school, park, commercial and town center areas.
- Constructing mid-block crossings with raised median islands at park locations and commercial areas.
- Traffic calming within residential areas.
- Consideration of roundabouts in minor intersections within residential, school and park areas.

SA1-7

- Bicycles- we recommend the following measures to increase bicycle trips and safety:
  - We recommend amending the bikeway designation of 5 foot Class II Bike Lanes to Class IV Separated Bikeways, per Caltrans Design Information Bulletin 89[iii], on several roadway segments within the Specific Plan area. Separated Bikeways have been found to reduce collisions for all road users and greatly increase bicycle trips due to their vertical and horizontal separation from automobiles. At a minimum, the California Highway Design Manual recommends Chapter 300 recommends 6 foot wide bike lanes when posted speeds are greater than 40 MPH. These can be paired with buffers (horizontal separation) and green paint in conflict areas. Class IV vertical separation could include flexible delineator posts, bollards, raised curbs, parked vehicles, and raised bike lanes. Class IV Separated Bike Lanes can also be two-directional. We recommend these amendments to Class IV Separated Bikeways standards on the following roadways:
    - Renaissance Parkway (referring to Figure 3-2a)- this is recommended along the entire segment of Renaissance Parkway within the Specific Plan area, but would be effective if implemented at a minimum between Linden Avenue and Ayala Drive. This would provide a safe connection between the residential communities, the Town Center, and employment.
    - Alder Avenue (referring to Figure 3-3)- this consideration would separate cyclists from truck traffic.
    - Baseline Road (referring to Figure 3-4)- this would connect residents, park-goers, and employees with employment uses.
    - Ayala Drive (referring to Figure 3-5)- this would connect residents and students to the school, park, Town Center, and employment.
    - Casmalia Street (referring to Figure 3-6)- this would separate cyclists from primarily automobile-oriented Employment and Freeway Incubator uses.

SA1-8

- Referring to Figure 3-2b Modified Renaissance Parkway at Ayala Intersection- we recommend consideration of upgrading the intersection to a protected intersection for cyclists and pedestrians. Design guidance for protected intersections is discussed in DIB 89.

SA1-9

- Referring to Figure 3-7 Secondary Arterial (Miro Street and Locust Avenue), 8 foot wide Class II Bike Lanes are supported. In addition, we recommend the consideration of horizontal buffers between the bike lanes and automobile traffic and green paint in conflict areas.

[iii] http://www.dot.ca.gov/hq/oppd/dib/dib89.pdf

- Referring to Figure 3-8 Secondary Arterial (Linden Avenue), we recommend the meandering sidewalk on the East of the roadway be amended to Class I Multi-Use Path standards to provide off-road bicycle and pedestrian access. We recommend it be constructed in a direct path to provide an efficient transportation facility for cyclists and pedestrians. **SA1-10**
- Referring to Figure 3-9 Residential Collector (Typical), we recommend certain streets be designated as Bicycle Boulevards[iv] which may include shared lane markings, signage, safe and convenient major and minor street crossings, roundabouts, traffic calming, and green infrastructure. **SA1-11**
- Referring to Figure 3-11 Local (Typical), we recommend prospective applicants utilize innovative design strategies outlined in the National Association of City Transportation Officials' Urban Street Design Guide. Refer to the guidelines provided for the "Neighborhood Street", "Yield Street", "Green Alley", and "Residential Shared Street" designations. **SA1-12**
- There is an apparent lack of east-west connections within the section of the Specific Plan area that is south of SR-210, especially for cyclists and pedestrians. We therefore recommend construction of a Class I Multi-Use Path along the slope/buffer south of the Town Center and traveling west through the business center to connect to Class II Bike Lanes on Locust Avenue. Further, we recommend construction of another Class I Multi-Use Path south of the 42.2 acre Business Center and 36 acre Employment site that are planned South of Renaissance Parkway. **SA1-13**
- We recommend the consideration of a citywide bikeshare system to provide affordable active transportation options for residents, employees, students, etc. to access jobs, school, housing, retail, parks. **SA1-14**
- Prospective employers should provide bicycle commute subsidies, including per-mile subsidies and bikeshare passes, to increase bicycle commuting among employees.

- Transit- we recommend the following measures to increase transit usage:
  - Prospective employers and the City should meet with Omnitrans to discuss providing transit passes or subsidies to employees.
  - The City should meet with Omnitrans to discuss bus route modifications, frequency and efficiency upgrades to service the new housing, retail and employment opportunities. With the Renaissance Specific Plan, bus routes are necessary along all major arterials, including Alder Avenue, Laurel Avenue, Locust Avenue, Linden Avenue, Ayala Drive, Casmalia Street, Renaissance Parkway, and Baseline Road. Currently, there are two bus routes servicing Rialto, including Routes 15, an east-west route traveling primarily along Rialto Avenue; and 22, a north-south route traveling primarily along Riverside Avenue. These routes could be modified to travel within the Specific Plan area; it is recommended that headways be reduced and bus signal prioritization be planned to provide more high-quality transit options. We offer the following recommendations regarding transit planning: **SA1-15**
    - With High Density Residential providing 25 dwelling units per acre, this designation is supportive of high quality Bus Rapid Transit (BRT). We recommend

[iv] http://nacto.org/publication/urban-bikeway-design-guide/bicycle-boulevards/

SA1-15 Cont.

consideration of a new BRT route along Ayala Drive to connect housing to employment, retail and schools and the proposed BRT line along Foothill Boulevard (referring to Omnitrans' System-Wide Transit Corridor Plan for the San Bernardino Valley). As the residential densities for medium high density residential and medium density residential along Linden Avenue are also supportive of BRT, Linden Avenue can be chosen as an alternative to Ayala Drive.

- We recommend consideration of BRT along Baseline Road, to connect employment to the public transportation system that is recommended above. This could branch west from the proposed BRT line along Riverside Avenue (referring to Omnitrans' System-Wide Transit Corridor Plan for the San Bernardino Valley). Renaissance Parkway could be considered as an alternative to Baseline Road.
- The creation of a circulator trolley shuttle between employment, retail, housing and BRT stations within the Specific Plan area is recommended.

SA1-16

- Travel Demand Management- we recommend the following strategies at employment sites to decrease VMT:
  - A reduction of single occupant parking, which will help reduce VMT and development costs.
  - The implementation of an Employee Commute Reduction Program per South Coast Air Quality Management District's Rule 2202[v] with preferential parking for carpools, vanpools, car-share and ride-share vehicles.
  - Telecommuting and flexible work schedules.
  - Solar powered shade structures with electric vehicle charging stations.

SA1-17

Traffic Operations and Forecasting

Caltrans' Planning and Operations Divisions review Traffic Impact Analyses to assess analysis, methodology and projected impacts to the State Highway System, and provide recommended mitigation strategies. We have the following comments regarding the Traffic Impact Analysis:

SA1-18

- Referring to section 1.2 Analysis Methodology: show the Analysis Methodology for the project and clearly identify within the entire TIA for Existing, Opening, and Future years.

SA1-19

- Referring to Section 1.3 Traffic Model: show if traffic data for the project area of the San Bernardino Traffic Analysis Model (SBTAM) are consistent with the current model prepared for SANBAG.

SA1-20

- Referring to Figure 1-3 Conceptual Site Plan for Renaissance Marketplace: project access between SR-210 interchange ramp and Renaissance Parkway is still shown. Please verify.

SA1-21

- Referring to Section 2.1.1 Trip Generation (RSPA): discuss whether an Ambient Growth Factor was used in this TIA.

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[v] http://www.aqmd.gov/docs/default-source/rule-book/support-documents/rule-2202/rule-2202-employee-commute-reduction-program-guidelines-(ecrp).pdf?sfvrsn=2

- Referring to Section 2.1.3 Trip Generation Comparison (RSP & RSPA): incorporate a plot and exhibit showing truck restriction routes within and in close proximity to the proposed project site. **SA1-22**
- Referring to Section 3.1 RSPA Analysis Methodology: provide the Ambient Growth Factor and the Project Opening Year. **SA1-23**
- Referring to Section 3.1.1 Volume Development: the TIA states that traffic counts were collected in 2014 to develop existing (2015) traffic volumes, Appendix A is mentioned as the source for more information; however, the count sheets are dated 9/24/2013. Please verify the correct date on which counts were taken. **SA1-24**
- Referring to Section 3.1.1 Volume Development Item 6: include an exhibit showing the numerical values of the existing truck percentages. **SA1-25**
- Referring to Figure 3-1 Existing Intersection Geometrics and Stop Control: correct lane assignments on all of the intersections listed below: **SA1-26**
    - Intersection #9: Laurel Avenue Northbound lane.
    - Intersection #11: Locust Avenue Northbound lane.
    - Intersection #13: Baseline Road Eastbound right turn lane.
    - Intersection #15: Linda Avenue Northbound and Southbound.
- Referring to Table 3-L -RSPA: Year 2035 with RSPA with Recommended Improvements; and Table 3-M –RSPA: Year 2035 with RSPA with Modified Improvements for Queuing Issues: prepare the detail queue and available storage length analyses for all turning movements (Left turn, Right turn, Through) and extend to the proper storage length per the California Highway Design Manual at the following locations: **SA1-27**
    - SR-210 and the Alder Avenue Ramps
    - SR-210 and the Ayala Drive Ramps
- Referring to Section 4.9 Queuing Analysis: conduct Ramp Queuing, Merge/Diverge and Segments Analysis for all state facilities and then state if proposed projects will impact SR-210 mainline and associated ramps. **SA1-28**

All comments should be addressed with a Response to Comments included, and the TIA should be resubmitted prior to proceeding with the Encroachment Permit Process. These recommendations are preliminary and summarize our review of materials provided for our evaluation. Please continue to keep us informed of the project and other future updates, which could potentially increase VMT or decrease safety for road users. If you have any questions or need to contact us, please do not hesitate to contact Dustin Foster at (909) 806-3955 or myself at (909) 383-4557. **SA1-29**

Sincerely,

Mark Roberts

MARK ROBERTS
Office Chief
Intergovernmental Review, Community and Regional Planning

825 East Third Street, San Bernardino, CA 92415-0835 | Phone: 909.387.8109 Fax: 909.387.7876
www.SBCounty.gov

SAN BERNARDINO COUNTY

Department of Public Works
Environmental & Construction • Flood Control
Operations • Solid Waste Management
Surveyor • Transportation

Gerry Newcombe
Director

LA1

November 7, 2016

City of Rialto
Planning Division
Attn: Gina Gibson
150 South Palm Avenue
Rialto, CA. 92376
ggibson@rialtoca.gov

File: 10(ENV)-4.01

RE: NOTICE OF AVAILABILITY OF A RECIRCULATED DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT FOR THE RENAISSANCE SPECIFIC PLAN

Dear Ms. Gibson:

Thank you for giving the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on September 27, 2016** and pursuant to our review, the following comments are provided:

Water Resources Division (Mary Lou Mermilliod, PWE III, 909-387-8213):

1. Prior to outlet of drainage into the San Bernardino County Flood Control District's (District) Cactus Basin, a hydrology study shall be reviewed and approved by the District. **LA1-1**

If you have any questions, please contact the individuals who provided the specific comment, as listed above.

Sincerely,

NIDHAM ARAM ALRAYES, MSCE, PE, QSD/P
Public Works Engineer III
Environmental Management

NAA:PE:sr

BOARD OF SUPERVISORS
Robert A. Lovingood, Vice Chairman, First District | Janice Rutherford, Second District | James Ramos, Chairman, Third District | Curt Hagman, Fourth District | Josie Gonzales, Fifth District
Gregory C. Devereaux, Chief Executive Officer

LA2

RIALTO UNIFIED SCHOOL DISTRICT

BOARD OF EDUCATION

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President

Dina Walker
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Joseph Ayala
Member

Edgar Montes
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Superintendent
Cuauhtémoc Avila, Ed.D.

Associate Superintendent
Business Services
Mohammad Z. Islam

BUSINESS SERVICES

Dr. John R. Kazalunas
Education Center
182 East Walnut Ave.
Rialto, CA 92376-3598

Tel: (909) 820-7700
Extension 2212 or 2213
Fax: (909) 873-2489

October 16, 2016

Gina Gibson, Senior Planner
City of Rialto Planning Department
150 S. Palm
Rialto, CA 92376

RE: RESPONSE TO THE RECIRCULATION OF THE DS EIR

Dear Ms. Gibson:

Thank you for the opportunity to review this plan as the new residential planning areas and portions of the commercial/industrial planning areas lie within the Rialto Unified School District (RUSD) boundary.

NEW RESIDENTIAL HOUSING

Per the Revised Renaissance Specific Plan the 1,279 new residential units within (7) residential planning areas all lie within RUSD boundary. The current breakdown is listed as (404)-LDR, (363)-MDR, (312)-MHDR, and (200)-HDR. Applying the current Student Generation Factor (SGF) Rialto Unified would yield 445 elementary students, 223 middle school students, and 269 high school students for a total of 936 K-12 students entering the RUSD school system. Please see exhibit "Table 3-2". LA2-1

COMMERCIAL/INDUSTRIAL

The school boundary between Fontana and Rialto school districts bisects through the center of the industrial / commercial planning areas. It is estimated that 8,176,725 square feet of commercial / industrial space lie within RUSD. The remaining square footage lies within Fontana Unified School District. Please see exhibit "RUSD Commercial Area". LA2-2

'Table 3-2' from the Renaissance DS EIR indicates a creation of approximately 7,000 jobs from business type uses in the Land Use Plan. 'Table-9' from the most current Developer Fee Justification and Impact Analysis, dated March 2016, applies K-8 student generation factors from 0.15 to .039 per employee from the Commercial Industrial Development. Applying these factors generates roughly over 900 grades K-8 students from these Commercial/Industrial planning areas in the RUSD boundary. This would be in addition to the 668 K-8 students to be generated from the proposed residential planning areas. Total K-8 students to be generated in RUSD from this project would be estimated at over 1,500 students. LA2-3

RECIRCULATION

Please note 'Table 3-2' and 'Table 3-3' of the Recirculation DS EIR confirms these statistics and calculations as 2016 Revisions. LA2-4

Best Regards,

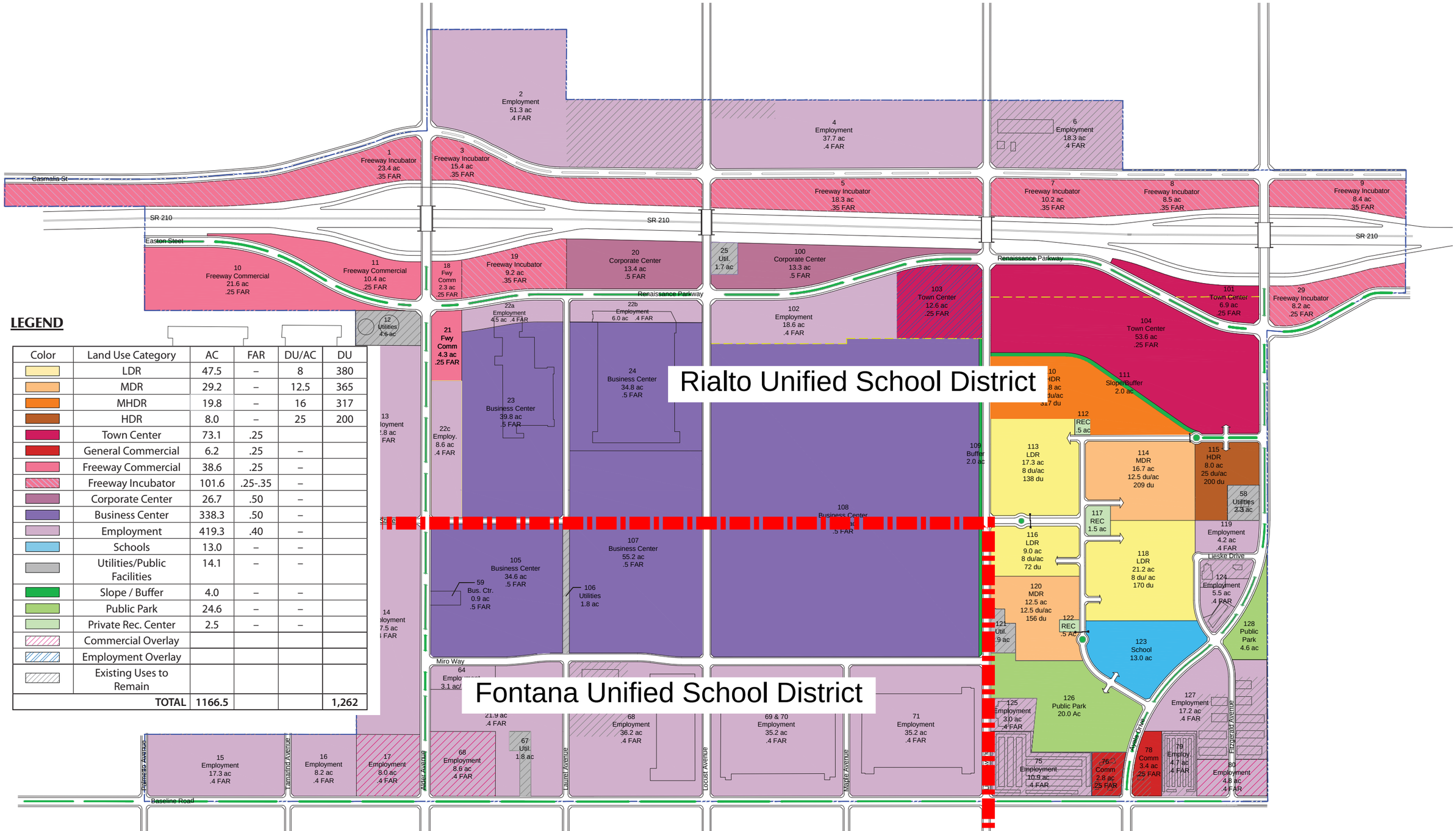
Iris Chu
Director
Facilities Planning

TODAY'S SCHOLARS, TOMORROW'S LEADERS
Rialto Unified School District
Established 1891

Table 3–2 Proposed RSP Amendment Land Use Summary

Land Use	Total Acres	Future Uses						Existing Uses Expected to Remain		
		Acres	Target Density/FAR	Total Sq. Ft.	Total Units	Jobs	Pop.	Acres	Sq. Ft.	Jobs
Residential Uses										
Low Density Residential (LDR)	50.5	50.5	8 du/ac	-	404	-	1,252	-	-	-
Medium Density Residential (MDR)	29.0	29.0	12.5 du/ac	-	363	-	1,124	-	-	-
Medium High Density Residential (MHDR)	19.5	19.5	16 du/ac	-	312	-	967	-	-	-
High Density Residential (HDR)	8.0	8.0	25 du/ac	-	200	-	620	-	-	-
2010 Approved Subtotal	149.5	149.5	-	-	1,666	-	5,166	-	-	-
RSP Amendment Subtotal	107	107	-	-	1,279	-	3,963	-	-	-
Net Change	-42.5	-42.5	-	-	-387	-	-1,203	-	-	-
Business Uses										
Town Center	71.9	71.9	0.25 FAR	782,994	-	1,556	-	-	-	-
Corporate Center	26.7	26.7	0.30 FAR	348,917	-	698	-	-	-	-
Business Center	320.5	187.7	0.5 FAR	4,088,122	-	1,635	-	132.8	2,646,200	1,058
Freeway Commercial	38.6	38.6	0.23 FAR	386,727	-	773	-	-	-	-
Employment	441.4	182.6	0.4 FAR	3,182,332	-	1,464	-	258.8	4,217,825	1,940
Freeway Incubator	85.9	85.9	0.23 FAR	860,618	-	835	-	-	-	-
General Commercial	6.2	2.4	0.25 FAR	26,136	-	52	-	3.8	14,880	30
2010 Approved Subtotal	991.2	991.2	-	15,406,301	-	13,618	-	-	-	850
RSP Amendment Subtotal	595.8	595.8	-	9,675,846	-	7,023	-	-	-	3,028
Net Change	-395.4	-395.4	-	-5,730,455	-	-6,595	-	-	-	+2,179
Other Uses										
School	13	13	-	-	-	50	-	-	-	-
Public Parks	45.9	20.0	-	-	-	-	-	25.9	N/A	N/A
Private Parks/ Recreation Center	2.5	2.5	-	-	-	-	-	-	-	-
Buffer/Slope	4.8	4.8	-	-	-	-	-	-	-	-
Utilities	12.9	0	-	-	-	-	-	12.9	N/A	N/A
ROW	273.3	273.3	-	-	-	-	-	-	-	-
Easement	0	0								
2010 Approved Subtotal	353.9	353.9	-	-	-	-	-	14.8	-	-
RSP Amendment Subtotal	352.4	352.4	-	-	-	50	-	18.7	-	-
Net Change	-1.5	-1.5	-	-	-	-	-	+3.9	-	-
2010 Approved Total	1,438.5	1,335	-	15,406,301	1,667	13,618	5,166	103.5	835,200	850
RSP Amendment Total	1,450.6	1,016.4	-	9,675,847	1,279	7,023	3,963	434	6,878,905	3,029
Overall Net Change	+12.1	-318.6	-	-5,730,454	-387	-6,595	-1,203	+330.5	+6,043,705	+2,179

Renaissance



LEGEND

Color	Land Use Category	AC	FAR	DU/AC	DU
	LDR	47.5	–	8	380
	MDR	29.2	–	12.5	365
	MHDR	19.8	–	16	317
	HDR	8.0	–	25	200
	Town Center	73.1	.25		
	General Commercial	6.2	.25	–	
	Freeway Commercial	38.6	.25	–	
	Freeway Incubator	101.6	.25-.35	–	
	Corporate Center	26.7	.50	–	
	Business Center	338.3	.50	–	
	Employment	419.3	.40	–	
	Schools	13.0	–	–	
	Utilities/Public Facilities	14.1	–	–	
	Slope / Buffer	4.0	–	–	
	Public Park	24.6	–	–	
	Private Rec. Center	2.5	–	–	
	Commercial Overlay				
	Employment Overlay				
	Existing Uses to Remain				
	TOTAL	1166.5			1,262

LEW-016.0
DATE: 10.20.14
1" = 400'
0' 400' 800'

PLACEWORKS

Rialto Unified School District

Renaissance Specific Plan

Estimate of Commercial & Industrial Square Footage

Planning Area	Land Use	Approximate Acreage	Max FAR	SF Estimate	Notes
1	Freeway Incubator	23.4	0.35	356,756	
2	Employment	51.3	0.4	893,851	*Partially developed/Thrify Oil in approval process for 630,200 SF building
3	Freeway Incubator	15.4	0.35	234,788	*Partially developed (ARCO Gas Station)
4	Employment	37.7	0.4	656,885	*Partially developed/Cap Rock under construction for 428,208 SF Building
5	Freeway Incubator	18.3	0.35	279,002	
6	Employment	18.3	0.4	N/A	*Already Developed
7	Freeway Incubator	10.2	0.35	155,509	
8	Freeway Incubator	8.5	0.35	129,591	
9	Freeway Incubator	8.4	0.35	128,066	
10	Freeway Commercial	21.6	0.25	235,224	
11	Freeway Commercial	10.4	0.25	113,256	
13	Employment	22.8	0.4	397,267	
18	Freeway Commercial	2.3	0.25	25,047	
19	Freeway Incubator	9.2	0.35	140,263	
20	Corporate Center	13.4	0.5	291,852	
21	Freeway Commercial	4.3	0.25	46,827	
22c	Employment	5.5*	0.4	95,832	*Partially Developed with Target Facility/Remaining developable acreage is 5.5 acres
22a	Employment	4.5	0.4	N/A	*Already Developed
22b	Employment	6	0.4	N/A	*Already Developed
23	Business Center	14*	0.5	304920	*Partially Developed with Target Facility/Remaining developable acreage is 14 acres
24	Business Center	34.8	0.5	N/A	*Already Developed
102	Employment	18.6	0.4	324,086	
103	Town Center	12.6	0.25	137,214	
104	Town Center	53.6	0.25	583,704	
101	Town Center	6.9	0.25	75,141	
29	Freeway Incubator	8.2	0.25	89,298	
107	Business Center	19.1	0.5	330,480	*Planning Area is split between RUSD and FUSD/Estimate is based on Medline project plans
108	Business Center	98.8	0.5	2,151,864.00	*Planning Area is split between RUSD and FUSD
	Totals	**538.6**		**8,176,725**	

*The data provided herein is for informational purposes only. Lewis-Hillwood Rialto Company, LLC does not gaurantee this information, as final site development plans may vary significantly, and thus final square footages and fees paid are subject to change.

but also because they conform most closely with the descriptions of projects available at the permit stage, which should tend to minimize confusion with respect to the fee collection process.

This methodology allows the determination of student generation factors for students attending within a district, regardless of whether that attendance is based on actual residency within the district or Section 48204 of the Education Code, which states that an elementary student shall be deemed to have met the residency requirements of the district if one or both parents or the legal guardian is employed within district boundaries.

The data on employee density was obtained, per Code[1], from the San Diego Association of Government's ("SANDAG") 1990 Traffic Generators publication, which is generally revised and/or appended on an annual basis[2].

STUDENT GENERATION FACTORS

In order to evaluate the potential impact to the district, student generation factors were determined by category of development. The results of this analysis are presented on Table 9 and show a K-8[3] student generation range from a low of 0.15 students per employee in the Retail category to a high of 0.39 per employee for the Industrial category.

[1] AB 530 was specifically devised to permit the use of employee density figures from this information base.

[2] While data on warehouses is not included in this publication, SANDAG analysts utilize and recommend comparable data from the Institute of Transportation Engineers' Study of Trip Generation, p.183.

[3] This analysis is consistent with the residential analysis in that high school generation factors were not considered.

Table 9
K-8 STUDENT GENERATION FACTORS PER EMPLOYEE
FOR COMMERCIAL/INDUSTRIAL DEVELOPMENT
Rialto Unified School District

Type of Development	Office	Retail	Warehouse	Industrial	R & D
	0.31	0.15	0.26	0.39	0.34

Source: School Planning Services, 2016

IMPACT ANALYSIS

By multiplying the student generation factor per employee by the new facility costs per student, a (school) facility cost per employee can be determined. (The facilities cost per student is determined by computing a weighted average of the grade level costs per student as established in Tables 4 and 5; the weighted average cost per student in RUSD is $23,162.)

The cost per employee is then divided by the employee density or square footage per employee in order to obtain a facility cost per square foot of development. In RUSD, the resulting cost ranges from a low of $7.69 per foot for the Retail category to $33.09 per square foot of Office space (Table 10). The current commercial/industrial fee of $0.56 per square foot represents at most 7 percent of the impact as measured by this analysis.

Table 3–2 Change in Acreage by Land Use (2010 Approved Versus 2016 Revisions)

	2010 Plan	2016 Plan	Change
Residential	**149.5**	**107.0**	**(42.5)**
Low	61.9	50.5	(11.4)
Medium	25.8	29.0	3.2
Medium High	56.8	19.5	(37.3)
High	5.0	8.0	3.0
Non Residential	**935.1**	**991.2**	**56.1**
Retail	109.7	116.7	7.0
Commercial	46.3	43.0	(3.3)
Office	25.5	26.7	1.2
Industrial	753.6	804.9	51.3
Public Spaces	**376.5**	**352.4**	**(24.1)**
Private Rec Center	4.1	2.5	(1.6)
Public Parks	41.9	45.9	4.0
Buffer/Easements	4.6	4.8	0.2
Utilities	11.5	12.9	1.4
Schools	15.0	13.0	(2.0)
ROW	299.4	273.3	(26.1)
Totals	**1,461.1**	**1,450.6**	**(10.5)**

Table 3–3 Change in Units/BSF by Land Use (2010 Approved Versus 2016 Revisions)

	2010 Plan	2016 Plan	Change
Residential	**1,667**	**1,279**	**(388)**
Low	446	404	(42)
Medium	290	363	73
Medium High	818	312	(506)
High	113	200	87
Non Residential	**15,406,301**	**17,484,283**	**2,077,982**
Retail	1,155,429	1,244,367	88,938
Commercial	687,377	616,921	(70,456)
Office	833,085	872,292	39,207
Industrial	12,730,410	14,750,703	2,020,293
Performance Metrics			
Population	5,168	3,964	(1,204)
Employment	14,468	11,578	(2,890)
Jobs/Housing Unit	8.68	9.05	0.37
Housing Units/Acre	11.2	12.0	0.80
Non-Residential FAR	0.38	0.40	0.02
Park Ratio (New Public Parks)	3.1	5.0	1.90

Renaissance

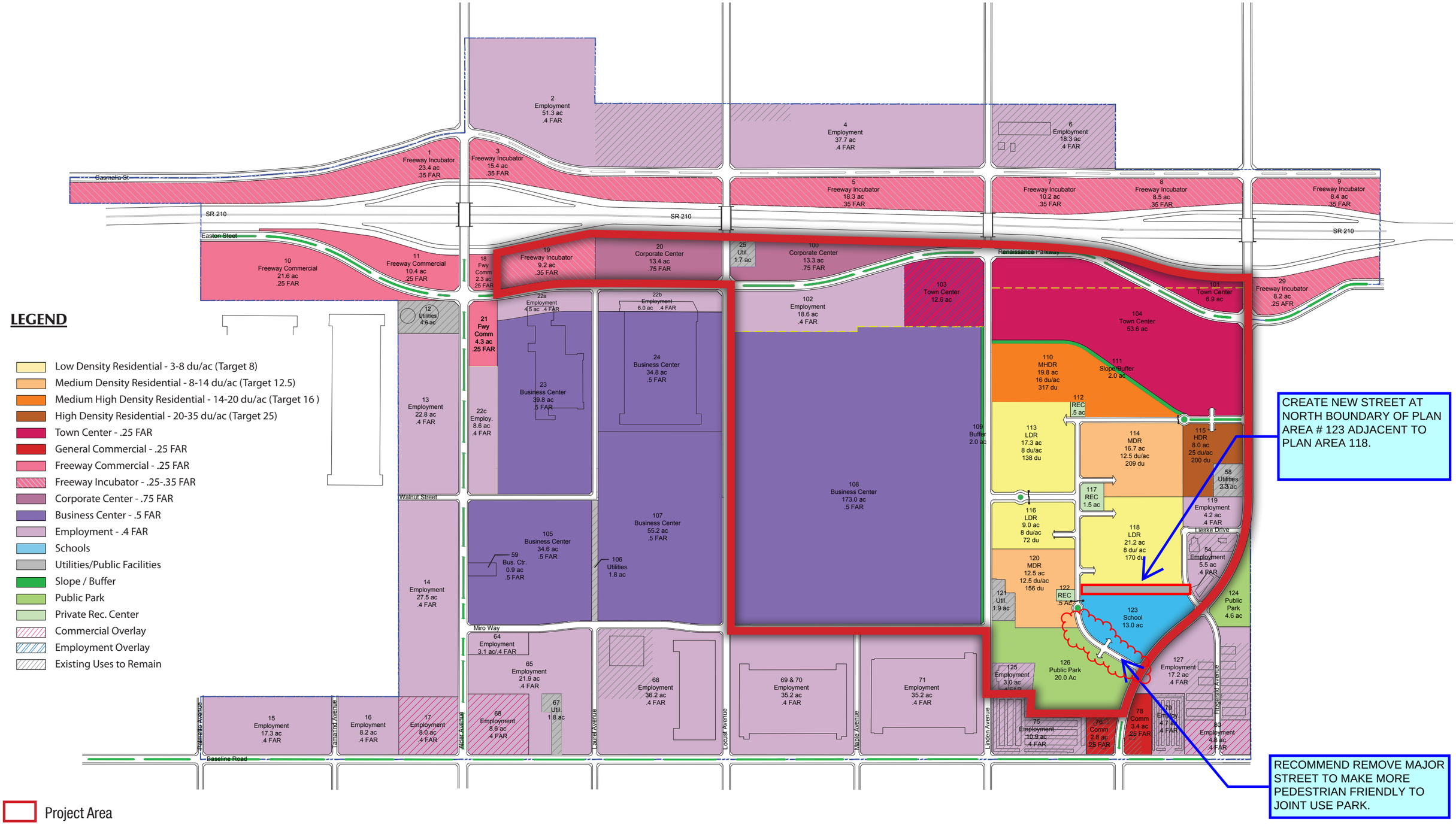
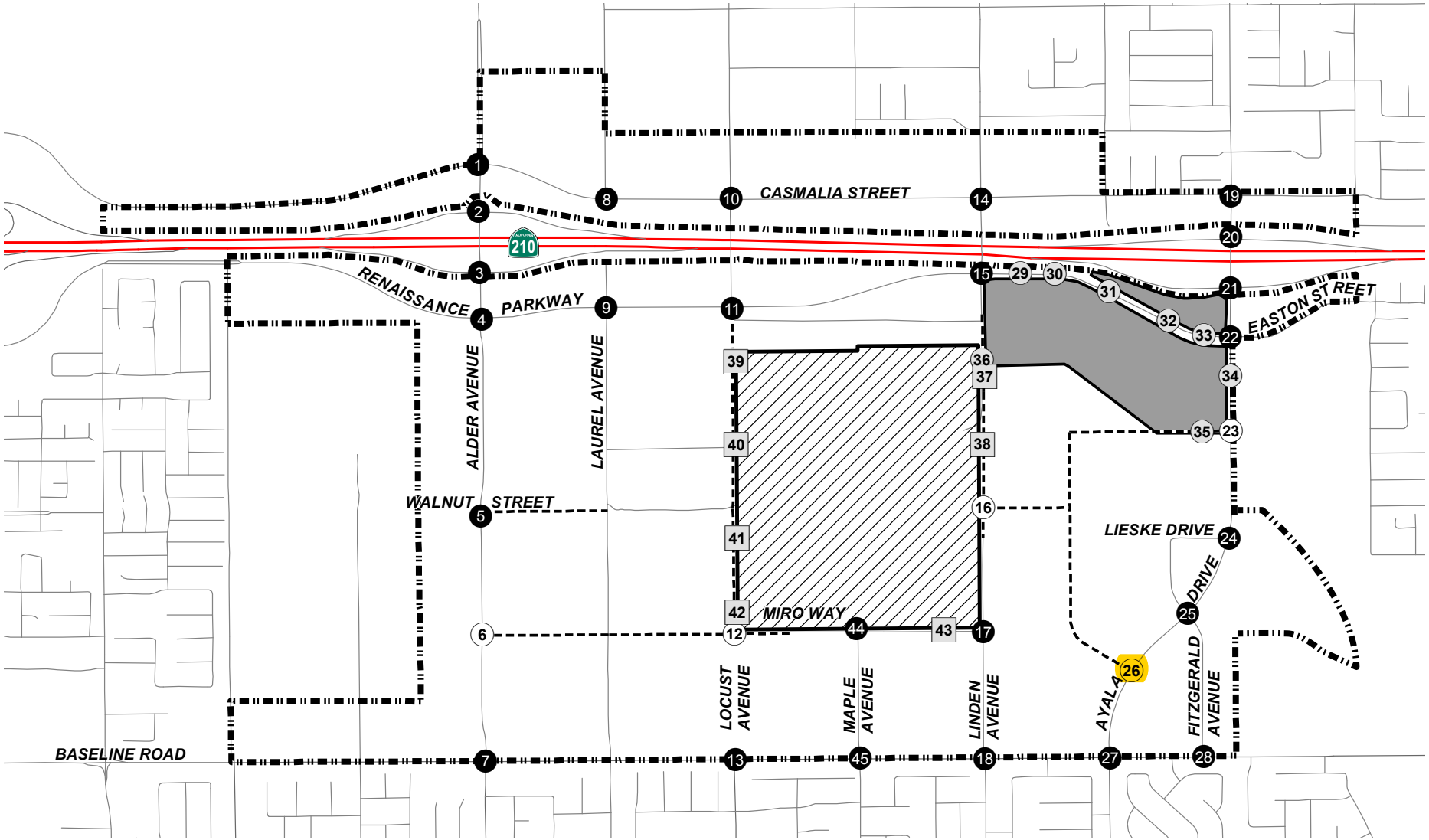


Figure 4: Amended RSP Plan Area

Kimley»Horn



LSA

N

0 750 1,500
Feet

Renaissance Specific Plan
Renaissance Marketplace
PA 108
Future Roads

Study Area Intersections

Existing Intersection
Market Place Driveway
PA 108 Driveway
Future Intersection

Source: LSA, 2015

Figure 4.7-1: Study Area Intersections

Kimley»Horn

OR1A

LOZEAU DRURY LLP

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410 12th Street, Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
rebecca@lozeaudrury.com

November 10, 2016

Via Email and Overnight Mail

Ms. Gina Gibson, Senior Planner
City of Rialto
Development Services Dept.
150 S. Palm Avenue
Rialto, CA 92376
ggibson@rialtoca.gov

Re: **Renaissance Specific Plan Recirculated Draft Subsequent Environmental Impact Report** (SCH No. 2006071021)

Dear Ms. Gibson:

I am writing on behalf of Laborers International Union of North America, Local Union No. 783 and its members living in the City of Rialto and San Bernardino County (collectively "LIUNA" or "Commenters") regarding the Recirculated Draft Subsequent Environmental Impact Report ("RDSEIR") prepared for the Renaissance Specific Plan ("Project" or "RSP") (SCH No. 2006071021). On August 19, 2016, we submitted extensive comments on the Draft Subsequent Environmental Impact Report ("DSEIR") issued in June 2016. After reviewing the RDSEIR, it is evident that the document contains numerous errors and omissions that preclude accurate analysis of the Project. As a result of these inadequacies, the RDSEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. Commenters request that the City of Rialto ("City") address these shortcomings in a new draft environmental impact report and recirculate the DEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist*., 60 Cal. App. 4th 1109, 1121 (1997). Thank you for your consideration of these comments. **OR1A-1**

Sincerely,

Richard Toshiyuki Drury

OR1

LOZEAU DRURY LLP

T 510.836.4200
F 510.836.4205

410 12th Street, Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
rebecca@lozeaudrury.com

August 19, 2016

Via Email and Overnight Mail

Ms. Gina Gibson, Senior Planner
City of Rialto
Development Services Dept.
150 S. Palm Avenue
Rialto, CA 92376
ggibson@rialtoca.gov

Re: **Renaissance Specific Plan Draft Subsequent Environmental Impact Report** (SCH No. 2006071021)

Dear Ms. Gibson:

I am writing on behalf of Laborers International Union of North America, Local Union No. 783 and its members living in the City of Rialto and San Bernardino County (collectively "LIUNA" or "Commenters") regarding the Draft Subsequent Environmental Impact Report ("DSEIR") prepared for the Renaissance Specific Plan ("Project" or "RSP") (SCH No. 2006071021).

After reviewing the DSEIR, together with our team of expert consultants, it is evident that the document contains numerous errors and omissions that preclude accurate analysis of the Project. As a result of these inadequacies, the DSEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. Commenters request that the City of Rialto ("City") address these shortcomings in a revised draft environmental impact report and recirculate the RDEIR prior to considering approvals for the Project. **OR1-1**

Commenters have submitted expert comments from air quality experts Soil Water Air Protection Enterprise ("SWAPE"), who concludes that the DEIR fails to adequately evaluate the Project's air quality impacts. First, the DSEIR makes inaccurate truck trip assumptions that are inconsistent with traffic guidelines set forth by the South Coast Air Quality Management District ("SCAQMD"). As a result, the DSEIR significantly underestimate emissions from truck traffic generated by the Project. **OR1-2A** Second, the DSEIR fails to take into consideration the changed circumstance of State Route 210, which was not fully functional at the time of the 2006 EIR. This changed circumstance to the environmental setting of the Project significantly impacts the traffic impacts of the Project. **OR1-2B** Third, the DSEIR's air quality analysis improperly assumes only **OR1-2C**

OR1-2C Cont.

OR1-2D

unrefrigerated land use, resulting in an underestimate of operational air emissions. Fourth, the RDEIR fails to incorporate all feasible mitigation measures to reduce the Project's significant operational NOx emissions. SWAPE's comments are attached hereto as Exhibit 1 and are incorporated in their entirety.

OR1-3

Commenters also submit comments from expert transportation analyst Daniel Smith, Jr., P.E., a registered civil and traffic engineer. Mr. Smith points out numerous flaws and inconsistencies in the Traffic Impact Analysis that must be addressed in a revised DEIR. Mr. Smith's comments and curriculum vitae are attached hereto as Exhibit 2 and are incorporated by reference in their entirety.

Each of SWAPE's and Mr. Smith's comments require separate responses from the City. These experts and our own independent review demonstrate that the DSEIR is inadequate and that a revised DSEIR should be prepared prior to Project approval to analyze all impacts and require implementation of all feasible mitigation measures.

I. BACKGROUND

OR1-4

In 2010, the City of Rialto ("City") certified an environmental impact report ("EIR") for the Renaissance Specific Plan ("RSP"). That EIR ("2010 RSP EIR") analyzed the RSP, which proposed a total of approximately 16.2 million square feet of business and commercial uses (835,200 square feet of which is existing and expected to remain), 1,667 residential units, one (1) school, one (1) community parks, and multiple neighborhood parks. The RSP project is partially located on the site of the Rialto Municipal Airport in the west central portion of the City of Rialto. The project site is generally bordered on the north by Casmalia Street, on the south by Baseline Road, on the east by Ayala Drive, and on the west by Tamarind Avenue. State Route 210 (SR-210) traverses the northern portion of the project site.

The RSP Draft EIR was released for public review on May 3, 2010; the RSP Final EIR was certified on November 9, 2010. Since certification of the 2010 RSP Final EIR, six addenda to the Final EIR have been prepared and undergone respective CEQA review and approval. They are: Golden Bear Regional Food Distribution Center Project Addendum (2012), SR-210 Logistics Center II Project Addendum (2013), Rialto 42 Distribution Center Project Addendum (2013), Medline Project Addendum (2015), Niagara Project Addendum (2015), and SR-210 Logistics Center III Project Addendum (2015). (2016 RSPA SEIR p. 3-7).

OR1-5

On July 5, 2016, the City issued the Renaissance Specific Plan Amendment Draft Subsequent Environmental Impact Report (June 2016) SCH# 2006071021 ("DSEIR"). The proposed RSP Amendment would allow for the relocation of business and industrial uses to the west of Linden Avenue, the relocation of all residential land uses and the public park to the east of the Linden Avenue, and implementation of the

Renaissance Marketplace retail development and the Planning Area 108 industrial/warehouse development ("PA 108"). In addition to the Specific Plan Amendment, the project includes the Renaissance Marketplace consisting of an approximately 505,500 square foot retail center. The Renaissance SEIR states that "These developments were not specifically identified in the 2010 RSP," and an SEIR is therefore required. (DSEIR, p. 1-2).

OR1-5 Cont.

The 2016 RSPA DSEIR includes Planning Area 108, an industrial/warehouse development comprised of approximately 4 million square feet of industrial/warehouse uses. In the 2010 RSP, this area was designated "Light Industrial," but was not modeled as warehouse space. The Planning Area 108 component of the proposed Project would be developed with up to approximately 4 million square feet of industrial/warehouse uses. The development would include three buildings, each between 1.2 and 1.4 million square feet. Planning Area 108 is located on the north side of Miro Way between Locust and Linden Avenues. Access to the proposed industrial/warehouse uses would be provided by four driveways on Locust Avenue, three driveways on Linden Avenue, and one driveway on Miro Way.

II. LEGAL STANDARDS

CEQA requires that an agency analyze the potential environmental impacts of its proposed actions in an environmental impact report ("EIR") (except in certain limited circumstances). *See*, *e.g.*, Pub. Res. Code § 21100. The EIR is the very heart of CEQA. *Dunn-Edwards v. BAAQMD* (1992) 9 Cal.App.4th 644, 652. "The 'foremost principle' in interpreting CEQA is that the Legislature intended the act to be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." *Comms. for a Better Env't v. Calif. Resources Agency* (2002) 103 Cal. App. 4th 98, 109.

OR1-6

CEQA has two primary purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. 14 Cal. Code Regs. ("CEQA Guidelines") § 15002(a)(1). "Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR 'protects not only the environment but also informed self-government.'" *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564. The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs*. (2001) 91 Cal. App. 4th 1344, 1354 ("*Berkeley Jets*"); *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.

Second, CEQA requires public agencies to avoid or reduce environmental damage when "feasible" by requiring "environmentally superior" alternatives and all

feasible mitigation measures. CEQA Guidelines § 15002(a)(2) and (3); *see also Berkeley Jets*, 91 Cal. App. 4th 1344, 1354; *Citizens of Goleta Valley v. Bd. of Sups.* (1990) 52 Cal.3d 553, 564. The EIR serves to provide agencies and the public with information about the environmental impacts of a proposed project and to "identify ways that environmental damage can be avoided or significantly reduced." CEQA Guidelines §15002(a)(2). If the project will have a significant effect on the environment, the agency may approve the project only if it finds that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns." Pub.Res.Code ("PRC") § 21081; CEQA Guidelines § 15092(b)(2)(A) & (B).

OR1-6 Cont.

The EIR is the very heart of CEQA. *Dunn-Edwards v. BAAQMD* (1992) 9 Cal.App.4th 644, 652. CEQA requires that a lead agency analyze all potentially significant environmental impacts of its proposed actions in an EIR. PRC § 21100(b)(1); CEQA Guidelines § 15126(a); *Berkeley Jets*, 91 Cal.App.4th 1344, 1354. The EIR must not only identify the impacts, but must also provide "information about how adverse the impacts will be." *Santiago County Water Dist. v. County of Orange* (1981) 118 Cal.App.3d 818, 831. The lead agency may deem a particular impact to be insignificant only if it produces rigorous analysis and concrete substantial evidence justifying the finding. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692. "The 'foremost principle' in interpreting CEQA is that the Legislature intended the act to be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." *Cmtys. for a Better Env't v. Cal. Resources Agency* (2002) 103 Cal.App.4th 98, 109.

OR1-7

While the courts review an EIR using an "abuse of discretion" standard, "the reviewing court is not to 'uncritically rely on every study or analysis presented by a project proponent in support of its position. A 'clearly inadequate or unsupported study is entitled to no judicial deference.'" *Berkeley Jets*, 91 Cal. App. 4th 1344, 1355 (emphasis added), quoting, *Laurel Heights Improvement Assn. v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376, 391 409, fn. 12. A prejudicial abuse of discretion occurs "if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process." *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal. App. 4th 713, 722]; *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal. App. 4th 1109, 1117; *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal. App. 4th 931, 946. As discussed below, and in the attached expert comment letters of expert Matthew Hagemann, P.G., C. Hg., expert biologist Dr. Shawn Smallwood, and expert traffic engineer Mr. Daniel Smith, Jr., P.E., the RDEIR for this Project fails to adequately analyze and mitigate the Project's impacts.

III. THE SDEIR FAILS TO ACCURATELY ANALYZE THE PROJECT'S AIR QUALITY IMPACTS.

A. THE SDEIR FAILS TO PROVIDE SUPPORTING DOCUMENTATION FOR AIR QUALITY MODELS

The attached comments from SWAPE point out that the SDEIR and appendices fail to include the air model output files, which are necessary to determine the accuracy of the modeling performed. According to the DSEIR, CalEEMod was used to estimate the construction and operational criteria air pollutant emissions from the Renaissance Marketplace and Planning 108 areas, and was used to estimate the operational emissions from the previously approved RSP and the RSPA (DSEIR, p. 4.2-17). CalEEMod provides recommended default values based on site specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. SWAPE determined that the CalEEMod output files for the Renaissance Marketplace and Planning 108 areas were completely omitted. Rather, the Air Quality and Greenhouse Gas Analysis (Appendix C) only provides the output files for the RSP's and the RSPA's operational emissions (Appendix C, pp. 84). Without the Renaissance Marketplace and Planning 108 output files, SWAPE was unable to verify that the assumptions used within these models are correct and cannot determine what default values were used. While Appendix C of the DSEIR discusses what assumptions were used in the models for calculating the Renaissance Marketplace's and Planning 108's construction and operational emissions, SWAPE was unable to verify that these assumptions were correctly inputted into the model (Appendix C, p. 34, 51). **OR1-8**

As the California Supreme Court stated in *Laurel Heights Improvement Assn. v. Regents of University of California* (2988) 47 Cal. 3d 376, 405:

> "The Regents miss the critical point that the public must be equally informed…. If the Regents considered various alternatives and found them to be infeasible, we assume, absent evidence to the contrary, that they had good reasons for doing so. Those alternatives and the reasons they were rejected, however, must be discussed in the EIR in sufficient detail to enable meaningful participation and criticism by the public." **OR1-9**

Similarly, the court stated in *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3rd 818, 831:

> "The county has attempted to remedy the inadequacies of the EIR by presenting evidence to the trial court to show that there are sufficient water resources available for the project. Indeed, the trial court made findings of fact to such

> effect. This, however, is beside the point. It is the adequacy of the EIR with which we are concerned, not the propriety of the board of supervisors' decision to approve the project. '[W]hatever is required to be considered in an EIR must be in that formal report; what any official might have known from other writings or oral presentations cannot supply what is lacking in the report.'"

Also, the EIR and all supporting documentation must be available for public review during the entire CEQA comment period. CEQA section 21092(b)(1) requires that the CEQA notice for an EIR must include "the address where copies of the proposed EIR and all documents referenced therein are available for review and readily accessible during the agency's normal working hours." (Emphasis added) As noted by a leading CEQA treatise:

OR1-9 Cont.

> The above-referenced section [21092(b)(1)] requires the agency to notify the public of the address at which "all documents referenced in a draft EIR" can be found (and presumably read) . . . seems to require agencies to make available for public review all documents on which agency staff or consultants expressly rely in preparing a draft EIR. In light of case law emphasizing the importance of ensuring that the public can obtain and review documents on which agencies rely for the environmental conclusions (see, e.g., *Emmington v. Solano County Redevel. Agency*, 195 Cal.App.3d 491, 502-503 (1987)), agencies should ensure that they comply literally with this requirement.

Remy, Thomas, Moose & Manley, Guide to the California Environmental Quality Act, p. 300 (Solano Press, 11th Ed. 2007). The courts have held that the failure to provide even a few pages of a CEQA documents for a portion of the CEQA review period invalidates the entire CEQA process. *Ultramar v. South Coast Air Quality Man. Dist*., 17 Cal.App.4th 689 (1993).

CEQA requires that information or data cited by an EIR "as the source of conclusions stated therein . . . shall be reasonably available for inspection at a public place or building." Pub. Resources Code § 21061. Thus, while an EIR may properly rely on third-party studies, it may do so only if it either appends the study in question or notifies the public of its location at the time it makes the EIR available for public review. *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1987) 193 Cal.App.3d 1544, 1549; *San Francisco Ecology Center v. City and County of San Francisco* (1975) 48 Cal.App.3d 584, 595; Pub. Resources Code § 21092(b) (1) (notice of preparation shall specify address where copies of all referenced documents are available for review); see also CEQA Guidelines § 15087(c)(5).

OR1-10

Since the EIR omits critical information necessary for accurate review of the document, the EIR is inadequate as a public information document. The City must

make the CalEEMod date available and reopen the DSEIR public review period once the information is made available to the public. **OR1-10 Cont.**

B. THE DSEIR FAILS TO ACCOUNT FOR EMISSIONS FROM THE WAREHOUSES THAT ARE NOW PROPOSED FOR THE PROJECT.

SWAPE has determined that the DSEIR uses improper air model input files that fail to account for emissions from truck traffic related to the warehouses that are proposed for PA 108. Despite that the fact that PS 108 will include 4 million square feet of warehouses (which involve high levels of heavy truck traffic), the DSEIR modeled emissions using CalEEMod inputs for Light Industrial uses, which have much lower traffic emission. (SWAPE p. 4, citing DSEIR Appendix C, pp. 123). SWAPE concludes that this error significantly underestimates emissions from the Project.

The South Coast Air Quality Management District ("SCAQMD") requires use of the proper input variable in the CalEEMod model. Large warehouses are defined by the SCAQMD as warehouse projects and distribution centers greater than 100,000 square feet. See CalEEMod User Guide, Appendix E: Technical Source Documentation, SCAQMD, available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/high-cube-resource-caleemod-appendix-e.pdf?sfvrsn=2, p. 12. The court of appeal has held that the SCAQMD CEQA thresholds apply in the City of Rialto. *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal. App. 4th 899, 933 (SCAQMD CEQA thresholds apply to City of Rialto). **OR1-11**

The DSEIR fails as an informational document because it fails to account properly for emissions from truck traffic related to the 4 million square feet of warehouse proposed for the Project, and fails to comply with SCAQMD methodology to calculate emissions.

C. THE DSEIR FAILS TO ACCOUNT FOR EMISSIONS FROM REFRIGERATED STORAGE AND TRUCKS.

The DSEIR indicates that many tenants will be engaged in cold (refrigerated) storage, trucking and warehousing. Yet the DSEIR assumes that there will be no cold storage in the Project. Cold storage results in much higher ongoing air pollutant emissions due to the energy required to power refrigeration units on trucks and at the warehouse. The DSEIR's omission of cold storage therefore significantly understates air pollutant and greenhouse gas emissions from the Project. **OR1-12**

The 2010 EIR assumed that approximately 11 percent of the total warehouse floor space for the previously approved RSP (approximately 1,023,112 SF) would be used for cold storage (2010 EIR, p. 4.17-35). The 2010 EIR included Mitigation

Measure AQ-12 of the 2010 Approved DEIR and FEIR states, "A minimum of ten percent of the loading docks for the warehouse/distribution center uses shall contain outdoor electrical hook-up sources for service equipment and trucks such as transportation refrigeration units. In addition, electrical hookups shall be provided at the loading docks located at refrigerated warehouses for transportation refrigeration units visiting these locations. All trucks with transportation refrigeration units are required to connect to the electrical hookups while loading or unloading deliveries to the proposed project. Trucks with transportation refrigeration units are prohibited from accessing refrigerated warehouses unless they have the capability to connect to the electrical hookups" (2010 DEIR, Table 1-1, p. 1-10; FEIR, Table 1-1, p. 3-24).

OR1-12 Thus, it is clear that the Project will include cold storage. Yet, the DSEIR assumes that there will be no cold storage as part of the Project, thereby vastly underestimating the Project's air quality and greenhouse gas emissions. Therefore, the RDEIR must include an analysis of the environmental effects of the Project having tenants that require refrigeration. *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376, 396.

Failing to account for the Project's potential partial use as refrigerated warehouse is a significant omission. Refrigerated trucks tend to idle much longer than typical hauling trucks, even up to an hour. Energy usage from warehouses equipped with industrial size refrigerators and freezers is also much greater when compared to unrefrigerated warehouses. In addition, according to the July 2014 SCAQMD *Warehouse Truck Trip Study Data Results and Usage* presentation, trucks that require refrigeration resulted in greater truck trip rates when compared to non-refrigerated trucks.[1] SWAPE, p.6.

By not including any refrigerated warehouse land uses in the Air Quality Analysis, the emissions from this potential land use are grossly underestimated. An updated RDEIR must be prepared to account for the possibility of refrigerated warehouse needs by tenants.

D. DSEIR USES AN IMPROPER TRUCK TRIP RATE.

OR1-13 SWAPE concludes that the DSEIR uses an improper and inappropriate truck trip rate calculation. (SWAPE, p. 7-8) The DSEIR fails to comply with SCAQMD Guidance concerning truck trip estimation for warehouse projects. As a result, the DSEIR underestimates truck traffic by 24,816 trips, or approximately 9 million trips per year. By using the incorrect trip rates, the DSEIR inaccurately estimates the number of passenger car and truck trips the RSPA's warehouse land uses will generate during operation. (SWAPE p. 8).

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[1] http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/finaltrucktripstudymsc072514.pdf?sfvrsn=2 , p.7

SCAQMD requires the use of the Institute of Transportation Engineers Trip Generation Manual, 9th Edition, 2012 (ITE Manual) in conjunction with their truck mix by axle-type to better quantify trip rates associated with local warehouse and distribution projects. **OR1-13 Cont.**

According to the ITE Manual, an overall vehicle trip rate of 3.56 trips per thousand square feet (trips/TSF) should be used for Warehouse land uses (Land Use Code 150), which is consistent with the trip rate used in the DSEIR's Traffic Impact Analysis (Table 2-A, pp. 41).[2] Furthermore, according to the DSEIR's Traffic Impact Analysis, a passenger car trip rate of 2.136 trips/TSF should also be used for the proposed warehouse land uses (Table 2-A, pp. 41). When these trip rates are utilized, SWAPE found that the RSPA's warehouse land uses would generate approximately 31,410 passenger car trips and approximately 20,881 truck trips for a total of 52,291 trips per day (see table below).

Table 1: SWAPE Updated Daily Vehicle Trips

Land Use	Building Area (SF)	Vehicle Type	Total Number of Daily Trips
Warehouse ITE 150	14,705,000	Passenger Car (LDA)	31,410
		Truck (LHD1, MHD, HHD)	20,881
		SWAPE Total[1]	**52,291**

[1] Total is equal to the number of passenger car (LDA) and truck (LHD1, MHD, HHD) trips. Any other vehicle type was omitted from table.

OR1-14

Therefore, using the recommendations set forth by the SCAQMD and values provided in the DSEIR's Traffic Impact Analysis, the DSEIR should have used the same daily vehicle and truck trip rates as described in the table above. When SWAPE reviewed Appendix C of the DSEIR, however, SWAPE found that the CalEEMod model relied upon an overall trip rate of 3.191 trips/TSF to estimate the number of daily vehicle and truck trips the warehouse land uses would generate during operation, which is not only inconsistent with the DSEIR's Traffic Impact Analysis, but is also inconsistent with the trip rate set forth by the Institute of Transportation Engineers for Warehouse land uses (ITE 150 Warehouse) (DSEIR, Appendix C, pp. 124). When this incorrect trip rate is used, the proposed warehouse land uses would generate approximately 22,139 passenger car trips (LDA) and approximately 5,336 truck trips (LHD1, MHD, HHD), for a combined total of 27,475 trips per day (see table below).

Table 2: DSEIR Daily Vehicle Trips

Land Use	Building Area	Vehicle Type	Total Number of Daily

[2] Institute of Transportation Engineers Trip Generation Manual, 9th Edition, 2012, p. 267

OR1-14 Cont.

	(SF)		Trips
Warehouse ITE 150	14,705,000	Passenger Car (LDA)	22,139
		Truck (LHD1, MHD, HHD)	5,336
		DSEIR Total[1]	**27,475**

[1] Total is equal to the number of passenger car (LDA) and truck (LHD1, MHD, HHD) trips. Any other vehicle type was omitted from table.

The DSEIR's CalEEMod model underestimates the warehouses' number of daily trips made by passenger cars and trucks by 24,816 trips, or approximately 9 million trips per year. By using the incorrect trip rates, the DSEIR inaccurately estimates the number of passenger car and truck trips the RSPA's warehouse land uses will generate during operation.

E. DSEIR USES AN INCORRECT TRUCK FLEET MIX.

OR1-15

SWAPE points out that the DSEIR fails to use the truck fleet mix set forth by the SQAMD, and that this results in a significant underestimation of Project emissions. The SCAQMD recommends that lead agencies assume a truck fleet mix of 40%. According to *Appendix E: Technical Source Documentation* of the CalEEMod User's Guide, "in order to avoid underestimating the number of trucks visiting warehouse facilities," SCAQMD staff "recommends that lead agencies conservatively assume that an average of 40% of total trips are truck trips."[3] This 40% truck fleet percentage is also used in the DSEIR's Traffic Impact Analysis to estimate the number of truck trips the RSPA's proposed warehouse land uses would generate (Table 2-A, pp. 41).

Review of the DSEIR's CalEEMod output files, however, demonstrates that a truck fleet (LHDT1, MHD, and HHDT) percentage of approximately 11% was used, rather than the 40% value recommended by the SCAQMD (DSEIR, Appendix C, pp. 129). As a result, the RSPA's warehouse truck emissions are greatly underestimated. (SWAPE p. 8-9). SWAPE points out that the DSEIR also fails to use the SCAQMD fleet mix with respect to the number of axels per truck. This results in a further underestimation of Project air quality and greenhouse gas emissions. A revised DSEIR is required to correct these errors.

F. THE DSEIR USES AN INCORRECT TRUCK TRIP LENGTH.

OR1-16

SWAPE concludes that the DSEIR uses an improper truck trip length, disregarding guidance from the SCAQMD. This further underestimates air quality and greenhouse gas emissions from the Project. The DSEIR assumes and average truck

[3] "Appendix E Technical Source Documentation." CalEEMod User's Guide, July 2013, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/high-cube-resource-caleemod-appendix-e.pdf?sfvrsn=2, pp. 15

trip length of 16.6 miles, which is the number for light industrial projects. However, for warehouse projects, such as this one, SCAQMD recommends a much longer truck trip length of 40 miles. Since the Project will involve 4 millions square feet of warehouse uses, the DSEIR should use the SCAQMD 40 mile truck trip length. **OR1-16 Cont.**

G. CORRECTED EMISSION CALCULATION IS MUCH HIGHER THAN DISCLOSED IN THE DSEIR.

SWAPE corrected all of the above-mentioned errors and miscalculations. The result was that the corrected air pollutant emissions from the Project are approximately double the emissions set forth in the DSEIR. When correct input parameters are used to model emissions from the proposed warehouse land uses, we find that the RSPA's peak operational criteria air pollutant emissions not only exceed SCAQMD regional thresholds, but these emissions also increase significantly when compared to the DSEIR's RSPA model (see table below). **OR1-17**

Summary of Peak Operational Emissions - Summer						
Operational Activities	**Emissions (pounds per day)**					
	ROG	**NOX**	**CO**	**SOX**	**PM10**	**PM2.5**
RSPA (Excluding Warehouse Land Uses)	694	572	2,302	5	337	97
Warehouse Area Source	385	0	2	0	0	0
Warehouse Energy Source	3	30	25	0	2	2
Warehouse Mobile (Trucks)	444	7,587	4,303	24	850	317
Warehouse Mobile (Passenger Cars)	79	103	1,510	4	398	107
SWAPE's Total Maximum Daily Emissions	**1,604**	**8,291**	**8,143**	**33**	**1,587**	**523**
DSEIR's Total Maximum Daily Emissions	**1,291**	**1,409**	**5,065**	**13**	**798**	**234**
SCAQMD Regional Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Thresholds Exceeded?	***Yes***	***Yes***	***Yes***	***Yes***	***Yes***	***Yes***

OR1-17 Cont.

Summary of Peak Operational Emissions - Winter						
Operational Activities	**Emissions (pounds per day)**					
	ROG	**NOX**	**CO**	**SOX**	**PM10**	**PM2.5**
RSPA (Excluding Warehouse Land Uses)	687	596	2,179	5	337	97
Warehouse Area Source	385	0	2	0	0	0
Warehouse Energy Source	3	30	25	0	2	2
Warehouse Mobile (Trucks)	453	7,910	4,585	24	850	317
Warehouse Mobile (Passenger Cars)	73	109	1,265	4	398	107
SWAPE's Total Maximum Daily Emissions	**1,601**	**8,645**	**8,056**	**33**	**1,588**	**524**
DSEIR's Total Maximum Daily Emissions	**1,277**	**1,465**	**4,703**	**12**	**798**	**234**
SCAQMD Regional Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Thresholds Exceeded?	***Yes***	***Yes***	***Yes***	***Yes***	***Yes***	***Yes***

As one can see in the tables above, ROG emissions increase by approximately 25%, NO_x emissions increase by approximately 490%, SO_x emissions increase by approximately 65%, PM_{10} emissions increase by approximately 99%, and $PM_{2.5}$ emissions increase by approximately 124% for both summer and winter seasons. These updated emission estimates demonstrate that when the RSPA's warehouse emissions are estimated correctly, the Project would result in substantially more severe significant effects than what was previously examined in both the 2010 EIR, as well as the 2016 DSEIR (DSEIR, p. 2-3).

OR1-18

Even though these emissions were deemed significant in the DSEIR, the document must not only properly identify significant impacts, it must also describe how adverse those impacts will be. *Kings Co v. Hanford* (1990) 221 CA3d 692, 712-718. As a result, an updated DSEIR should be prepared that includes an updated model to adequately estimate the Project's operational warehouse emissions, and additional mitigation measures should be incorporated in an effort to reduce the Project's emissions to a less-than-significant level.

OR1-19

SWAPE also concludes that when these errors are corrected, the Project has 50% higher greenhouse gas emissions than set forth in the DSEIR, and 50% higher emissions than set forth in the 2010 EIR. (SWAPE, p. 15) Thus, the DSEIR's conclusion that the Project has no more significant greenhouse gas impacts is erroneous. The Project would increase GHG emissions from 180,000 metric tons per year to 270,000 metric tons per year – an increase of 90,000 MT, or 50%. This increase is 30 times greater than the SCAQMD CEQA significance threshold for GHGs of 3,000 MT/year. Thus, the DSEIR fails as an informational document for failing to disclose this significant impact of the Project.

Project	Greenhouse Gas Emissions (MT CO_2e/yr)
Approved 2010 RSP	180,000
RSPA	270,000
Net Increase	**90,000**
Percent Increase	***50%***

OR1-19 Cont.

H. DSEIR FAILS TO PROPOSE ALL FEASIBLE MITIGATION MEASURES.

SWAPE concludes that the DSEIR fails to propose all feasible mitigation measures. The City may not issue a statement of overriding considerations until all feasible mitigation measures are implemented. SWAPE identifies numerous feasible mitigation measures that should be required to reduce project air quality impacts. Many of these measures have been implemented for other projects or are recommended by the SCAQMD or other public agencies.

Additional mitigation measures that could be implemented include, but are not limited to, the following: [4]

- Use Zero-VOC emission paints;
    - The Project Applicant should consider the use of zero-VOC emission paints, which has been required for numerous projects that have undergone CEQA review. Zero-VOC emission paints are commercially available. Other low-VOC standards should be incorporated into mitigation including use of "super-compliant" paints, which have a VOC standard of less than 10 g/L.
- Use material that does not require paint;
    - Using materials that do not require painting is a common mitigation measure where VOC emissions are a concern. Interior and exterior surfaces, such as concrete, can be left unpainted.
- Use spray equipment with greater transfer efficiencies;
    - Various coatings and adhesives are required to be applied by specified methods such as electrostatic spray, high-volume, low-pressure (HVLP) spray, roll coater, flow coater, dip coater, etc. in order to maximize the transfer efficiency. Transfer efficiency is typically defined as the ratio of the weight of coating solids adhering to an object to the total weight of coating solids used in the application process, expressed as a percentage. When

OR1-20

[4] http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf

it comes to spray applications, the rules typically require the use of either electrostatic spray equipment or HVLP spray equipment. The SCAQMD is now able to certify HVLP spray applicators and other application technologies at efficiency rates of 65 percent or greater. [5]

- Use passive solar design, such as: [6,7]
  - Orient buildings and incorporate landscaping to maximize passive solar; heating during cool seasons, and minimize solar heat gain during hot seasons; and
  - Enhance natural ventilation by taking advantage of prevailing winds.
- Reduce unnecessary outdoor lighting by utilizing design features such as limiting the hours of operation of outdoor lighting.

OR1-20 Cont.

- Develop and follow a "green streets guide" that requires:
  - Use of minimal amounts of concrete and asphalt;
  - Installation of permeable pavement to allow for storm water infiltration; and
  - Use of groundcovers rather than pavement to reduce heat reflection.[8]
- Implement Project design features such as:
  - Shade HVAC equipment from direct sunlight;
  - Install high-albedo white thermoplastic polyolefin roof membrane;
  - Install high-efficiency HVAC with hot-gas reheat;
  - Install formaldehyde-free insulation; and
  - Use recycled-content gypsum board.
- Provide education on energy efficiency to residents, customers, and/or tenants. Provide information on energy management services for large energy users.
- Meet "reach" goals for building energy efficiency and renewable energy use.
- Install solar, wind, and geothermal power systems and solar hot water heaters.
- Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on all building roofs and/or on the Project site to generate solar energy for the facility.
- Include energy storage where appropriate to optimize renewable energy generation systems and avoid peak energy use.

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[5] http://www.aqmd.gov/home/permits/spray-equipment-transfer-efficiency
[6] Santa Barbara Air Pollution Control District, Scope and Content of Air Quality Sections in Environmental Documents, September 1997.
[7] Butte County Air Quality Management District, Indirect Source Review Guidelines, March 1997.
[8] *See* Irvine Sustainable Travelways "Green Street" Guidelines; www.ci.irvine.ca.us/civica/filebank/blobdload.asp?BlobID=8934; and Cool Houston Plan; www.harc.edu/Projects/CoolHouston.

- Plant low-VOC emitting shade trees, e.g., in parking lots to reduce evaporative emissions from parked vehicles.
- Use CARB-certified or electric landscaping equipment in project and tenant operations; and introduce electric lawn, and garden equipment exchange program.
- Install an infiltration basin to provide an opportunity for 100% of the storm water to infiltrate on-site.

OR1-20 Cont.

In addition to the measures discussed above, the SCAQMD has previously recommended additional mitigation measures for operational NO_x emissions that result primarily from truck activity emissions for similar projects. These measures would also effectively reduce the Project's operational VOC, NO_x, CO, PM_{10}, $PM_{2.5}$, and GHG emissions. In this case, these measures would apply to the Project's proposed industrial and commercial land uses. Measures recommended for the Waterman Logistic Center that are also applicable for this Project include[9]:

- Provide electric vehicle charging stations that are accessible for trucks.
- Provide electrical hookups at the onsite loading docks and at the truck stops for truckers to plug in any onboard auxiliary equipment.
    - According to Mitigation Measure AQ-12 of the 2010 Approved FEIR, the Project proposes to equip only 10 percent of the loading docks for the warehouse/distribution center uses with these electrical hookups (p. 3-24). However, we require that this measure be extended to all of the loading docks for the warehouse/distribution center uses, as well as all of the loading docks for all of the other proposed land uses, such as the commercial and retail uses.
- Require the proposed warehouse to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in.
- Limit the daily number of trucks allowed at the facility to levels analyzed in the DSEIR and 2010 EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level.
- Limit the truck trip miles allowed to levels analyzed in the DSEIR and 2010 EIR. If higher truck trip miles are anticipated or required, the Lead Agency should

OR1-21

[9] SCAQMD Comment Letter in Response to MND for the Waterman Logistic Center, January 2018, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/january/mndwaterman.pdf

OR1-21 Cont.

commit to re-evaluating the project through CEQA prior to allowing this higher activity level.

- Design the site such that any check-in point for trucks is well inside the facility to ensure that there are no trucks queuing outside of the facility.
- On-site equipment should be alternative fueled.
- Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to travel through residential neighborhoods.
- Improve traffic flow by signal synchronization.
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- Should the proposed Project generate significant emissions, the Lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in emissions, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts.

OR1-22

Finally, in addition to the measures described above, the DSEIR proposes to implement the following mitigation measures to reduce operational VOC, NO_x, CO, PM_{10}, $PM_{2.5}$, and GHG emissions for the proposed the Renaissance Market Place and Planning Area 108, exclusively (p. 1-7). Therefore, we propose that these mitigation measures also be extended to the entire RSPA in order to reduce emissions to the maximum extent feasible. These mitigation measures include:

- Prior to the issuance of building permits, the Project applicant shall submit to the satisfaction of the Public Works Director, evidence that development within the RSPA comply with Title 24 of the California Code of Regulations (CCR) established by the CEC regarding energy conservation and green buildings standards. The Project applicant shall incorporate the following in building plans:
    - Low-emission water heaters shall be used. Solar water heaters are encouraged.
    - Exterior windows shall utilize window treatments for efficient energy conservation (p. 1-7).
- Design all project buildings to meet or exceed the California Building Code's (CBC) Title 24 energy standard, including, but not limited to, any combination of the following:

- o Increase insulation such that heat transfer and thermal bridging is minimized;
- o Limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption; and
- o Incorporate ENERGY STAR or better rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment.

- Install efficient lighting and lighting control systems. Use daylight as an integral part of the lighting systems in buildings.
- Install "cool" roofs and cool pavements.
- Install energy-efficient heating and cooling systems, appliances and equipment, and control systems.
- Install solar lights or light-emitting diodes (LEDs) for outdoor lighting or outdoor lighting that meets the City of Rialto City Code.
- Install solar photovoltaic or other technology to generate electricity on-site to reduce consumption from the electrical grid.
- Install electrical vehicle charging stations to promote the use of electrical vehicles (p. 1-13).

OR1-22 Cont.

These measures are more stringent and prescriptive than those measures identified in the 2010 Approved EIR for the RSP and in the DSEIR for the RSPA. When combined together, these measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduces emissions released during Project operation. An updated DSEIR must be prepared to include additional mitigation measures, as well as include an updated air quality and greenhouse gas analysis to ensure that the necessary mitigation measures are implemented to reduce operational emissions to below thresholds. Furthermore, the Project Applicant needs to demonstrate commitment to the implementation of these measures prior to Project approval, to ensure that the Project's operational emissions are reduced to the maximum extent possible.

IV. TRAFFIC IMPACT ANALYSIS IS INCOMPLETE AND FLAWED.

Traffic engineer, Daniel Smith, PE, concludes that the DSEIR's traffic analysis is fatally flawed and fails to include numerous feasible mitigation measures.

A. THE DSEIR FAILS TO DISCLOSE OR MITIGATION IMPACTS TO 13 ROADWAY SEGMENTS.

Mr. Smith concludes that the DSEIR fails to disclose significant impacts of the Project on 13 roadway segments. (Smith, p. 2). This renders the document legally inadequate since one of the primary functions of any EIR is to identify significant impacts of the project. Furthermore, to the DSEIR states that if levels of service ("LOS") fall below acceptable levels at these roadway segments in the future, the actual mitigation measure proposed, TRANS-1, leaves it up to the City Traffic Engineer to review individual site-specific development proposals, determine whether they would cause LOS failures, and determine what of the improvements listed on the above cited tables the individual development would be responsible for either constructing or making monetary contribution toward the cost of construction.

OR1-23

This indefinite future mitigation at the discretion of the City Traffic Engineer constitutes a deferral of mitigation that is improper under CEQA. "A study conducted after approval of a project will inevitably have a diminished influence on decisionmaking. Even if the study is subject to administrative approval, it is analogous to the sort of post hoc rationalization of agency actions that has been repeatedly condemned in decisions construing CEQA." *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 307. "[R]eliance on tentative plans for future mitigation after completion of the CEQA process significantly undermines CEQA's goals of full disclosure and informed decisionmaking; and[,] consequently, these mitigation plans have been overturned on judicial review as constituting improper deferral of environmental assessment." *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 92. "Deferral of the specifics of mitigation is permissible where the local entity commits itself to mitigation and lists the alternatives to be considered, analyzed and possibly incorporated in the mitigation plan. [Citation.] On the other hand, an agency goes too far when it simply requires a project applicant to obtain a biological [or other] report and then comply with any recommendations that may be made in the report." *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1275.

Mr. Smith also points out that the DSEIR relies on mitigation measures without identifying adequate funding to implement those measures. The measures proposed in the DSEIR would cost over $11 million. (Smith p. 2). The DSEIR does not identify funding streams for over $2.5 million of this amount. Id. Mitigation fees are not adequate mitigation unless the lead agency can show that the fees will fund a specific mitigation plan that will actually be implemented in its entirety. *Napa Citizens for Honest Gov. v.*

OR1-24

Bd. Of Supervisors (2001) 91 CallApp.4th 342 (no evidence that impacts will be mitigated simply by paying a fee); *Anderson First Coal. v. City of Anderson* (2005) 130 Ca.App.4th 1173 (traffic mitigation fee is inadequate because it does not ensure that mitigation measure will actually be implemented); *Kings Co. Farm Bureau v. Hanford* (1990) 221 Cal.App.3d 692. **OR1-24 Cont.**

A recirculated DSEIR is required to disclose these significant impacts and to propose specific mitigation measures to reduce the impacts, with adequate funding.

B. DSEIR TRAFFIC ANALYSIS FAILS TO CONSIDER INCREASED TRAFFIC IN SR-210.

The DSEIR concludes that traffic from the Project will be similar to traffic calculated in the 2010 EIR. However, Mr. Smith points out that this conclusion ignore increased traffic on State Route 210 that has occurred since 2010.

The local roadway traffic counts for the 2010 EIR were taken in 2008 or in 2006 and 2007 and factored up to assumed 2008 conditions based on growth rates; the state highway system counts were from 2007. However, in this period of time, SR 210 in the immediate RSP Project area was undergoing reconstruction from a surface highway to a freeway with the north south cross streets being reconstructed as interchanges and overcrossings and much of the surface street infrastructure in both the north-south and east-west directions was discontinuous. Consequently, the traffic baseline conditions against which the Project's regional impacts were measured was of dubious representativeness. As evidence of this, we present the following comparison of Caltrans posted 2007 and 2014 traffic volumes for SR 210. **OR1-25**

SR 210 2007 to 2014 Traffic Volume Comparison

Location	2007		2014		% Growth 07-14	
	Daily	Pk. HR.	Daily	Pk. Hr.	Daily	Pk. Hr.
E. of Sierra	12,000	1,150	108,000	8,600	900%	748%
W. of Riverside	19,000	1,850	111,000	8,600	579%	465%
E. of Riverside	27,500	2,650	105,000	8,400	382%	317%
W of I-215	30,000	2,700	106,000	8,500	353%	315%

As can be seen in the table, background traffic volumes on SR 210 have increased in the Project area between 2007 and 2014 by between 353 to 900 percent and peak hour volumes have increased between 315 and 748 percent.

Given this change in SR 210 background traffic, even though there may be no meaningful difference in the *amount* of traffic contributed by the RSPA versus the RSP, **OR1-26**

OR1-26 Cont.

Mr. Smith concludes that given the massive change in background traffic on the SR 210, the amount of traffic the RSPA does contribute is clearly likely to have *far more significant consequences* than was RSP traffic measured against the anomalous traffic baseline that was used in the 2010 EIR. In this circumstance, compliance with the good faith effort to disclose impact that CEQA demands logically requires complete analysis of the regional traffic impacts against the current traffic baseline. The DSEIR is deficient for failing to do this.

OR1-27

This drastically increased traffic on SR 210 constitutes a "substantial change … with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects." CEQA Guidelines 15162(a)(2). A revised DSEIR must be prepared which accurately describes the traffic setting for the Project, which is much different than it was in 2010. As the court stated in *Friends of Eel River v. Sonoma County Water Agency*, 108 Cal. App. 4th 859, 874 (2003):

> There is good reason for this requirement: "Knowledge of the regional setting is critical to the assessment of environmental impacts. . . . The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context." (Guidelines, § 15125, subd. (c).) We interpret this Guideline broadly in order to "afford the fullest possible protection to the environment." (*Kings County Farm Bureau, supra*, 221 Cal. App. 3d 692, 720.) In so doing, we ensure that the EIR's analysis of significant effects, which is generated from this description of the environmental context, is as accurate as possible. (See also Remy et al., *Guide to the Cal. Environmental Quality Act (CEQA)* (10th ed. 1999), pp. 374-376.)

V. THE CITY SHOULD PREPARE AND RECIRCULATE A SUPPLEMENTAL DEIR

OR1-28

Recirculation of an EIR prior to certification is required "when the new information added to an EIR discloses: (1) a new substantial environmental impact resulting from the project or from a new mitigation measure proposed to be implemented; (2) a substantial increase in the severity of an environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance; (3) a feasible project alternative or mitigation measure that clearly would lessen the environmental impacts of the project, but which the project's proponents decline to adopt; or (4) that the draft EIR was so fundamentally and basically inadequate and conclusory in nature that public comment on the draft was in effect meaningless." CEQA Guidelines §15162; *Laurel Heights Improvement Assn. v. Regents of University of Cal.* (1993) 6 Cal. 4th

1112, 1130 (citing *Mountain Lion Coalition v. Fish & Game Comm'n* (1989) 214 Cal.App.3d 1043).

Recirculation is required where "significant new information" has been added to an EIR. *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 447. New information is "significant" where it results in a change to the EIR's analysis or mitigation of a substantial adverse environmental effect to the EIR. *Id.* **OR1-28 Cont.**

Here, the DSEIR must be revised to address the many deficiencies identified above.

VI. CONCLUSION

For the foregoing reasons, LIUNA believes the Renaissance Specific Plan DSEIR is wholly inadequate. LIUNA urges the City to make the above changes, and recirculate a revised DSEIR to the public for review. Thank you for your attention to these comments.

Sincerely,

Richard Toshiyuki Drury

EXHIBIT 1

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August 15, 2016

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Subject: Comments on the Renaissance Specific Plan Amendment

Dear Mr. Drury:

We have reviewed the 2010 Draft Environmental Impact Report (DEIR) and the 2010 Final Environmental Impact Report (FEIR) for the previously approved Renaissance Specific Plan (RSP), and the June 2016 Draft Subsequent Environmental Impact Report (DSEIR) for the Renaissance Specific Plan Amendment (RSPA) ("Project"). The RSPA is an amendment to the approved 2010 RSP. The 2010 RSP consists of approximately 1,445.3 gross acres located within the western/central portion of the City. The RSP at the time of approval was planned to accommodate 16.2 million square feet (SF) of business and commercial uses (835,200 SF of which were existing and would remain), 1,667 residential units, one school, a community park, and multiple neighborhood parks all located in proximity to one another and organized in a grid pattern. The RSP Amendment proposed the relocation of business and industrial uses to the west of Linden Avenue; relocation of all residential land uses and the public park to the east side of Linden Avenue; and implementation of the Renaissance Marketplace retail development and the Planning Area 108 industrial/warehouse development. In addition to the Specific Plan Amendment, the project includes the Renaissance Marketplace consisting of an approximately 505,500 square foot retail center as well as the Planning Area 108 development comprised of approximately 4 million square feet of industrial/warehouse uses. These developments were not specifically identified in the 2010 RSP.

The DSEIR concludes that the proposed Project would not result in any new significant impacts that were not analyzed in the approved 2010 RSP, nor would it cause a substantial increase in the severity of any previously identified environmental impacts. Our review, however, concludes that the DSEIR fails to adequately evaluate the Project's Air Quality and Greenhouse Gas impacts. As a result, air pollutant and greenhouse gas (GHG) emissions associated with construction and operation of the Project are underestimated. An updated Draft Subsequent Environmental Impact Report (DSEIR) should be prepared to adequately assess the potential impacts the Project may have on regional and local air quality.

Air Quality

Failure to Provide CalEEMod Output Files

According to the DSEIR, CalEEMod was used to estimate the construction and operational criteria air pollutant emissions from the Renaissance Marketplace and Planning 108 areas, and was used to estimate the operational emissions from the previously approved RSP and the RSPA (DSEIR, p. 4.2-17). CalEEMod provides recommended default values based on site specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but CEQA requires that such changes be justified by substantial evidence.[1] Once all the values are inputted into the model, the Project's construction and operational emissions are calculated, and "output files" are generated. These output files disclose to the reader what parameters were utilized in calculating the Project's air pollution emissions, and make known which default values were changed as well as provide a justification for the values selected.[2]

OR1-29 After review of the DSEIR and associated appendices, we find that the CalEEMod output files for the Renaissance Marketplace and Planning 108 areas were completely omitted. Rather, the Air Quality and Greenhouse Gas Analysis (Appendix C) only provides the output files for the RSP's and the RSPA's operational emissions (Appendix C, pp. 84). Without the Renaissance Marketplace and Planning 108 output files, we are unable to verify that the assumptions used within these models are correct and cannot determine what default values were used. While Appendix C of the DSEIR discusses what assumptions were used in the models for calculating the Renaissance Marketplace's and Planning 108's construction and operational emissions, we are unable to verify that these assumptions were correctly inputted into the model (Appendix C, p. 34, 51). Furthermore, we are unable to review the CalEEMod output files to determine if any other default values were changed or if project specific information was omitted from the model. As a result, the criteria air pollutant emission estimates provided in the DSEIR and associated appendices are unreliable and should not be used to determine Project significance, since there is no documentation verifying the values.

Without providing the entire CalEEMod report, the reviewer cannot fully understand the assumptions that were made about the Project, and cannot verify whether those assumptions are justified. Furthermore, by failing to provide the CalEEMod output files for Planning Area 108 and the Renaissance Marketplace, we are unable to prepare an updated construction health risk, as discussed in the sections below. An updated DSEIR should be prepared that adequately address the air quality impacts associated with the proposed Project and provides the complete CalEEMod output files.

Unsubstantiated Input Parameters Used to Estimate Project Emissions

OR1-30 Even though the Renaissance Market Place and Planning Area 108 CalEEMod output files were not provided, we were still able to review the RSPA and RSP modeling outputs. When reviewing the RSPA's

[1] CalEEMod User Guide, p. 2, 9, *available at:* http://www.caleemod.com/

[2] CalEEMod User Guide, p. 7, 13, *available at:* http://www.caleemod.com/ (A key feature of the CalEEMod program is the "remarks" feature, where the user explains why a default setting was replaced by a "user defined" value. These remarks are included in the report.)

CalEEMod output files, we found that several of the values inputted into the model are not consistent with information disclosed in the DSEIR and are not consistent with guidance set forth by the South Coast Air Quality Management District (SCAQMD) for large warehousing projects. As a result, emissions associated with operation of the Project are greatly underestimated. An updated DSEIR should be prepared to adequately assess the potential impacts that operation of the Project may have on regional and local air quality. **OR1-30 Cont.**

Use of Incorrect Land Use Type for Proposed Warehouses

According to the DSEIR and associated appendices, the RSPA includes the development of several warehouse land uses. Even though the DSEIR proposes to construct multiple large warehouses,[3] the emissions from these proposed warehouses are not accounted for within the RSPA's air model. This presents a significant issue, as large warehouse projects generate a higher volume of heavy duty trucks when compared to other industrial land uses.[4] Therefore, by failing to account for these proposed warehouse land uses within the CalEEMod model, the Project's operational emissions are greatly underestimated. An updated air quality analysis should be prepared to adequately evaluate the air quality impacts of the proposed warehouse land uses within the RSPA.

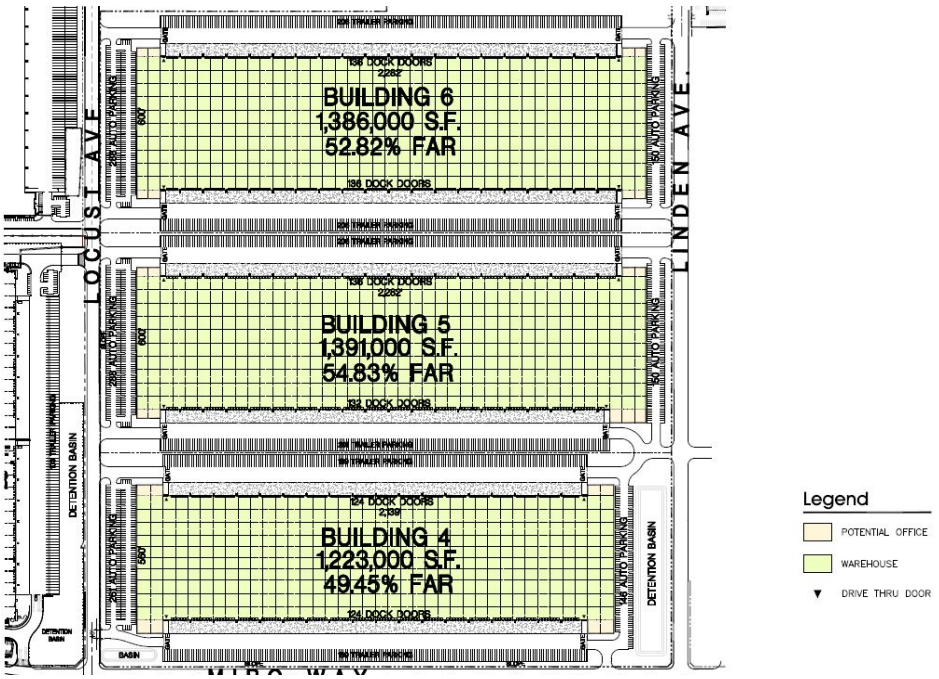
According to the DSEIR's Traffic Impact Analysis (Appendix H), the proposed Business Center and Employment land uses are anticipated to be made up of warehouses (see excerpt below) (Appendix H, Table 2-A, pp. 41). **OR1-31**

Specific Plan Land Use Designation	ITE Land Use[1]	ITE Code
Business Center	Warehouse	150 - -
Employment	Warehouse	150 - -

This assertion is further supported by the land uses proposed in Planning Area 108. According to the DSEIR, Planning Area 108, which is identified as a Business Center land use, includes the development of three warehouse buildings totaling approximately four million square feet of warehouse space (see figure below) (DSEIR, Figure 3-6, p. 3-17).

[3] Large warehouses are defined by the SCAQMD as warehouse projects and distribution centers greater than 100,000 square feet. *See* CalEEMod User Guide, Appendix E: Technical Source Documentation, SCAQMD, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/high-cube-resource-caleemod-appendix-e.pdf?sfvrsn=2, p. 12

[4] CalEEMod User Guide, Appendix E: Technical Source Documentation, SCAQMD, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/high-cube-resource-caleemod-appendix-e.pdf?sfvrsn=2, p. 12



OR1-31 Cont.

Therefore, using this information, we can reasonably assume that the proposed Business Center (includes Planning Area 108) and Employment land uses would be made up of warehouses, which means that RSPA's operational emissions should have been modeled assuming that these land uses would be made up of warehouses. Review of the CalEEMod output files provided in Appendix C of the DSEIR, however, demonstrates that no warehousing land use type was used when modeling emissions. Rather, the proposed warehouse land uses were modeled as General Light Industry (see excerpt below) (Appendix C, pp. 123).

Land Uses	Size	Metric	Lot Acreage
General Light Industry	14,705.00	1000sqft	487.90
Office Park	319.90	1000sqft	25.50
General Office Building	923.70	1000sqft	92.60
Regional Shopping Center	1,128.40	1000sqft	53.20
Single Family Housing	380.00	Dwelling Unit	47.50
Condo/Townhouse	882.00	Dwelling Unit	44.50
City Park	25.00	Acre	25.00
Elementary School	100.00	Employee	13.00
Parking Lot	16.10	Acre	16.10
Other Asphalt Surfaces	299.40	Acre	299.40

By failing to account for the proposed warehouse land uses, the RSPA's operational emissions are greatly underestimated. According to the CalEEMod User's Guide, the land uses, size features, and population are used throughout CalEEMod in determining default variables and calculations.[5] Therefore, by relying upon a land use type that is not representative of the RSPA's warehouse land uses, any default variables and calculations relied upon by the Project applicant within the model are

[5] CalEEMod User's Guide, p. 14, *available at:* http://www.caleemod.com/

incorrect, and would result in incorrect emission estimates. As a result, the DSEIR's CalEEMod model for the RSPA should not be relied upon to determine Project significance. An updated air quality analysis should be prepared to adequately evaluate the air quality impacts of the proposed warehouse land uses within the RSPA, and additional mitigation should be identified and incorporated, where necessary. **OR1-31 Cont.**

Failure to Consider Cold-Storage Requirements for Warehouse Buildings

Because the DSEIR fails to account for the proposed warehouse land uses within the CalEEMod model, emissions from refrigerated warehouses are also unaccounted for. Assuming that the proposed warehouse land uses will not require any sort of refrigeration and/or cold storage, however, is inconsistent with information disclosed in the DSEIR, the 2010 Approved DEIR, and the 2010 Approved FEIR. As a result, the Project's operational emissions may be grossly underestimated.

As previously stated, the RSPA proposes the relocation of business and industrial uses to the west of Linden Avenue, the relocation of all residential land uses and the public park to the east side of Linden Avenue, and the implementation of the Renaissance Marketplace retail development and the Planning Area 108 industrial/warehouse development (DSEIR, p. 1-2). Therefore, with the exception of the Renaissance Marketplace and the Planning Area 108 development, it can be reasonably assumed that the RSPA's land uses are, more or less, similar to the RSP's land uses. As a result, information disclosed in the 2010 Approved DEIR and the 2010 Approved FEIR for the RSP can also be used to provide some insight on the RSPA's land uses.

OR1-32

According to the 2010 Approved DEIR and 2010 Approved FEIR, the previously approved RSP proposed to implement mitigation to reduce emissions from refrigerated warehouses and trucks equipped with transportation refrigeration units (TRU), which are needed to transfer refrigerated and frozen items to and from the site (p. 1-10). Mitigation Measure AQ-12 of the 2010 Approved DEIR and FEIR states,

> "A minimum of ten percent of the loading docks for the warehouse/distribution center uses shall contain outdoor electrical hook-up sources for service equipment and trucks such as transportation refrigeration units. In addition, electrical hookups shall be provided at the loading docks located at refrigerated warehouses for transportation refrigeration units visiting these locations. All trucks with transportation refrigeration units are required to connect to the electrical hookups while loading or unloading deliveries to the proposed project. Trucks with transportation refrigeration units are prohibited from accessing refrigerated warehouses unless they have the capability to connect to the electrical hookups" (DEIR, Table 1-1, p. 1-10; FEIR, Table 1-1, p. 3-24).

Furthermore, the 2010 Approved DEIR also assumed that approximately 11 percent of the total warehouse floor space for the previously approved RSP (approximately 1,023,112 SF) would be used for cold storage (p. 4.17-35). The fact that the 2010 Approved DEIR and FEIR proposed to equip the loading docks at refrigerated warehouses with electrical hookups for TRU trucks, and the fact that the 2010 Approved DEIR assumed that 11 percent of the total warehouse uses would require cold storage indicates that not only will there be refrigerated warehouses on-site, but that TRU trucks will also be traveling to and from the site during Project operation.

In addition to the information provided in the 2010 Approved DEIR and FEIR, the 2016 DSEIR also indicates that refrigeration may be required on-site for the proposed warehouse land uses. According to the DSEIR, the RSPA will be compliant with measures set forth by the California Air Resources Board (CARB) regarding industrial refrigeration and mobile-source refrigerants (p. 4.4-25, 4.4-27). This indicates that industrial refrigeration and mobile-source refrigerants could potentially be located on-site, and will comply with standards set forth by CARB. As a result, it can be reasonably assumed that at least a portion of the proposed warehouse land uses within the RSPA will be made up of refrigerated warehouses.

OR1-32 Cont.

By modeling the Project's emissions assuming that no refrigerated warehouses will operate on-site, the DSEIR greatly underestimates the actual emissions that would occur once the RSPA is operational. Refrigerated warehouses release more air pollutants and greenhouse gas (GHG) emissions when compared to unrefrigerated warehouses for several reasons. First, warehouses equipped with cold storage (refrigerators and freezers, for example) are known to consume more energy when compared to warehouses without cold storage.[6] Second, warehouses equipped with cold storage typically require refrigerated trucks, which are known to idle for much longer, even up to an hour, when compared to unrefrigerated hauling trucks.[7] Lastly, according to a July 2014 *Warehouse Truck Trip Study Data Results and Usage* presentation prepared by the SCAQMD, it was found that hauling trucks that require refrigeration result in greater truck trip rates when compared to non-refrigerated hauling trucks.[8]

As discussed by SCAQMD, "CEQA requires the use of 'conservative analysis' to afford 'fullest possible protection of the environment.'"[9] As a result, the most conservative analysis should be conducted. With this in mind, because the DSEIR, the 2010 Approved DEIR, and the 2010 Approved FEIR indicate the need for refrigerated warehouses, the proposed warehouse land uses should be modeled as "Refrigerated Warehouse-No Rail," or at the very least, a portion of the warehouse land uses should be modeled as "Refrigerated Warehouse-No Rail," with the remaining portion of the buildings modeled as "Unrefrigerated Warehouse-No Rail," so as to take into consideration the possibility that the warehouses will use both cold storage and non-cold storage.

By not including refrigerated warehouses as a potential land use in the CalEEMod model, the Project's operational emissions may be grossly underestimated. Unless the Project Applicant can demonstrate that the proposed warehouse buildings will be limited to unrefrigerated warehouse uses, exclusively, it

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[6] Managing Energy Costs in Warehouses, Business Energy Advisor, *available at*: http://bizenergyadvisor.com/warehouses

[7] "Estimation of Fuel Use by Idling Commercial Trucks," p. 8, *available at:* http://www.transportation.anl.gov/pdfs/TA/373.pdf

[8] "Warehouse Truck Trip Study Data Results and Usage" Presentation. SCAQMD Mobile Source Committee, July 2014, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/finaltrucktripstudymsc072514.pdf?sfvrsn=2, p. 7, 9

[9] "Warehouse Truck Trip Study Data Results and Usage" Presentation. SCAQMD Inland Empire Logistics Council, June 2014, *available at*: http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/final-ielc_6-19-2014.pdf?sfvrsn=2

should be assumed that a mix of cold and non-cold storage will be provided on-site. An updated DSEIR should be prepared to account for the possibility of refrigerated warehouse needs by future tenants. **OR1-32 Cont.**

Use of Incorrect Truck Trip Rate

The DSEIR's CalEEMod model also fails to apply a site-specific truck trip rate to the proposed warehouse land uses within the RSPA. Rather, the DSEIR relies upon an unsubstantiated trip rate to estimate the proposed warehouse emissions, which results in an underestimation of the number of truck trips these warehouses will generate once operational. This underestimation presents a significance issue, as truck emissions represent more than 90 percent of air quality impacts from these types of projects. [10] Furthermore, by failing to apply a site-specific truck trip rate to the proposed warehouse land uses within the RSPA, the DSEIR is inconsistent with guidance set forth by the SCAQMD as well as with information provided in other technical studies conducted for the Project. As a result, the RSPA's operational mobile-source emissions are greatly underestimated.

The SCAQMD is currently the leading air quality management district in assessing and analyzing the air quality impacts that result from heavy-duty truck trips generated by warehouse projects within Sothern California.[11] The SCAQMD recommends the use of the Institute of Transportation Engineers Trip Generation Manual, 9th Edition, 2012 (ITE Manual) in conjunction with their truck mix by axle-type to better quantify trip rates associated with local warehouse and distribution projects. According to the ITE Manual, an overall vehicle trip rate of 3.56 trips per thousand square feet (trips/TSF) should be used for Warehouse land uses (Land Use Code 150), which is consistent with the trip rate used in the DSEIR's Traffic Impact Analysis (Table 2-A, pp. 41).[12] Furthermore, according to the DSEIR's Traffic Impact Analysis, a passenger car trip rate of 2.136 trips/TSF should also be used for the proposed warehouse land uses (Table 2-A, pp. 41). When these trip rates are utilized, we find that the RSPA's warehouse land uses would generate approximately 31,410 passenger car trips and approximately 20,881 truck trips for a total of 52,291 trips per day (see table below). **OR1-33**

Table 1: SWAPE Updated Daily Vehicle Trips

Land Use	Building Area (SF)	Vehicle Type	Total Number of Daily Trips
Warehouse ITE 150	14,705,000	Passenger Car (LDA)	31,410
		Truck (LHD1, MHD, HHD)	20,881
		SWAPE Total[1]	**52,291**

[1] Total is equal to the number of passenger car (LDA) and truck (LHD1, MHD, HHD) trips. Any other vehicle type was omitted from table.

[10] Warehouse Truck Trip Study Data Results and Usage, SCAQMD, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/finaltrucktripstudymsc072514.pdf?sfvrsn=2, p. 2

[11] High Cube Warehouse Trip Rate Study for Air Quality Analysis, SCAQMD, *available at:* http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/high-cube-warehouse

[12] Institute of Transportation Engineers Trip Generation Manual, 9th Edition, 2012, p. 267

OR1-33 Cont.

Therefore, using the recommendations set forth by the SCAQMD and values provided in the DSEIR's Traffic Impact Analysis, the DSEIR should have used the same daily vehicle and truck trip rates as described in the table above. When we reviewed Appendix C of the DSEIR, however, we found that the CalEEMod model relied upon an overall trip rate of 3.191 trips/TSF to estimate the number of daily vehicle and truck trips the warehouse land uses would generate during operation, which is not only inconsistent with the DSEIR's Traffic Impact Analysis, but is also inconsistent with the trip rate set forth by the Institute of Transportation Engineers for Warehouse land uses (ITE 150 Warehouse) (DSEIR, Appendix C, pp. 124). When this incorrect trip rate is used, the proposed warehouse land uses would generate approximately 22,139 passenger car trips (LDA) and approximately 5,336 truck trips (LHD1, MHD, HHD), for a combined total of 27,475 trips per day (see table below).

Table 2: DSEIR Daily Vehicle Trips

Land Use	Building Area (SF)	Vehicle Type	Total Number of Daily Trips
Warehouse ITE 150	14,705,000	Passenger Car (LDA)	22,139
		Truck (LHD1, MHD, HHD)	5,336
		DSEIR Total[1]	**27,475**

[1] Total is equal to the number of passenger car (LDA) and truck (LHD1, MHD, HHD) trips. Any other vehicle type was omitted from table.

As you can see in the tables above, the DSEIR's CalEEMod model underestimates the warehouses' number of daily trips made by passenger cars and trucks by 24,816 trips, or approximately 9 million trips per year. By using the incorrect trip rates, the DSEIR inaccurately estimates the number of passenger car and truck trips the RSPA's warehouse land uses will generate during operation.

Use of Incorrect Truck Fleet Mix

OR1-34

The DSEIR's CalEEMod model also fails to apply a site-specific truck fleet mix to the proposed warehouse land uses within the RSPA. Rather, the DSEIR and associated Air Quality Report rely upon the CalEEMod default fleet mix to estimate emissions from the proposed warehouse uses, which underestimate the percent of total trips that will be made by trucks during operation. As previously stated, this underestimation presents a significance issue, as heavy duty truck emissions represent more than 90 percent of air quality impacts from these types of projects. As a result, the RSPA's operational mobile-source emissions are greatly underestimated.

The SCAQMD recommends that lead agencies assume a truck fleet mix of 40%. According to *Appendix E: Technical Source Documentation* of the CalEEMod User's Guide, "in order to avoid underestimating the number of trucks visiting warehouse facilities," SCAQMD staff "recommends that lead agencies conservatively assume that an average of 40% of total trips are truck trips."[13] This 40% truck fleet percentage is also used in the DSEIR's Traffic Impact Analysis to estimate the number of truck trips the RSPA's proposed warehouse land uses would generate (Table 2-A, pp. 41). Therefore, in an effort to

[13] "Appendix E Technical Source Documentation." CalEEMod User's Guide, July 2013, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/high-cube-resource-caleemod-appendix-e.pdf?sfvrsn=2, pp. 15

remain consistent with guidance set forth by the SCAQMD, and with information used in other technical studies for the proposed Project, a truck fleet percentage of 40% should have been used to estimate the RSPA's warehouse emissions.

Review of the DSEIR's CalEEMod output files, however, demonstrates that a truck fleet (LHDT1, MHD, and HHDT) percentage of approximately 11% was used, rather than the 40% value recommended by the SCAQMD (DSEIR, Appendix C, pp. 129). As a result, the RSPA's warehouse truck emissions are greatly underestimated.

OR1-34 Cont.

This 40% truck fleet mix is further broken down by the SCAQMD according to axle type, in order to accurately estimate the amount and types of trucks that will be accessing the proposed warehouses once operational. Specifically, the SCAQMD recommends that the following truck fleet mix be used for large warehouse projects: 22% of the total trucks as 2-axle trucks, 17.7% of the total trucks as 3-axle trucks, and 60.3% of the total trucks as 4+-axle trucks (see table below). [14]

SCAQMD Recommended Fleet Mix	
Truck Type	**Fleet Mix (%)**
4+ Axle Trucks (HHDT)	60.3%
3 Axle Trucks (MHD)	17.7%
2 Axle Trucks (LHDT1)	22.0%
Total	**100.0%**

OR1-35

Therefore, the DSEIR should have also used these recommended truck mix percentages, as it provides a more project-specific estimation of the types of trucks that will most likely travel to and from the site during Project operation. Review of the CalEEMod model, however, demonstrates that the truck fleet mix percentages set forth by the SCAQMD were not used within the CalEEMod model (DSEIR, Appendix C, pp. 129). Rather, the model relies upon CalEEMod default fleet mix percentages to estimate the Project's emissions. Specifically, we find that the DSEIR uses the following truck fleet mix to model emissions: 49.2% of the total trucks as 2-axle trucks, 14.6% of the total trucks as 3-axle trucks, and 36.1% of the total trucks as 4+-axle trucks (see table below) (DSEIR, Appendix C, pp. 129).

DSEIR Fleet Mix	
Truck Type	**Fleet Mix (%)**
4+ Axle Trucks (HHDT)	36.1%
3 Axle Trucks (MHD)	14.6%
2 Axle Trucks (LHDT1)	49.2%
Total	**100.0%**

[14] "Appendix E Technical Source Documentation." CalEEMod User's Guide, July 2013, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/high-cube-resource-caleemod-appendix-e.pdf?sfvrsn=2, pp. 15

OR1-35 As you can see in the tables above, the DSEIR underestimates the total number of HHD trucks by approximately 20%, underestimates the total number of MHD trucks by approximately 4%, and then over estimates the total number of LHDT1 trucks, which are the smallest, lowest emitting truck type of the three truck categories, by approximately 30%. By failing to utilize the warehouse-specific truck trip fleet mix set forth by the SCAQMD, the DSEIR underestimates the total number of heavy-duty and medium-duty truck trips the Project will generate during operation, and as a result, the Project's operational emissions are underestimated.

Use of Incorrect Truck Trip Length

Finally, the DSEIR relies upon an incorrect truck trip length to model emissions from the RSPA's warehouse land uses. Rather, the DSEIR and associated Air Quality Report rely upon the CalEEMod default trip lengths to estimate emissions from the proposed warehouse uses, which underestimate the total miles traveled by the trucks accessing the RSPA's warehouses on a daily basis. Therefore, truck trip lengths set forth by the SCAQMD should have been used to estimate the RSPA's warehouse land use truck emissions, rather than the CalEEMod default values, as it provides a more realistic, site-specific trip length that trucks visiting the site will most likely travel. Furthermore, other CEQA evaluations for similar projects located near the Project site utilize SCAQMD recommended truck trip lengths to estimate project emissions. Therefore, it is reasonable for the proposed warehouse land uses to rely upon SCAQMD truck trip lengths as well.

OR1-36 The DSEIR relies upon a CalEEMod default commercial-work (C-W) trip length of 16.6 miles, a CalEEMod default trip length of 8.4 miles for commercial-customer (C-C), and a CalEEMod default trip length of 6.9 miles for commercial-nonwork (C-NW) trips (see excerpt below) (Appendix C, pp. 128).

	Miles			Trip %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW
General Light Industry	16.60	8.40	6.90	59.00	28.00	13.00
City Park	16.60	8.40	6.90	33.00	48.00	19.00
Condo/Townhouse	14.70	5.90	8.70	40.20	19.20	40.60
Elementary School	16.60	8.40	6.90	65.00	30.00	5.00
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00
Office Park	16.60	8.40	6.90	33.00	48.00	19.00
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00
Single Family Housing	14.70	5.90	8.70	40.20	19.20	40.60

As you can see in the excerpt above, the RSPA's operational trips are allocated to either the C-W, C-C, or C-NW trip categories. According to Appendix A of the CalEEMod User Guide, the C-W represents trips made by an employee of the commercial land use sector while C-NW represents other trips associated

with the land use besides those made by customers or workers, such as delivery vehicles.[15] Therefore, the DSEIR's CalEEMod model assumes that the heavy-duty trucks responsible for delivering goods to and from the Project site will have a trip length of 6.9 miles. The use of a 6.9-mile trip length, however, is entirely incorrect, as it greatly underestimates the trip length that heavy-duty trucks will most likely travel during operation. Furthermore, the use of this truck trip length is also inconsistent with trip lengths used for similar warehouse projects within southern California and the County of San Bernardino. As a result, the Project's operational emissions are greatly underestimated. **OR1-36 Cont.**

For example, the Kimball Business Park Project, which proposes to construct approximately 1,203,050 square feet of warehouse and light industrial/business park uses within the City of Chino, uses a truck trip length of approximately 50 miles to estimate the Project's operational mobile-source emissions. The Air Quality Impact Analysis states,

> "In the last five years, the SCAQMD has provided numerous comments on the trip lengths for warehouse/distribution and industrial land use projects (33). The SCAQMD asserts that the model-default trip lengths in CalEEMod™ and the URBan EMISsions (URBEMIS) 2007 model (version 9.2.4) would underestimate emissions. The SCAQMD asserts that for warehouse, distribution center, and industrial land use projects, most of the heavy-duty trucks would be hauling consumer goods, often from the Port of Long Beach and Los Angeles (POLA and POLB) and/or to destinations outside of California. The SCAQMD states that for this reason, the CalEEMod™ and the URBan EMISsions model default trip length (approximately 12.6 miles) would not be representative of activities at like facilities. The SCAQMD generally recommends the use of a 40-mile one-way trip length".[16]

OR1-37

Therefore, at the very least, the DSEIR should have used a one-way truck trip length of at least 40 miles for the RSPA's warehouse land uses, as it is consistent with guidance set forth by the SCAQMD as well as with the trip lengths used in other air quality analyses for similar warehouse projects located near the proposed Project.

This conclusion is further supported by the SCAQMD's comments on the Mitigated Negative Declaration (MND) for the Waterman Logistic Center Project. The Waterman Logistic Center proposes to construct a 426,858 square feet of logistics warehouse buildings within the City of San Bernardino, which is only approximately 45 miles from proposed Project.[17] The Waterman Logistic Center's Air Quality Study utilized an internal truck trip length of 24.11 miles in accordance with the Southern California Association of Government Heavy Duty Truck Model. The SCAQMD, however, finds issue with this trip length, stating that most industrial land use types haul consumer goods from the Ports of Long Beach

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[15] "Appendix A- Calculation Details for CalEEMod." CalEEMod User Guide, p. 20, *available at:* http://www.caleemod.com/

[16] Kimball Business Park Air Quality Impact Analysis, Urban Crossroads, *available at:* http://www.cityofchino.org/government-services/community-development/environmental-documents

[17] SCAQMD Comment Letter on the Mitigated Negative Declaration (RDEIR) for the Proposed Waterman Logistics Center, January 8 2015, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/january/mndwaterman.pdf

and Los Angeles as well as locations outside the SCAQMD boundaries, including Banning Pass, San Diego County line, and Cajon Pass (see excerpt below).

- Project site to Port of Los Angeles/Long Beach: 74 miles
- Project site to Banning Pass: 38 miles
- Project site to San Diego County line: 55 miles
- Project site to Cajon Pass: 24 miles
- Project site to downtown Los Angeles: 60 miles

OR1-37 Cont.

As you can see in the excerpt above, the trip lengths from the Waterman Logistics Center project site to each of the locations listed by the SCAQMD are well over the 24.11-mile trip length, with the exception of Cajon Pass. Using SCAQMD's recommended methodology, "Assuming that 50 percent of all delivery trips will travel to and from the project and the Port of Los Angeles/Long Beach, the use of 24.11 miles as an average internal truck trip greatly underestimates the air quality impact."[18] Considering the fact that a trip length of 6.9 miles used in the DSEIR is much shorter than the 24.11-mile trip length used for the Waterman Project, and considering the fact that the SCAQMD still found the 24.11-mile trip length to be inadequate, we can reasonably assume the trip length utilized for the proposed Project is significantly shorter than the actual trip length that trucks will be using once the Project is in operation. Therefore, it is incorrect to assume that all trucks traveling to and from the site will be hauling consumer goods strictly within a 6.9-mile radius.

In order to ensure that the DSEIR conservatively evaluates the potential for air quality impacts, the Lead Agency should utilize a trip length that is reflective of the potential truck trips, such as a trip length of 40 miles as recommended by the SCAQMD, or the Lead Agency should limit the truck trip miles allowed to levels analyzed in the DSEIR. By failing to use site specific values, the Project's truck trip lengths are significantly underestimated, and as a result, the Project's operational emissions are greatly underestimated.

Updated Analysis Indicates Increase in Pollutant Emissions

OR1-38

In an effort to accurately estimate the RSPA's warehouse land use emissions, we prepared three updated air models using the most recent CalEEMod version, CalEEMod.2013.2.2 – one to model warehouse emissions from Passenger Cars (LDA), one to model warehouse emissions from heavy duty trucks, and one to model emissions from the remaining land uses within the RSPA, excluding the proposed warehouse uses. Since it is unknown how many tenants will require cold-storage, we conservatively assumed that approximately 15 percent of the proposed warehouse buildings will be made up of refrigerated warehouses. This percentage is consistent with studies conducted by the SCAQMD on composite warehouses within southern California[19] and is consistent with assumptions

[18] *Ibid.,* p. 4.

[19] "Warehouse Truck Trip Study Data Results and Usage," SCAQMD Stakeholder Working Group, July 17, 2014, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/finalswg071714.pdf?sfvrsn=2, p. 15

used in other CEQA evaluations prepared for similar projects.[20] We utilized an overall trip rate of 3.56 trips per thousand square foot for both the refrigerated and unrefrigerated land uses, which reflects the updated trip rate provided by the 9th Edition ITE Trip Generation Manual for warehousing land uses (ITE Land Use Code 150). Consistent with the SCAQMD, we assumed that 40% of the warehouse vehicle trips would be made by trucks, and we applied the SCAQMD recommended truck fleet mix by axle type (LHDT1, MHD, and HHDT). Furthermore, we increased the operational truck trip length from 6.90 miles to 40 miles, which is consistent with recommendations set forth by the SCAQMD, and we relied upon the CalEEMod default passenger car trip length of 16.60 miles.

When correct input parameters are used to model emissions from the proposed warehouse land uses, we find that the RSPA's peak operational criteria air pollutant emissions not only exceed SCAQMD regional thresholds, but these emissions also increase significantly when compared to the DSEIR's RSPA model (see table below).

OR1-38 Cont.

Summary of Peak Operational Emissions - Summer						
Operational Activities	**Emissions (pounds per day)**					
	ROG	**NOX**	**CO**	**SOX**	**PM10**	**PM2.5**
RSPA (Excluding Warehouse Land Uses)	694	572	2,302	5	337	97
Warehouse Area Source	385	0	2	0	0	0
Warehouse Energy Source	3	30	25	0	2	2
Warehouse Mobile (Trucks)	444	7,587	4,303	24	850	317
Warehouse Mobile (Passenger Cars)	79	103	1,510	4	398	107
SWAPE's Total Maximum Daily Emissions	**1,604**	**8,291**	**8,143**	**33**	**1,587**	**523**
DSEIR's Total Maximum Daily Emissions	**1,291**	**1,409**	**5,065**	**13**	**798**	**234**
SCAQMD Regional Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Thresholds Exceeded?	***Yes***	***Yes***	***Yes***	***Yes***	***Yes***	***Yes***

Summary of Peak Operational Emissions - Winter						
Operational Activities	**Emissions (pounds per day)**					
	ROG	**NOX**	**CO**	**SOX**	**PM10**	**PM2.5**
RSPA (Excluding Warehouse Land Uses)	687	596	2,179	5	337	97
Warehouse Area Source	385	0	2	0	0	0
Warehouse Energy Source	3	30	25	0	2	2
Warehouse Mobile (Trucks)	453	7,910	4,585	24	850	317
Warehouse Mobile (Passenger Cars)	73	109	1,265	4	398	107
SWAPE's Total Maximum Daily Emissions	**1,601**	**8,645**	**8,056**	**33**	**1,588**	**524**
DSEIR's Total Maximum Daily Emissions	**1,277**	**1,465**	**4,703**	**12**	**798**	**234**
SCAQMD Regional Thresholds	**55**	**55**	**550**	**150**	**150**	**55**

[20] Kimball Business Park Air Quality Impact Analysis, Urban Crossroads, *available at:* http://www.cityofchino.org/government-services/community-development/environmental-documents

Thresholds Exceeded?	*Yes*	*Yes*	*Yes*	*Yes*	*Yes*	*Yes*

OR1-38 Cont.

As you can see in the tables above, ROG emissions increase by approximately 25%, NO_x emissions increase by approximately 490%, SO_x emissions increase by approximately 65%, PM_{10} emissions increase by approximately 99%, and $PM_{2.5}$ emissions increase by approximately 124% for both summer and winter seasons. These updated emission estimates demonstrate that when the RSPA's warehouse emissions are estimated correctly, the Project would result in substantially more severe significant effects than what was previously examined in both the 2010 EIR, as well as the 2016 DSEIR (DSEIR, p. 2-3). As a result, an updated DSEIR should be prepared that includes an updated model to adequately estimate the Project's operational warehouse emissions, and additional mitigation measures should be incorporated in an effort to reduce the Project's emissions to a less-than-significant level.

Diesel Particulate Matter Health Risk Emissions Inadequately Evaluated

OR1-39

The DSEIR concludes that the Project would not expose sensitive receptors to substantial pollutant concentrations and therefore would have a less than significant impact, yet fails to actually quantify this risk and compare it to applicable thresholds (p. 4.2-28). The DSEIR attempts to justify the omission of an actual health risk assessment by analyzing construction and operational emissions for the Renaissance Marketplace and Planning Area 108 against the SCAQMD's Localized Significance Thresholds (LST) to determine whether the Project would expose sensitive receptors to substantial pollutant concentrations (p. 4.2-28). Using this method, the DSEIR states that "the localized impact analysis concluded that the Project's emissions would not exceed the SCAQMD's LSTs for any pollutant during construction and/or operational activities" (p. 4.2-28). While the LST method assesses the impacts of pollutants at a local level, it only evaluates impacts from criteria air pollutants. As a result, health impacts from exposure to toxic air contaminants (TACs), such as diesel particulate matter (DPM), were not analyzed, thus leaving a gap within DSEIR's analysis.

According to the Final Localized Significance Threshold Methodology document prepared by the SCAQMD, the LST analysis is only applicable with NO_x, CO, PM10, and PM2.5 emissions, which are collectively referred to as criteria air pollutants.[21] Because the LST method can only be applied to criteria air pollutants, this method cannot be used to determine whether emissions from diesel particulate matter (DPM), a known human carcinogen, will result in a significant health risk impact to nearby sensitive receptors. By failing to prepare a health risk assessment in addition to the LST analysis, the DSEIR fails to provide a comprehensive analysis of the sensitive receptor impacts that may occur as a result of exposure to substantial air pollutants. Furthermore, the SCAQMD provides a specific numerical threshold of 10 in one million for determining a project's health risk impact, which supports the requirement of a health risk assessment in addition to the LST analysis. Therefore, the DSEIR should

[21] "Final Localized Significance Threshold Methodology." SCAQMD, Revised July 2008, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf

have conducted an assessment that compares both the Renaissance Marketplace and Planning Area 108's health risk to this threshold in order to determine their health risk impact.

Not only is the omission of a health risk assessment inconsistent with guidance set forth by the SCAQMD, but it is also inconsistent with requirements set forth by the 2010 DEIR for the previously approved RSP. The 2010 Renaissance Specific Plan DEIR states,

> "… because of uncertainties in the estimation of the health impacts associated with DPM emissions related to the amount of warehouse development that will ultimately occur in the Project area, as well as the location and proximity of warehouses to residential uses and other sensitive receptors, impacts could be significant without mitigation. Mitigation Measure AQ-14, which required site specific analysis for project level development proposals, is required to ensure that any nearby sensitive receptors are not adversely impacted by the DPM emissions generated by the operation of the Proposed Project" (p. 4.3-36).

OR1-39 Cont.

Therefore, in an effort to remain consistent with the mitigation requirements set forth by the 2010 DEIR, at the very least the risk associated with Planning Area 108, which proposes to develop multiple warehouses, must also be quantified and compared to the 10 in one million threshold to ensure that any nearby sensitive receptors are not adversely impacted by DPM emissions.

By failing to prepare a health risk assessment, the DSEIR is inconsistent with the Renaissance Specific Plan, as well as with recommendations set forth by the SCAQMD. As previously stated in the sections above, the DSEIR failed to provide the CalEEMod output files the Renaissance Marketplace and Planning Area 108 projects. As a result, we are unable to prepare our own, independent health risk assessment. Therefore, an updated DSEIR must be prepared to include a project level health risk assessment that evaluates the risk associated with DPM for the Renaissance Marketplace, Planning Area 108, and any subsequent projects proposed as part of the RSPA.

Greenhouse Gas

Failure to Adequately Determine Project Significance

The DSEIR concludes that the proposed Project would not result in a new significant greenhouse gas (GHG) impact when compared to the previously approved RSP, yet fails to provide valid justification for this conclusion (p. 4.4-12). When we reviewed the DSEIR's greenhouse gas analysis, we found that the proposed RSPA would result in a significant effect that will be substantially more severe than previously shown in the previous EIR, contrary to the conclusion made in the DSEIR. As a result, the significance determination made within the DSEIR is incorrect and unreliable. An updated DSEIR should be prepared to adequately evaluate the RSPA's GHG impact, and additional mitigation measures should be incorporated, where necessary.

OR1-40

Table 4.4-2 of the DSEIR shows the GHG emissions from the approved RSP and the currently proposed RSPA (p. 4.4-12). According to this table, the approved RSP would generate approximately 180,000 metric tons of carbon dioxide equivalents per year (MT CO_2e/year), and the RSPA would generate approximately 270,000 MT CO_2e/year (see excerpt below) (p. 4.4-12).

OR1-40 Cont.

Table 4.4-2 Long-Term Operational GHG Emissions – 2010 Approved RSP and Proposed RSPA

Source	Pollutant Emissions (MT/yr)					
	Bio-CO_2	NBio-CO_2	Total CO_2	CH_4	N_2O	CO_2e
2010 Approved RSP						
Approved RSP Total Emissions	**5,600**	**160,000**	**170,000**	**390**	**3.6**	**180,000**
SCAQMD Recommended Tier 4Threshold for an 18,785 SP						**90,170**
Exceed SCAQMD Recommended GHG Emissions Threshold?						**Yes**
Proposed RSPA						
Area Sources	0	320	320	0.028	0.0056	330
Energy Sources	0	86,000	86,000	3.2	1.1	87,000
Mobile Sources	0	150,000	150,000	5.8	0	150,000
Waste Sources	4,400	0	4,400	260	0	9,800
Water Usage	1,200	15,000	16,000	120	3.1	20,000
Proposed RSPA Total Emissions	**5,600**	**250,000**	**260,000**	**390**	**4.2**	**270,000**
SCAQMD Recommended Tier 4 Threshold for a 17,844 SP						**3,000**
Exceed SCAQMD Recommended GHG Emissions Threshold?						**Yes**
Net Change	**0**	**90,000**	**90,000**	**0**	**0.6**	**90,000**
New Significant Impacts?						**No**

Source: Compiled by LSA Associates, Inc. (2015).
Note: Numbers in table may not appear to add up correctly due to rounding of all numbers to two significant digits.
Bio-CO_2 = biologically generated CO_2
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
GHG = greenhouse gas
MT/yr = metric tons per year
N_2O = nitrous oxide
NBio-CO_2 = Non-biologically generated CO_2
RSP = Renaissance Specific Plan
RSPA = Renaissance Specific Plan Amendment
SCAQMD = South Coast Air Quality Management District

Taking the net difference in emissions between these two projects, the DSEIR finds that the RSPA will result in an additional 90,000 MT CO_2e/year when compared to the Approved 2010 RSP. Using the results of this analysis, the DSEIR concludes that the RSPA would not result in a new significant impact because the approved 2010 RSP already identified a significant GHG impact (p. 4.4-12). This conclusion, however, is incorrect. Even though the RSP already identified a significant GHG impact, the additional emissions that the RSPA would generate still represent a significant effect that will be substantially more severe than previously shown in the 2010 approved EIR. When compared to the RSP's emissions, this increase of 90,000 MT CO_2e/year represents a 50% increase from what was previously approved in 2010 (see table below).

Project	Greenhouse Gas Emissions (MT CO_2e/yr)
Approved 2010 RSP	180,000
RSPA	270,000
Net Increase	**90,000**
Percent Increase	***50%***

Furthermore, when the RSPA's emissions are compared to currently established thresholds, we find that these additional emissions, alone, would greatly exceed. For example, the RSPA's emissions of 90,000 MT CO_2e/yr would be 30 times greater than the 3,000 MT CO_2e/yr threshold recommended by the

SCAQMD for mixed-use developments, and would be nine times greater than the highest threshold established by the SCAQMD of 10,000 MT CO_2e/yr for industrial facilities.[22] [23]

Our analysis demonstrates that the RSPA's additional emissions, alone, would greatly exceed established thresholds. Therefore, to simply dismiss these additional emissions as less than significant is absolutely absurd, as it would result in a significant increase in emissions when compared to the previously approved 2010 RSP. An updated DSEIR should be prepared to adequately evaluate the RSPA's GHG impact, and additional mitigation measures should be incorporated, where necessary. **OR1-40 Cont.**

Air Quality and Greenhouse Gas

Failure to Implement All Feasible Mitigation Measures

The DSEIR concludes that the Project's VOC, NO_x, CO, PM_{10}, $PM_{2.5}$ and greenhouse gas (GHG) emissions would be significant and unavoidable, yet fails to implement all feasible mitigation measures to the maximum extent possible (p. 1-3). While we agree that the Project would result in a significant individual air quality and GHG impact, we do not agree with the DSEIR's conclusion that these impacts are "significant and unavoidable." An impact can only be labeled as significant and unavoidable after all available, feasible mitigation is considered. According to the CEQA Guidelines and as stated by the San Joaquin Valley Air Quality Management District,

> "CEQA requires Lead Agencies to mitigate or avoid significant environmental impacts associated with discretionary projects. Environmental documents for projects that have any significant environmental impacts must identify all feasible mitigation measures or alternatives to reduce the impacts below a level of significance. If after the identification of all feasible mitigation measures, a project is still deemed to have significant environmental impacts, the Lead Agency can approve a project, but must adopt a Statement of Overriding Consideration to explain why further mitigation measures are not feasible and why approval of a project with significant unavoidable impacts is warranted." [24]

OR1-41

Therefore, an impact can only be labeled as significant and unavoidable after all available, feasible mitigation is considered. Review of the Project's air quality and GHG mitigation measures, however, demonstrates that not all feasible mitigation is being implemented. As a result, additional mitigation measures should be identified and incorporated in order to reduce the Project's individual and cumulative impacts to the maximum extent possible. Until all feasible mitigation is reviewed and incorporated into the Project design, impacts from operational VOC, NO_x, CO, PM_{10}, $PM_{2.5}$, and GHG emissions cannot be considered as significant and unavoidable.

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[22] http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2

[23] http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-%28ghg%29-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf?sfvrsn=2

[24] http://www.valleyair.org/transportation/GAMAQI_3-19-15.pdf, p. 115 of 125

We identified several additional mitigation measures that the DSEIR and 2010 EIR for the previously approved RSP failed to incorporate, which would further reduce the Project's operational VOC, NO_x, CO, PM_{10}, $PM_{2.5}$, and GHG emissions, potentially to a less-than-significant level. Additional mitigation measures that could be implemented include, but are not limited to, the following: [25]

- Use Zero-VOC emission paints;
  - The Project Applicant should consider the use of zero-VOC emission paints, which has been required for numerous projects that have undergone CEQA review. Zero-VOC emission paints are commercially available. Other low-VOC standards should be incorporated into mitigation including use of "super-compliant" paints, which have a VOC standard of less than 10 g/L.
- Use material that does not require paint;
  - Using materials that do not require painting is a common mitigation measure where VOC emissions are a concern. Interior and exterior surfaces, such as concrete, can be left unpainted.

OR1-42

- Use spray equipment with greater transfer efficiencies;
  - Various coatings and adhesives are required to be applied by specified methods such as electrostatic spray, high-volume, low-pressure (HVLP) spray, roll coater, flow coater, dip coater, etc. in order to maximize the transfer efficiency. Transfer efficiency is typically defined as the ratio of the weight of coating solids adhering to an object to the total weight of coating solids used in the application process, expressed as a percentage. When it comes to spray applications, the rules typically require the use of either electrostatic spray equipment or HVLP spray equipment. The SCAQMD is now able to certify HVLP spray applicators and other application technologies at efficiency rates of 65 percent or greater. [26]
- Use passive solar design, such as: [27,28]
  - Orient buildings and incorporate landscaping to maximize passive solar; heating during cool seasons, and minimize solar heat gain during hot seasons; and
  - Enhance natural ventilation by taking advantage of prevailing winds.
- Reduce unnecessary outdoor lighting by utilizing design features such as limiting the hours of operation of outdoor lighting.
- Develop and follow a "green streets guide" that requires:
  - Use of minimal amounts of concrete and asphalt;
  - Installation of permeable pavement to allow for storm water infiltration; and

[25] http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf
[26] http://www.aqmd.gov/home/permits/spray-equipment-transfer-efficiency
[27] Santa Barbara Air Pollution Control District, Scope and Content of Air Quality Sections in Environmental Documents, September 1997.
[28] Butte County Air Quality Management District, Indirect Source Review Guidelines, March 1997.

- Use of groundcovers rather than pavement to reduce heat reflection.[29]

- Implement Project design features such as:
  - Shade HVAC equipment from direct sunlight;
  - Install high-albedo white thermoplastic polyolefin roof membrane;
  - Install high-efficiency HVAC with hot-gas reheat;
  - Install formaldehyde-free insulation; and
  - Use recycled-content gypsum board.
- Provide education on energy efficiency to residents, customers, and/or tenants. Provide information on energy management services for large energy users. **OR1-42 Cont.**
- Meet "reach" goals for building energy efficiency and renewable energy use.
- Install solar, wind, and geothermal power systems and solar hot water heaters.
- Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on all building roofs and/or on the Project site to generate solar energy for the facility.
- Include energy storage where appropriate to optimize renewable energy generation systems and avoid peak energy use.
- Plant low-VOC emitting shade trees, e.g., in parking lots to reduce evaporative emissions from parked vehicles.
- Use CARB-certified or electric landscaping equipment in project and tenant operations; and introduce electric lawn, and garden equipment exchange program.
- Install an infiltration basin to provide an opportunity for 100% of the storm water to infiltrate on-site.

In addition to the measures discussed above, the SCAQMD has previously recommended additional mitigation measures for operational NO_x emissions that result primarily from truck activity emissions for similar projects. These measures would also effectively reduce the Project's operational VOC, NO_x, CO, PM_{10}, $PM_{2.5}$, and GHG emissions. In this case, these measures would apply to the Project's proposed industrial and commercial land uses. Measures recommended for the Waterman Logistic Center that are also applicable for this Project include[30]: **OR1-43**

- Provide electric vehicle charging stations that are accessible for trucks.
- Provide electrical hookups at the onsite loading docks and at the truck stops for truckers to plug in any onboard auxiliary equipment.
  - According to Mitigation Measure AQ-12 of the 2010 Approved FEIR, the Project proposes to equip only 10 percent of the loading docks for the warehouse/distribution center uses with these electrical hookups (p. 3-24). However, we require that this

[29] *See* Irvine Sustainable Travelways "Green Street" Guidelines; www.ci.irvine.ca.us/civica/filebank/blobdload.asp?BlobID=8934; and Cool Houston Plan; www.harc.edu/Projects/CoolHouston.

[30] SCAQMD Comment Letter in Response to MND for the Waterman Logistic Center, January 2018, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/january/mndwaterman.pdf

OR1-43 Cont.

measure be extended to all of the loading docks for the warehouse/distribution center uses, as well as all of the loading docks for all of the other proposed land uses, such as the commercial and retail uses.

- Require the proposed warehouse to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in.
- Limit the daily number of trucks allowed at the facility to levels analyzed in the DSEIR and 2010 EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level.
- Limit the truck trip miles allowed to levels analyzed in the DSEIR and 2010 EIR. If higher truck trip miles are anticipated or required, the Lead Agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level.
- Design the site such that any check-in point for trucks is well inside the facility to ensure that there are no trucks queuing outside of the facility.
- On-site equipment should be alternative fueled.
- Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to travel through residential neighborhoods.
- Improve traffic flow by signal synchronization.
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- Should the proposed Project generate significant emissions, the Lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in emissions, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts.

OR1-44

Finally, in addition to the measures described above, the DSEIR proposes to implement the following mitigation measures to reduce operational VOC, NO_x, CO, PM_{10}, $PM_{2.5}$, and GHG emissions for the proposed the Renaissance Market Place and Planning Area 108, exclusively (p. 1-7). Therefore, we propose that these mitigation measures also be extended to the entire RSPA in order to reduce emissions to the maximum extent feasible. These mitigation measures include:

- Prior to the issuance of building permits, the Project applicant shall submit to the satisfaction of the Public Works Director, evidence that development within the RSPA comply with Title 24 of the California Code of Regulations (CCR) established by the CEC regarding energy conservation and green buildings standards. The Project applicant shall incorporate the following in building plans:
    - Low-emission water heaters shall be used. Solar water heaters are encouraged.
    - Exterior windows shall utilize window treatments for efficient energy conservation (p. 1-7).

- Design all project buildings to meet or exceed the California Building Code's (CBC) Title 24 energy standard, including, but not limited to, any combination of the following:
    - Increase insulation such that heat transfer and thermal bridging is minimized;
    - Limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption; and
    - Incorporate ENERGY STAR or better rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment.
- Install efficient lighting and lighting control systems. Use daylight as an integral part of the lighting systems in buildings.
- Install "cool" roofs and cool pavements.
- Install energy-efficient heating and cooling systems, appliances and equipment, and control systems.
- Install solar lights or light-emitting diodes (LEDs) for outdoor lighting or outdoor lighting that meets the City of Rialto City Code.
- Install solar photovoltaic or other technology to generate electricity on-site to reduce consumption from the electrical grid.
- Install electrical vehicle charging stations to promote the use of electrical vehicles (p. 1-13).

OR1-44 Cont.

These measures are more stringent and prescriptive than those measures identified in the 2010 Approved EIR for the RSP and in the DSEIR for the RSPA. When combined together, these measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduces emissions released during Project operation. An updated DSEIR must be prepared to include additional mitigation measures, as well as include an updated air quality and greenhouse gas analysis to ensure that the necessary mitigation measures are implemented to reduce operational emissions to below thresholds. Furthermore, the Project Applicant needs to demonstrate commitment to the implementation of these measures prior to Project approval, to ensure that the Project's operational emissions are reduced to the maximum extent possible.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Jessie Jaeger

RSPA Warehouse Land Uses (Passenger Cars)

San Bernardino-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Refrigerated Warehouse-No Rail	1,617.55	1000sqft	53.67	1,617,550.00	0
Unrefrigerated Warehouse-No Rail	13,087.45	1000sqft	434.23	13,087,450.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	32
Climate Zone	10			**Operational Year**	2017
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	630.89	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Total Lot Acreage = 487.90 Consistent with DSEIR. Refrigerated warehouses represent 15% of total warehouse land uses within RSPA (includes Planning Area 108).

Construction Phase - Operational Run Only

Off-road Equipment - Operational Run Only

Trips and VMT - Operational Run Only

Vehicle Trips - C-W Trips represent employee trips. All passenger car trips assumed to be employee trips.

Vechicle Emission Factors - Passenger Cars Only

Vechicle Emission Factors - Passenger Cars Only

Vechicle Emission Factors - Passenger Cars Only

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	500.00	1.00
tblLandUse	LandUseSquareFeet	13,087,500.00	13,087,450.00
tblLandUse	LotAcreage	37.13	53.67
tblLandUse	LotAcreage	300.45	434.23
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblProjectCharacteristics	OperationalYear	2014	2017
tblVehicleEF	HHD	0.04	0.00
tblVehicleEF	HHD	0.04	0.00
tblVehicleEF	HHD	0.04	0.00
tblVehicleEF	LDA	0.47	1.00
tblVehicleEF	LDA	0.47	1.00
tblVehicleEF	LDA	0.47	1.00
tblVehicleEF	LDT1	0.07	0.00
tblVehicleEF	LDT1	0.07	0.00
tblVehicleEF	LDT1	0.07	0.00
tblVehicleEF	LDT2	0.17	0.00
tblVehicleEF	LDT2	0.17	0.00
tblVehicleEF	LDT2	0.17	0.00
tblVehicleEF	LHD1	0.06	0.00
tblVehicleEF	LHD1	0.06	0.00
tblVehicleEF	LHD1	0.06	0.00
tblVehicleEF	LHD2	9.0390e-003	0.00
tblVehicleEF	LHD2	9.0390e-003	0.00
tblVehicleEF	LHD2	9.0390e-003	0.00
tblVehicleEF	MCY	4.9210e-003	0.00

tblVehicleEF	MCY	4.9210e-003	0.00
tblVehicleEF	MCY	4.9210e-003	0.00
tblVehicleEF	MDV	0.16	0.00
tblVehicleEF	MDV	0.16	0.00
tblVehicleEF	MDV	0.16	0.00
tblVehicleEF	MH	2.9320e-003	0.00
tblVehicleEF	MH	2.9320e-003	0.00
tblVehicleEF	MH	2.9320e-003	0.00
tblVehicleEF	MHD	0.02	0.00
tblVehicleEF	MHD	0.02	0.00
tblVehicleEF	MHD	0.02	0.00
tblVehicleEF	OBUS	1.1220e-003	0.00
tblVehicleEF	OBUS	1.1220e-003	0.00
tblVehicleEF	OBUS	1.1220e-003	0.00
tblVehicleEF	SBUS	7.1200e-004	0.00
tblVehicleEF	SBUS	7.1200e-004	0.00
tblVehicleEF	SBUS	7.1200e-004	0.00
tblVehicleEF	UBUS	1.3340e-003	0.00
tblVehicleEF	UBUS	1.3340e-003	0.00
tblVehicleEF	UBUS	1.3340e-003	0.00
tblVehicleTrips	CNW_TTP	41.00	0.00
tblVehicleTrips	CNW_TTP	41.00	0.00
tblVehicleTrips	CW_TTP	59.00	100.00
tblVehicleTrips	CW_TTP	59.00	100.00
tblVehicleTrips	DV_TP	5.00	0.00
tblVehicleTrips	DV_TP	5.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00

tblVehicleTrips	PR_TP	92.00	100.00
tblVehicleTrips	PR_TP	92.00	100.00
tblVehicleTrips	ST_TR	2.59	2.14
tblVehicleTrips	ST_TR	2.59	2.14
tblVehicleTrips	SU_TR	2.59	2.14
tblVehicleTrips	SU_TR	2.59	2.14
tblVehicleTrips	WD_TR	2.59	2.14
tblVehicleTrips	WD_TR	2.59	2.14

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2017	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2017	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	ROG	**NOx**	**CO**	**SO2**	**Fugitive PM10**	**Exhaust PM10**	**PM10 Total**	**Fugitive PM2.5**	**Exhaust PM2.5**	**PM2.5 Total**	**Bio- CO2**	**NBio-CO2**	**Total CO2**	**CH4**	**N20**	**CO2e**
Percent Reduction	**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**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	384.6736	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Energy	3.3094	30.0850	25.2714	0.1805		2.2865	2.2865		2.2865	2.2865		36,102.0192	36,102.0192	0.6920	0.6619	36,321.7301
Mobile	78.9091	102.6219	1,510.4199	4.3818	396.1173	2.1555	398.2727	105.0062	1.9846	106.9907		341,842.1286	341,842.1286	13.7583		342,131.0538
Total	**466.8921**	**132.7214**	**1,537.2211**	**4.5624**	**396.1173**	**4.4474**	**400.5647**	**105.0062**	**4.2765**	**109.2827**		**377,947.3660**	**377,947.3660**	**14.4593**	**0.6619**	**378,456.1902**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	384.6736	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Energy	3.3094	30.0850	25.2714	0.1805		2.2865	2.2865		2.2865	2.2865		36,102.0192	36,102.0192	0.6920	0.6619	36,321.7301
Mobile	78.9091	102.6219	1,510.4199	4.3818	396.1173	2.1555	398.2727	105.0062	1.9846	106.9907		341,842.1286	341,842.1286	13.7583		342,131.0538
Total	**466.8921**	**132.7214**	**1,537.2211**	**4.5624**	**396.1173**	**4.4474**	**400.5647**	**105.0062**	**4.2765**	**109.2827**		**377,947.3660**	**377,947.3660**	**14.4593**	**0.6619**	**378,456.1902**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	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	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2017	1/2/2017	5	1	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Excavators	0	8.00	162	0.38
Demolition	Concrete/Industrial Saws	0	8.00	81	0.73
Demolition	Rubber Tired Dozers	0	8.00	255	0.40

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	0	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**		**0.0000**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**		**0.0000**

3.2 Demolition - 2017

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**		**0.0000**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	78.9091	102.6219	1,510.4199	4.3818	396.1173	2.1555	398.2727	105.0062	1.9846	106.9907		341,842.1286	341,842.1286	13.7583		342,131.0538
Unmitigated	78.9091	102.6219	1,510.4199	4.3818	396.1173	2.1555	398.2727	105.0062	1.9846	106.9907		341,842.1286	341,842.1286	13.7583		342,131.0538

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Refrigerated Warehouse-No Rail	3,455.09	3,455.09	3455.09	20,877,016	20,877,016
Unrefrigerated Warehouse-No Rail	27,954.79	27,954.79	27954.79	168,914,042	168,914,042
Total	31,409.88	31,409.88	31,409.88	189,791,059	189,791,059

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Refrigerated Warehouse-No	16.60	8.40	6.90	100.00	0.00	0.00	100	0	0
Unrefrigerated Warehouse-No	16.60	8.40	6.90	100.00	0.00	0.00	100	0	0

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	3.3094	30.0850	25.2714	0.1805		2.2865	2.2865		2.2865	2.2865		36,102.0192	36,102.0192	0.6920	0.6619	36,321.7301
NaturalGas Unmitigated	3.3094	30.0850	25.2714	0.1805		2.2865	2.2865		2.2865	2.2865		36,102.0192	36,102.0192	0.6920	0.6619	36,321.7301

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Refrigerated Warehouse-No Rail	230135	2.4819	22.5623	18.9523	0.1354		1.7147	1.7147		1.7147	1.7147		27,074.7370	27,074.7370	0.5189	0.4964	27,239.5093
Unrefrigerated Warehouse-No Rail	76731.9	0.8275	7.5227	6.3191	0.0451		0.5717	0.5717		0.5717	0.5717		9,027.2822	9,027.2822	0.1730	0.1655	9,082.2207
Total		**3.3094**	**30.0850**	**25.2714**	**0.1805**		**2.2865**	**2.2865**		**2.2865**	**2.2865**		**36,102.0192**	**36,102.0192**	**0.6920**	**0.6619**	**36,321.7301**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Refrigerated Warehouse-No Rail	230.135	2.4819	22.5623	18.9523	0.1354		1.7147	1.7147		1.7147	1.7147		27,074.7370	27,074.7370	0.5189	0.4964	27,239.5093
Unrefrigerated Warehouse-No Rail	76.7319	0.8275	7.5227	6.3191	0.0451		0.5717	0.5717		0.5717	0.5717		9,027.2822	9,027.2822	0.1730	0.1655	9,082.2207
Total		**3.3094**	**30.0850**	**25.2714**	**0.1805**		**2.2865**	**2.2865**		**2.2865**	**2.2865**		**36,102.0192**	**36,102.0192**	**0.6920**	**0.6619**	**36,321.7301**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	384.6736	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Unmitigated	384.6736	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	93.3670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	291.1590					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.1476	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Total	**384.6736**	**0.0145**	**1.5297**	**1.1000e-004**		**5.5200e-003**	**5.5200e-003**		**5.5200e-003**	**5.5200e-003**		**3.2182**	**3.2182**	**8.9600e-003**		**3.4064**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	93.3670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	291.1590					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.1476	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Total	**384.6736**	**0.0145**	**1.5297**	**1.1000e-004**		**5.5200e-003**	**5.5200e-003**		**5.5200e-003**	**5.5200e-003**		**3.2182**	**3.2182**	**8.9600e-003**		**3.4064**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Vegetation

RSPA Warehouse Land Uses (Passenger Cars)

San Bernardino-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Refrigerated Warehouse-No Rail	1,617.55	1000sqft	53.67	1,617,550.00	0
Unrefrigerated Warehouse-No Rail	13,087.45	1000sqft	434.23	13,087,450.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	32
Climate Zone	10			**Operational Year**	2017
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	630.89	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Total Lot Acreage = 487.90 Consistent with DSEIR. Refrigerated warehouses represent 15% of total warehouse land uses within RSPA (includes Planning Area 108).

Construction Phase - Operational Run Only

Off-road Equipment - Operational Run Only

Trips and VMT - Operational Run Only

Vehicle Trips - C-W Trips represent employee trips. All passenger car trips assumed to be employee trips.

Vechicle Emission Factors - Passenger Cars Only

Vechicle Emission Factors - Passenger Cars Only

Vechicle Emission Factors - Passenger Cars Only

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	500.00	1.00
tblLandUse	LandUseSquareFeet	13,087,500.00	13,087,450.00
tblLandUse	LotAcreage	37.13	53.67
tblLandUse	LotAcreage	300.45	434.23
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblProjectCharacteristics	OperationalYear	2014	2017
tblVehicleEF	HHD	0.04	0.00
tblVehicleEF	HHD	0.04	0.00
tblVehicleEF	HHD	0.04	0.00
tblVehicleEF	LDA	0.47	1.00
tblVehicleEF	LDA	0.47	1.00
tblVehicleEF	LDA	0.47	1.00
tblVehicleEF	LDT1	0.07	0.00
tblVehicleEF	LDT1	0.07	0.00
tblVehicleEF	LDT1	0.07	0.00
tblVehicleEF	LDT2	0.17	0.00
tblVehicleEF	LDT2	0.17	0.00
tblVehicleEF	LDT2	0.17	0.00
tblVehicleEF	LHD1	0.06	0.00
tblVehicleEF	LHD1	0.06	0.00
tblVehicleEF	LHD1	0.06	0.00
tblVehicleEF	LHD2	9.0390e-003	0.00
tblVehicleEF	LHD2	9.0390e-003	0.00
tblVehicleEF	LHD2	9.0390e-003	0.00
tblVehicleEF	MCY	4.9210e-003	0.00

tblVehicleEF	MCY	4.9210e-003	0.00
tblVehicleEF	MCY	4.9210e-003	0.00
tblVehicleEF	MDV	0.16	0.00
tblVehicleEF	MDV	0.16	0.00
tblVehicleEF	MDV	0.16	0.00
tblVehicleEF	MH	2.9320e-003	0.00
tblVehicleEF	MH	2.9320e-003	0.00
tblVehicleEF	MH	2.9320e-003	0.00
tblVehicleEF	MHD	0.02	0.00
tblVehicleEF	MHD	0.02	0.00
tblVehicleEF	MHD	0.02	0.00
tblVehicleEF	OBUS	1.1220e-003	0.00
tblVehicleEF	OBUS	1.1220e-003	0.00
tblVehicleEF	OBUS	1.1220e-003	0.00
tblVehicleEF	SBUS	7.1200e-004	0.00
tblVehicleEF	SBUS	7.1200e-004	0.00
tblVehicleEF	SBUS	7.1200e-004	0.00
tblVehicleEF	UBUS	1.3340e-003	0.00
tblVehicleEF	UBUS	1.3340e-003	0.00
tblVehicleEF	UBUS	1.3340e-003	0.00
tblVehicleTrips	CNW_TTP	41.00	0.00
tblVehicleTrips	CNW_TTP	41.00	0.00
tblVehicleTrips	CW_TTP	59.00	100.00
tblVehicleTrips	CW_TTP	59.00	100.00
tblVehicleTrips	DV_TP	5.00	0.00
tblVehicleTrips	DV_TP	5.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00

tblVehicleTrips	PR_TP	92.00	100.00
tblVehicleTrips	PR_TP	92.00	100.00
tblVehicleTrips	ST_TR	2.59	2.14
tblVehicleTrips	ST_TR	2.59	2.14
tblVehicleTrips	SU_TR	2.59	2.14
tblVehicleTrips	SU_TR	2.59	2.14
tblVehicleTrips	WD_TR	2.59	2.14
tblVehicleTrips	WD_TR	2.59	2.14

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2017	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2017	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	ROG	**NOx**	**CO**	**SO2**	**Fugitive PM10**	**Exhaust PM10**	**PM10 Total**	**Fugitive PM2.5**	**Exhaust PM2.5**	**PM2.5 Total**	**Bio- CO2**	**NBio-CO2**	**Total CO2**	**CH4**	**N20**	**CO2e**
Percent Reduction	**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**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	384.6736	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Energy	3.3094	30.0850	25.2714	0.1805		2.2865	2.2865		2.2865	2.2865		36,102.0192	36,102.0192	0.6920	0.6619	36,321.7301
Mobile	72.6576	108.8987	1,264.7869	3.9766	396.1173	2.1555	398.2727	105.0062	1.9846	106.9907		310,569.3224	310,569.3224	13.7583		310,858.2476
Total	**460.6405**	**138.9983**	**1,291.5880**	**4.1572**	**396.1173**	**4.4474**	**400.5647**	**105.0062**	**4.2765**	**109.2827**		**346,674.5598**	**346,674.5598**	**14.4593**	**0.6619**	**347,183.3840**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	384.6736	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Energy	3.3094	30.0850	25.2714	0.1805		2.2865	2.2865		2.2865	2.2865		36,102.0192	36,102.0192	0.6920	0.6619	36,321.7301
Mobile	72.6576	108.8987	1,264.7869	3.9766	396.1173	2.1555	398.2727	105.0062	1.9846	106.9907		310,569.3224	310,569.3224	13.7583		310,858.2476
Total	**460.6405**	**138.9983**	**1,291.5880**	**4.1572**	**396.1173**	**4.4474**	**400.5647**	**105.0062**	**4.2765**	**109.2827**		**346,674.5598**	**346,674.5598**	**14.4593**	**0.6619**	**347,183.3840**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	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	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2017	1/2/2017	5	1	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Excavators	0	8.00	162	0.38
Demolition	Concrete/Industrial Saws	0	8.00	81	0.73
Demolition	Rubber Tired Dozers	0	8.00	255	0.40

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	0	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**		**0.0000**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**		**0.0000**

3.2 Demolition - 2017

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**		**0.0000**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	72.6576	108.8987	1,264.7869	3.9766	396.1173	2.1555	398.2727	105.0062	1.9846	106.9907		310,569.3224	310,569.3224	13.7583		310,858.2476
Unmitigated	72.6576	108.8987	1,264.7869	3.9766	396.1173	2.1555	398.2727	105.0062	1.9846	106.9907		310,569.3224	310,569.3224	13.7583		310,858.2476

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Refrigerated Warehouse-No Rail	3,455.09	3,455.09	3455.09	20,877,016	20,877,016
Unrefrigerated Warehouse-No Rail	27,954.79	27,954.79	27954.79	168,914,042	168,914,042
Total	31,409.88	31,409.88	31,409.88	189,791,059	189,791,059

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Refrigerated Warehouse-No	16.60	8.40	6.90	100.00	0.00	0.00	100	0	0
Unrefrigerated Warehouse-No	16.60	8.40	6.90	100.00	0.00	0.00	100	0	0

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	3.3094	30.0850	25.2714	0.1805		2.2865	2.2865		2.2865	2.2865		36,102.0192	36,102.0192	0.6920	0.6619	36,321.7301
NaturalGas Unmitigated	3.3094	30.0850	25.2714	0.1805		2.2865	2.2865		2.2865	2.2865		36,102.0192	36,102.0192	0.6920	0.6619	36,321.7301

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Unrefrigerated Warehouse-No Rail	76731.9	0.8275	7.5227	6.3191	0.0451		0.5717	0.5717		0.5717	0.5717		9,027.2822	9,027.2822	0.1730	0.1655	9,082.2207
Refrigerated Warehouse-No Rail	230135	2.4819	22.5623	18.9523	0.1354		1.7147	1.7147		1.7147	1.7147		27,074.7370	27,074.7370	0.5189	0.4964	27,239.5093
Total		**3.3094**	**30.0850**	**25.2714**	**0.1805**		**2.2865**	**2.2865**		**2.2865**	**2.2865**		**36,102.0192**	**36,102.0192**	**0.6920**	**0.6619**	**36,321.7301**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Refrigerated Warehouse-No Rail	230.135	2.4819	22.5623	18.9523	0.1354		1.7147	1.7147		1.7147	1.7147		27,074.7370	27,074.7370	0.5189	0.4964	27,239.5093
Unrefrigerated Warehouse-No Rail	76.7319	0.8275	7.5227	6.3191	0.0451		0.5717	0.5717		0.5717	0.5717		9,027.2822	9,027.2822	0.1730	0.1655	9,082.2207
Total		**3.3094**	**30.0850**	**25.2714**	**0.1805**		**2.2865**	**2.2865**		**2.2865**	**2.2865**		**36,102.0192**	**36,102.0192**	**0.6920**	**0.6619**	**36,321.7301**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	384.6736	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Unmitigated	384.6736	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	93.3670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	291.1590					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.1476	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Total	**384.6736**	**0.0145**	**1.5297**	**1.1000e-004**		**5.5200e-003**	**5.5200e-003**		**5.5200e-003**	**5.5200e-003**		**3.2182**	**3.2182**	**8.9600e-003**		**3.4064**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	93.3670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	291.1590					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.1476	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Total	**384.6736**	**0.0145**	**1.5297**	**1.1000e-004**		**5.5200e-003**	**5.5200e-003**		**5.5200e-003**	**5.5200e-003**		**3.2182**	**3.2182**	**8.9600e-003**		**3.4064**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Vegetation

RSPA Warehouse Land Uses (Trucks Only)

San Bernardino-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Refrigerated Warehouse-No Rail	1,617.55	1000sqft	53.67	1,617,550.00	0
Unrefrigerated Warehouse-No Rail	13,087.45	1000sqft	434.23	13,087,450.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	32
Climate Zone	10			**Operational Year**	2017
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	630.89	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Total Lot Acreage = 487.90 Consistent with DSEIR. Refrigerated warehouses represent 15% of total warehouse land uses within RSPA (includes Planning Area 108).

Construction Phase - Operational Run Only

Off-road Equipment - Operational Run Only

Trips and VMT - Operational Run Only

Vehicle Trips - C-NW Trips represent delviery trips. All truck trips assumed to be delivery trips.

Vechicle Emission Factors - Heavy Duty Trucks Only

Vechicle Emission Factors - Heavy Duty Trucks Only

Vechicle Emission Factors - Heavy Duty Trucks Only

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	500.00	1.00
tblLandUse	LandUseSquareFeet	13,087,500.00	13,087,450.00
tblLandUse	LotAcreage	37.13	53.67
tblLandUse	LotAcreage	300.45	434.23
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblProjectCharacteristics	OperationalYear	2014	2017
tblVehicleEF	HHD	0.04	0.60
tblVehicleEF	HHD	0.04	0.60
tblVehicleEF	HHD	0.04	0.60
tblVehicleEF	LDA	0.47	0.00
tblVehicleEF	LDA	0.47	0.00
tblVehicleEF	LDA	0.47	0.00
tblVehicleEF	LDT1	0.07	0.00
tblVehicleEF	LDT1	0.07	0.00
tblVehicleEF	LDT1	0.07	0.00
tblVehicleEF	LDT2	0.17	0.00
tblVehicleEF	LDT2	0.17	0.00
tblVehicleEF	LDT2	0.17	0.00
tblVehicleEF	LHD1	0.06	0.22
tblVehicleEF	LHD1	0.06	0.22
tblVehicleEF	LHD1	0.06	0.22
tblVehicleEF	LHD2	9.0390e-003	0.00
tblVehicleEF	LHD2	9.0390e-003	0.00
tblVehicleEF	LHD2	9.0390e-003	0.00
tblVehicleEF	MCY	4.9210e-003	0.00

tblVehicleEF	MCY	4.9210e-003	0.00
tblVehicleEF	MCY	4.9210e-003	0.00
tblVehicleEF	MDV	0.16	0.00
tblVehicleEF	MDV	0.16	0.00
tblVehicleEF	MDV	0.16	0.00
tblVehicleEF	MH	2.9320e-003	0.00
tblVehicleEF	MH	2.9320e-003	0.00
tblVehicleEF	MH	2.9320e-003	0.00
tblVehicleEF	MHD	0.02	0.18
tblVehicleEF	MHD	0.02	0.18
tblVehicleEF	MHD	0.02	0.18
tblVehicleEF	OBUS	1.1220e-003	0.00
tblVehicleEF	OBUS	1.1220e-003	0.00
tblVehicleEF	OBUS	1.1220e-003	0.00
tblVehicleEF	SBUS	7.1200e-004	0.00
tblVehicleEF	SBUS	7.1200e-004	0.00
tblVehicleEF	SBUS	7.1200e-004	0.00
tblVehicleEF	UBUS	1.3340e-003	0.00
tblVehicleEF	UBUS	1.3340e-003	0.00
tblVehicleEF	UBUS	1.3340e-003	0.00
tblVehicleTrips	CNW_TL	6.90	40.00
tblVehicleTrips	CNW_TL	6.90	40.00
tblVehicleTrips	CNW_TTP	41.00	100.00
tblVehicleTrips	CNW_TTP	41.00	100.00
tblVehicleTrips	CW_TTP	59.00	0.00
tblVehicleTrips	CW_TTP	59.00	0.00
tblVehicleTrips	DV_TP	5.00	0.00
tblVehicleTrips	DV_TP	5.00	0.00

tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	92.00	100.00
tblVehicleTrips	PR_TP	92.00	100.00
tblVehicleTrips	ST_TR	2.59	1.42
tblVehicleTrips	ST_TR	2.59	1.42
tblVehicleTrips	SU_TR	2.59	1.42
tblVehicleTrips	SU_TR	2.59	1.42
tblVehicleTrips	WD_TR	2.59	1.42
tblVehicleTrips	WD_TR	2.59	1.42

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2017	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2017	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	ROG	**NOx**	**CO**	**SO2**	**Fugitive PM10**	**Exhaust PM10**	**PM10 Total**	**Fugitive PM2.5**	**Exhaust PM2.5**	**PM2.5 Total**	**Bio- CO2**	**NBio-CO2**	**Total CO2**	**CH4**	**N20**	**CO2e**
Percent Reduction	**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**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	384.6736	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Energy	3.3094	30.0850	25.2714	0.1805		2.2865	2.2865		2.2865	2.2865		36,102.0192	36,102.0192	0.6920	0.6619	36,321.7301
Mobile	443.9617	7,586.6268	4,303.3672	23.7298	722.9804	126.6421	849.6225	200.5192	116.5050	317.0242		2,349,247.9894	2,349,247.9894	19.3024		2,349,653.3394
Total	**831.9447**	**7,616.7264**	**4,330.1683**	**23.9105**	**722.9804**	**128.9341**	**851.9144**	**200.5192**	**118.7969**	**319.3162**		**2,385,353.2268**	**2,385,353.2268**	**20.0033**	**0.6619**	**2,385,978.4759**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	384.6736	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Energy	3.3094	30.0850	25.2714	0.1805		2.2865	2.2865		2.2865	2.2865		36,102.0192	36,102.0192	0.6920	0.6619	36,321.7301
Mobile	443.9617	7,586.6268	4,303.3672	23.7298	722.9804	126.6421	849.6225	200.5192	116.5050	317.0242		2,349,247.9894	2,349,247.9894	19.3024		2,349,653.3394
Total	**831.9447**	**7,616.7264**	**4,330.1683**	**23.9105**	**722.9804**	**128.9341**	**851.9144**	**200.5192**	**118.7969**	**319.3162**		**2,385,353.2268**	**2,385,353.2268**	**20.0033**	**0.6619**	**2,385,978.4759**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	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	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2017	1/2/2017	5	1	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Excavators	0	8.00	162	0.38
Demolition	Concrete/Industrial Saws	0	8.00	81	0.73
Demolition	Rubber Tired Dozers	0	8.00	255	0.40

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	0	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**		**0.0000**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**		**0.0000**

3.2 Demolition - 2017

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**		**0.0000**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	443.9617	7,586.6268	4,303.3672	23.7298	722.9804	126.6421	849.6225	200.5192	116.5050	317.0242		2,349,247.9894	2,349,247.9894	19.3024		2,349,653.3394
Unmitigated	443.9617	7,586.6268	4,303.3672	23.7298	722.9804	126.6421	849.6225	200.5192	116.5050	317.0242		2,349,247.9894	2,349,247.9894	19.3024		2,349,653.3394

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Refrigerated Warehouse-No Rail	2,296.92	2,296.92	2296.92	33,443,170	33,443,170
Unrefrigerated Warehouse-No Rail	18,584.18	18,584.18	18584.18	270,585,646	270,585,646
Total	20,881.10	20,881.10	20,881.10	304,028,816	304,028,816

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Refrigerated Warehouse-No	16.60	8.40	40.00	0.00	0.00	100.00	100	0	0
Unrefrigerated Warehouse-No	16.60	8.40	40.00	0.00	0.00	100.00	100	0	0

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.000000	0.000000	0.000000	0.000000	0.220000	0.000000	0.177000	0.603000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	3.3094	30.0850	25.2714	0.1805		2.2865	2.2865		2.2865	2.2865		36,102.0192	36,102.0192	0.6920	0.6619	36,321.7301
NaturalGas Unmitigated	3.3094	30.0850	25.2714	0.1805		2.2865	2.2865		2.2865	2.2865		36,102.0192	36,102.0192	0.6920	0.6619	36,321.7301

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Refrigerated Warehouse-No Rail	230135	2.4819	22.5623	18.9523	0.1354		1.7147	1.7147		1.7147	1.7147		27,074.7370	27,074.7370	0.5189	0.4964	27,239.5093
Unrefrigerated Warehouse-No Rail	76731.9	0.8275	7.5227	6.3191	0.0451		0.5717	0.5717		0.5717	0.5717		9,027.2822	9,027.2822	0.1730	0.1655	9,082.2207
Total		**3.3094**	**30.0850**	**25.2714**	**0.1805**		**2.2865**	**2.2865**		**2.2865**	**2.2865**		**36,102.0192**	**36,102.0192**	**0.6920**	**0.6619**	**36,321.7301**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Refrigerated Warehouse-No Rail	230.135	2.4819	22.5623	18.9523	0.1354		1.7147	1.7147		1.7147	1.7147		27,074.7370	27,074.7370	0.5189	0.4964	27,239.5093
Unrefrigerated Warehouse-No Rail	76.7319	0.8275	7.5227	6.3191	0.0451		0.5717	0.5717		0.5717	0.5717		9,027.2822	9,027.2822	0.1730	0.1655	9,082.2207
Total		**3.3094**	**30.0850**	**25.2714**	**0.1805**		**2.2865**	**2.2865**		**2.2865**	**2.2865**		**36,102.0192**	**36,102.0192**	**0.6920**	**0.6619**	**36,321.7301**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	384.6736	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Unmitigated	384.6736	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	93.3670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	291.1590					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.1476	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Total	**384.6736**	**0.0145**	**1.5297**	**1.1000e-004**		**5.5200e-003**	**5.5200e-003**		**5.5200e-003**	**5.5200e-003**		**3.2182**	**3.2182**	**8.9600e-003**		**3.4064**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	93.3670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	291.1590					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.1476	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Total	**384.6736**	**0.0145**	**1.5297**	**1.1000e-004**		**5.5200e-003**	**5.5200e-003**		**5.5200e-003**	**5.5200e-003**		**3.2182**	**3.2182**	**8.9600e-003**		**3.4064**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Vegetation

RSPA Warehouse Land Uses (Trucks Only)

San Bernardino-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Refrigerated Warehouse-No Rail	1,617.55	1000sqft	53.67	1,617,550.00	0
Unrefrigerated Warehouse-No Rail	13,087.45	1000sqft	434.23	13,087,450.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	32
Climate Zone	10			**Operational Year**	2017
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	630.89	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Total Lot Acreage = 487.90 Consistent with DSEIR. Refrigerated warehouses represent 15% of total warehouse land uses within RSPA (includes Planning Area 108).

Construction Phase - Operational Run Only

Off-road Equipment - Operational Run Only

Trips and VMT - Operational Run Only

Vehicle Trips - C-NW Trips represent delviery trips. All truck trips assumed to be delivery trips.

Vechicle Emission Factors - Heavy Duty Trucks Only

Vechicle Emission Factors - Heavy Duty Trucks Only

Vechicle Emission Factors - Heavy Duty Trucks Only

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	500.00	1.00
tblLandUse	LandUseSquareFeet	13,087,500.00	13,087,450.00
tblLandUse	LotAcreage	37.13	53.67
tblLandUse	LotAcreage	300.45	434.23
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblProjectCharacteristics	OperationalYear	2014	2017
tblVehicleEF	HHD	0.04	0.60
tblVehicleEF	HHD	0.04	0.60
tblVehicleEF	HHD	0.04	0.60
tblVehicleEF	LDA	0.47	0.00
tblVehicleEF	LDA	0.47	0.00
tblVehicleEF	LDA	0.47	0.00
tblVehicleEF	LDT1	0.07	0.00
tblVehicleEF	LDT1	0.07	0.00
tblVehicleEF	LDT1	0.07	0.00
tblVehicleEF	LDT2	0.17	0.00
tblVehicleEF	LDT2	0.17	0.00
tblVehicleEF	LDT2	0.17	0.00
tblVehicleEF	LHD1	0.06	0.22
tblVehicleEF	LHD1	0.06	0.22
tblVehicleEF	LHD1	0.06	0.22
tblVehicleEF	LHD2	9.0390e-003	0.00
tblVehicleEF	LHD2	9.0390e-003	0.00
tblVehicleEF	LHD2	9.0390e-003	0.00
tblVehicleEF	MCY	4.9210e-003	0.00

tblVehicleEF	MCY	4.9210e-003	0.00
tblVehicleEF	MCY	4.9210e-003	0.00
tblVehicleEF	MDV	0.16	0.00
tblVehicleEF	MDV	0.16	0.00
tblVehicleEF	MDV	0.16	0.00
tblVehicleEF	MH	2.9320e-003	0.00
tblVehicleEF	MH	2.9320e-003	0.00
tblVehicleEF	MH	2.9320e-003	0.00
tblVehicleEF	MHD	0.02	0.18
tblVehicleEF	MHD	0.02	0.18
tblVehicleEF	MHD	0.02	0.18
tblVehicleEF	OBUS	1.1220e-003	0.00
tblVehicleEF	OBUS	1.1220e-003	0.00
tblVehicleEF	OBUS	1.1220e-003	0.00
tblVehicleEF	SBUS	7.1200e-004	0.00
tblVehicleEF	SBUS	7.1200e-004	0.00
tblVehicleEF	SBUS	7.1200e-004	0.00
tblVehicleEF	UBUS	1.3340e-003	0.00
tblVehicleEF	UBUS	1.3340e-003	0.00
tblVehicleEF	UBUS	1.3340e-003	0.00
tblVehicleTrips	CNW_TL	6.90	40.00
tblVehicleTrips	CNW_TL	6.90	40.00
tblVehicleTrips	CNW_TTP	41.00	100.00
tblVehicleTrips	CNW_TTP	41.00	100.00
tblVehicleTrips	CW_TTP	59.00	0.00
tblVehicleTrips	CW_TTP	59.00	0.00
tblVehicleTrips	DV_TP	5.00	0.00
tblVehicleTrips	DV_TP	5.00	0.00

tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	92.00	100.00
tblVehicleTrips	PR_TP	92.00	100.00
tblVehicleTrips	ST_TR	2.59	1.42
tblVehicleTrips	ST_TR	2.59	1.42
tblVehicleTrips	SU_TR	2.59	1.42
tblVehicleTrips	SU_TR	2.59	1.42
tblVehicleTrips	WD_TR	2.59	1.42
tblVehicleTrips	WD_TR	2.59	1.42

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2017	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2017	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	ROG	**NOx**	**CO**	**SO2**	**Fugitive PM10**	**Exhaust PM10**	**PM10 Total**	**Fugitive PM2.5**	**Exhaust PM2.5**	**PM2.5 Total**	**Bio- CO2**	**NBio-CO2**	**Total CO2**	**CH4**	**N20**	**CO2e**
Percent Reduction	**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**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	384.6736	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Energy	3.3094	30.0850	25.2714	0.1805		2.2865	2.2865		2.2865	2.2865		36,102.0192	36,102.0192	0.6920	0.6619	36,321.7301
Mobile	452.7351	7,909.5955	4,585.0886	23.7050	722.9804	126.8101	849.7905	200.5192	116.6596	317.1788		2,346,367.6870	2,346,367.6870	19.4013		2,346,775.1152
Total	**840.7181**	**7,939.6950**	**4,611.8897**	**23.8857**	**722.9804**	**129.1021**	**852.0825**	**200.5192**	**118.9515**	**319.4708**		**2,382,472.9245**	**2,382,472.9245**	**20.1023**	**0.6619**	**2,383,100.2517**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	384.6736	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Energy	3.3094	30.0850	25.2714	0.1805		2.2865	2.2865		2.2865	2.2865		36,102.0192	36,102.0192	0.6920	0.6619	36,321.7301
Mobile	452.7351	7,909.5955	4,585.0886	23.7050	722.9804	126.8101	849.7905	200.5192	116.6596	317.1788		2,346,367.6870	2,346,367.6870	19.4013		2,346,775.1152
Total	**840.7181**	**7,939.6950**	**4,611.8897**	**23.8857**	**722.9804**	**129.1021**	**852.0825**	**200.5192**	**118.9515**	**319.4708**		**2,382,472.9245**	**2,382,472.9245**	**20.1023**	**0.6619**	**2,383,100.2517**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	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	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2017	1/2/2017	5	1	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Excavators	0	8.00	162	0.38
Demolition	Concrete/Industrial Saws	0	8.00	81	0.73
Demolition	Rubber Tired Dozers	0	8.00	255	0.40

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	0	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**		**0.0000**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**		**0.0000**

3.2 Demolition - 2017

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**		**0.0000**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	452.7351	7,909.5955	4,585.0886	23.7050	722.9804	126.8101	849.7905	200.5192	116.6596	317.1788		2,346,367.6870	2,346,367.6870	19.4013		2,346,775.1152
Unmitigated	452.7351	7,909.5955	4,585.0886	23.7050	722.9804	126.8101	849.7905	200.5192	116.6596	317.1788		2,346,367.6870	2,346,367.6870	19.4013		2,346,775.1152

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Refrigerated Warehouse-No Rail	2,296.92	2,296.92	2296.92	33,443,170	33,443,170
Unrefrigerated Warehouse-No Rail	18,584.18	18,584.18	18584.18	270,585,646	270,585,646
Total	20,881.10	20,881.10	20,881.10	304,028,816	304,028,816

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Refrigerated Warehouse-No	16.60	8.40	40.00	0.00	0.00	100.00	100	0	0
Unrefrigerated Warehouse-No	16.60	8.40	40.00	0.00	0.00	100.00	100	0	0

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.000000	0.000000	0.000000	0.000000	0.220000	0.000000	0.177000	0.603000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	3.3094	30.0850	25.2714	0.1805		2.2865	2.2865		2.2865	2.2865		36,102.0192	36,102.0192	0.6920	0.6619	36,321.7301
NaturalGas Unmitigated	3.3094	30.0850	25.2714	0.1805		2.2865	2.2865		2.2865	2.2865		36,102.0192	36,102.0192	0.6920	0.6619	36,321.7301

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Unrefrigerated Warehouse-No Rail	76731.9	0.8275	7.5227	6.3191	0.0451		0.5717	0.5717		0.5717	0.5717		9,027.2822	9,027.2822	0.1730	0.1655	9,082.2207
Refrigerated Warehouse-No Rail	230135	2.4819	22.5623	18.9523	0.1354		1.7147	1.7147		1.7147	1.7147		27,074.7370	27,074.7370	0.5189	0.4964	27,239.5093
Total		**3.3094**	**30.0850**	**25.2714**	**0.1805**		**2.2865**	**2.2865**		**2.2865**	**2.2865**		**36,102.0192**	**36,102.0192**	**0.6920**	**0.6619**	**36,321.7301**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Refrigerated Warehouse-No Rail	230.135	2.4819	22.5623	18.9523	0.1354		1.7147	1.7147		1.7147	1.7147		27,074.7370	27,074.7370	0.5189	0.4964	27,239.5093
Unrefrigerated Warehouse-No Rail	76.7319	0.8275	7.5227	6.3191	0.0451		0.5717	0.5717		0.5717	0.5717		9,027.2822	9,027.2822	0.1730	0.1655	9,082.2207
Total		**3.3094**	**30.0850**	**25.2714**	**0.1805**		**2.2865**	**2.2865**		**2.2865**	**2.2865**		**36,102.0192**	**36,102.0192**	**0.6920**	**0.6619**	**36,321.7301**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	384.6736	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Unmitigated	384.6736	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	93.3670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	291.1590					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.1476	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Total	**384.6736**	**0.0145**	**1.5297**	**1.1000e-004**		**5.5200e-003**	**5.5200e-003**		**5.5200e-003**	**5.5200e-003**		**3.2182**	**3.2182**	**8.9600e-003**		**3.4064**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	93.3670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	291.1590					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.1476	0.0145	1.5297	1.1000e-004		5.5200e-003	5.5200e-003		5.5200e-003	5.5200e-003		3.2182	3.2182	8.9600e-003		3.4064
Total	**384.6736**	**0.0145**	**1.5297**	**1.1000e-004**		**5.5200e-003**	**5.5200e-003**		**5.5200e-003**	**5.5200e-003**		**3.2182**	**3.2182**	**8.9600e-003**		**3.4064**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Vegetation

Renaissance Specific Plan Amendment (Excluding General Light Industry)

San Bernardino-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Office Park	319.90	1000sqft	25.50	319,900.00	0
General Office Building	923.70	1000sqft	92.60	923,700.00	0
Regional Shopping Center	1,128.40	1000sqft	53.20	1,128,400.00	0
Single Family Housing	380.00	Dwelling Unit	47.50	684,000.00	1087
Condo/Townhouse	882.00	Dwelling Unit	44.50	882,000.00	2523
City Park	25.00	Acre	25.00	1,089,000.00	0
Elementary School	100.00	Employee	13.00	101,814.65	0
Parking Lot	16.10	Acre	16.10	701,316.00	0
Other Asphalt Surfaces	299.40	Acre	299.40	13,041,864.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	32
Climate Zone	10			**Operational Year**	2017
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	630.89	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Land Uses represent remaining land uses, once warehouse land uses are taken out.

Construction Phase - Operational Run Only

Off-road Equipment - Operational Run Only

Trips and VMT - Operational Run Only

Vehicle Trips - Consistent with DSEIR

Woodstoves - Consistent with DSEIR.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	700.00	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberGas	749.70	882.00
tblFireplaces	NumberGas	323.00	380.00
tblFireplaces	NumberNoFireplace	88.20	0.00
tblFireplaces	NumberNoFireplace	38.00	0.00
tblFireplaces	NumberWood	44.10	0.00
tblFireplaces	NumberWood	19.00	0.00
tblLandUse	LotAcreage	7.34	25.50
tblLandUse	LotAcreage	21.21	92.60
tblLandUse	LotAcreage	25.90	53.20
tblLandUse	LotAcreage	123.38	47.50
tblLandUse	LotAcreage	55.13	44.50
tblLandUse	LotAcreage	2.34	13.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblProjectCharacteristics	OperationalYear	2014	2017

tblVehicleTrips	ST_TR	1.59	1.54
tblVehicleTrips	ST_TR	7.16	5.81
tblVehicleTrips	ST_TR	2.37	12.44
tblVehicleTrips	ST_TR	49.97	28.34
tblVehicleTrips	ST_TR	10.08	9.52
tblVehicleTrips	SU_TR	1.59	1.54
tblVehicleTrips	SU_TR	6.07	5.81
tblVehicleTrips	SU_TR	0.98	12.44
tblVehicleTrips	SU_TR	25.24	28.34
tblVehicleTrips	SU_TR	8.77	9.52
tblVehicleTrips	WD_TR	1.59	1.54
tblVehicleTrips	WD_TR	6.59	5.81
tblVehicleTrips	WD_TR	11.01	12.44
tblVehicleTrips	WD_TR	42.94	28.34
tblVehicleTrips	WD_TR	9.57	9.52
tblWoodstoves	NumberCatalytic	44.10	0.00
tblWoodstoves	NumberCatalytic	19.00	0.00
tblWoodstoves	NumberNoncatalytic	44.10	0.00
tblWoodstoves	NumberNoncatalytic	19.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**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**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	488.3358	1.2287	105.5916	5.5200e-003		2.2647	2.2647		2.2468	2.2468	0.0000	26,912.7944	26,912.7944	0.7021	0.4900	27,079.4240
Energy	1.1495	9.9506	5.1139	0.0627		0.7942	0.7942		0.7942	0.7942		12,540.3903	12,540.3903	0.2404	0.2299	12,616.7090
Mobile	204.1113	560.7227	2,191.7277	5.0343	326.5043	7.5490	334.0533	87.2017	6.9467	94.1483		429,153.4355	429,153.4355	15.5016		429,478.9685
Total	**693.5966**	**571.9020**	**2,302.4332**	**5.1025**	**326.5043**	**10.6079**	**337.1122**	**87.2017**	**9.9877**	**97.1894**	**0.0000**	**468,606.6202**	**468,606.6202**	**16.4440**	**0.7199**	**469,175.1015**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	488.3358	1.2287	105.5916	5.5200e-003		2.2647	2.2647		2.2468	2.2468	0.0000	26,912.7944	26,912.7944	0.7021	0.4900	27,079.4240
Energy	1.1495	9.9506	5.1139	0.0627		0.7942	0.7942		0.7942	0.7942		12,540.3903	12,540.3903	0.2404	0.2299	12,616.7090
Mobile	204.1113	560.7227	2,191.7277	5.0343	326.5043	7.5490	334.0533	87.2017	6.9467	94.1483		429,153.4355	429,153.4355	15.5016		429,478.9685
Total	**693.5966**	**571.9020**	**2,302.4332**	**5.1025**	**326.5043**	**10.6079**	**337.1122**	**87.2017**	**9.9877**	**97.1894**	**0.0000**	**468,606.6202**	**468,606.6202**	**16.4440**	**0.7199**	**469,175.1015**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	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	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2017	12/30/2016	5	0	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Excavators	0	8.00	162	0.38
Demolition	Concrete/Industrial Saws	0	8.00	81	0.73
Demolition	Rubber Tired Dozers	0	8.00	255	0.40

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	0	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Unmitigated	204.1113	560.7227	2,191.7277	5.0343	326.5043	7.5490	334.0533	87.2017	6.9467	94.1483		429,153.4355	429,153.4355	15.5016		429,478.9685
Mitigated	204.1113	560.7227	2,191.7277	5.0343	326.5043	7.5490	334.0533	87.2017	6.9467	94.1483		429,153.4355	429,153.4355	15.5016		429,478.9685

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	38.50	38.50	38.50	110,785	110,785
Condo/Townhouse	5,124.42	5,124.42	5124.42	17,510,922	17,510,922
Elementary School	1,571.00	0.00	0.00	3,867,335	3,867,335
General Office Building	11,490.83	11,490.83	11490.83	37,017,254	37,017,254
Office Park	3,653.26	524.64	243.12	9,187,058	9,187,058
Other Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Regional Shopping Center	31,978.86	31,978.86	31978.86	69,165,275	69,165,275
Single Family Housing	3,617.60	3,617.60	3617.60	12,361,889	12,361,889
Total	57,474.46	52,774.84	52,493.33	149,220,518	149,220,518

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	16.60	8.40	6.90	33.00	48.00	19.00	66	28	6
Condo/Townhouse	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Elementary School	16.60	8.40	6.90	65.00	30.00	5.00	63	25	12
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
Office Park	16.60	8.40	6.90	33.00	48.00	19.00	82	15	3
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11
Single Family Housing	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.471808	0.065740	0.172776	0.155900	0.055970	0.009039	0.016651	0.041094	0.001122	0.001334	0.004921	0.000712	0.002932

5.0 Energy Detail

4.4 Fleet Mix

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	1.1495	9.9506	5.1139	0.0627		0.7942	0.7942		0.7942	0.7942		12,540.3903	12,540.3903	0.2404	0.2299	12,616.7090
NaturalGas Unmitigated	1.1495	9.9506	5.1139	0.0627		0.7942	0.7942		0.7942	0.7942		12,540.3903	12,540.3903	0.2404	0.2299	12,616.7090

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	49792	0.5370	4.5887	1.9526	0.0293		0.3710	0.3710		0.3710	0.3710		5,857.8815	5,857.8815	0.1123	0.1074	5,893.5316
Elementary School	2546.76	0.0275	0.2497	0.2097	1.5000e-003		0.0190	0.0190		0.0190	0.0190		299.6189	299.6189	5.7400e-003	5.4900e-003	301.4424
General Office Building	9237	0.0996	0.9056	0.7607	5.4300e-003		0.0688	0.0688		0.0688	0.0688		1,086.7059	1,086.7059	0.0208	0.0199	1,093.3194
Office Park	2690.67	0.0290	0.2638	0.2216	1.5800e-003		0.0201	0.0201		0.0201	0.0201		316.5489	316.5489	6.0700e-003	5.8000e-003	318.4754
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Regional Shopping Center	7172.3	0.0774	0.7032	0.5907	4.2200e-003		0.0534	0.0534		0.0534	0.0534		843.7995	843.7995	0.0162	0.0155	848.9347
Single Family Housing	35154.6	0.3791	3.2397	1.3786	0.0207		0.2619	0.2619		0.2619	0.2619		4,135.8355	4,135.8355	0.0793	0.0758	4,161.0055
Total		**1.1495**	**9.9506**	**5.1139**	**0.0627**		**0.7942**	**0.7942**		**0.7942**	**0.7942**		**12,540.3903**	**12,540.3903**	**0.2404**	**0.2299**	**12,616.7090**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	49.792	0.5370	4.5887	1.9526	0.0293		0.3710	0.3710		0.3710	0.3710		5,857.8815	5,857.8815	0.1123	0.1074	5,893.5316
Elementary School	2.54676	0.0275	0.2497	0.2097	1.5000e-003		0.0190	0.0190		0.0190	0.0190		299.6189	299.6189	5.7400e-003	5.4900e-003	301.4424
General Office Building	9.237	0.0996	0.9056	0.7607	5.4300e-003		0.0688	0.0688		0.0688	0.0688		1,086.7059	1,086.7059	0.0208	0.0199	1,093.3194
Office Park	2.69067	0.0290	0.2638	0.2216	1.5800e-003		0.0201	0.0201		0.0201	0.0201		316.5489	316.5489	6.0700e-003	5.8000e-003	318.4754
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Regional Shopping Center	7.1723	0.0774	0.7032	0.5907	4.2200e-003		0.0534	0.0534		0.0534	0.0534		843.7995	843.7995	0.0162	0.0155	848.9347
Single Family Housing	35.1546	0.3791	3.2397	1.3786	0.0207		0.2619	0.2619		0.2619	0.2619		4,135.8355	4,135.8355	0.0793	0.0758	4,161.0055
Total		**1.1495**	**9.9506**	**5.1139**	**0.0627**		**0.7942**	**0.7942**		**0.7942**	**0.7942**		**12,540.3903**	**12,540.3903**	**0.2404**	**0.2299**	**12,616.7090**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Unmitigated	488.3358	1.2287	105.5916	5.5200e-003		2.2647	2.2647		2.2468	2.2468	0.0000	26,912.7944	26,912.7944	0.7021	0.4900	27,079.4240
Mitigated	488.3358	1.2287	105.5916	5.5200e-003		2.2647	2.2647		2.2468	2.2468	0.0000	26,912.7944	26,912.7944	0.7021	0.4900	27,079.4240

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	108.9179					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	373.6655					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	2.4498	1.1000e-004	0.1336	0.0000		1.6926	1.6926		1.6748	1.6748	0.0000	26,724.7059	26,724.7059	0.5122	0.4900	26,887.3480
Landscaping	3.3026	1.2286	105.4580	5.5200e-003		0.5721	0.5721		0.5721	0.5721		188.0886	188.0886	0.1899		192.0760
Total	**488.3358**	**1.2287**	**105.5916**	**5.5200e-003**		**2.2647**	**2.2647**		**2.2468**	**2.2468**	**0.0000**	**26,912.7944**	**26,912.7944**	**0.7021**	**0.4900**	**27,079.4240**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	108.9179					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	373.6655					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	2.4498	1.1000e-004	0.1336	0.0000		1.6926	1.6926		1.6748	1.6748	0.0000	26,724.7059	26,724.7059	0.5122	0.4900	26,887.3480
Landscaping	3.3026	1.2286	105.4580	5.5200e-003		0.5721	0.5721		0.5721	0.5721		188.0886	188.0886	0.1899		192.0760
Total	**488.3358**	**1.2287**	**105.5916**	**5.5200e-003**		**2.2647**	**2.2647**		**2.2468**	**2.2468**	**0.0000**	**26,912.7944**	**26,912.7944**	**0.7021**	**0.4900**	**27,079.4240**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Vegetation

Renaissance Specific Plan Amendment (Excluding General Light Industry)

San Bernardino-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Office Park	319.90	1000sqft	25.50	319,900.00	0
General Office Building	923.70	1000sqft	92.60	923,700.00	0
Regional Shopping Center	1,128.40	1000sqft	53.20	1,128,400.00	0
Single Family Housing	380.00	Dwelling Unit	47.50	684,000.00	1087
Condo/Townhouse	882.00	Dwelling Unit	44.50	882,000.00	2523
City Park	25.00	Acre	25.00	1,089,000.00	0
Elementary School	100.00	Employee	13.00	101,814.65	0
Parking Lot	16.10	Acre	16.10	701,316.00	0
Other Asphalt Surfaces	299.40	Acre	299.40	13,041,864.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	32
Climate Zone	10			**Operational Year**	2017
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	630.89	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Land Uses represent remaining land uses, once warehouse land uses are taken out.

Construction Phase - Operational Run Only

Off-road Equipment - Operational Run Only

Trips and VMT - Operational Run Only

Vehicle Trips - Consistent with DSEIR

Woodstoves - Consistent with DSEIR.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	700.00	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberGas	749.70	882.00
tblFireplaces	NumberGas	323.00	380.00
tblFireplaces	NumberNoFireplace	88.20	0.00
tblFireplaces	NumberNoFireplace	38.00	0.00
tblFireplaces	NumberWood	44.10	0.00
tblFireplaces	NumberWood	19.00	0.00
tblLandUse	LotAcreage	7.34	25.50
tblLandUse	LotAcreage	21.21	92.60
tblLandUse	LotAcreage	25.90	53.20
tblLandUse	LotAcreage	123.38	47.50
tblLandUse	LotAcreage	55.13	44.50
tblLandUse	LotAcreage	2.34	13.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblProjectCharacteristics	OperationalYear	2014	2017

tblVehicleTrips	ST_TR	1.59	1.54
tblVehicleTrips	ST_TR	7.16	5.81
tblVehicleTrips	ST_TR	2.37	12.44
tblVehicleTrips	ST_TR	49.97	28.34
tblVehicleTrips	ST_TR	10.08	9.52
tblVehicleTrips	SU_TR	1.59	1.54
tblVehicleTrips	SU_TR	6.07	5.81
tblVehicleTrips	SU_TR	0.98	12.44
tblVehicleTrips	SU_TR	25.24	28.34
tblVehicleTrips	SU_TR	8.77	9.52
tblVehicleTrips	WD_TR	1.59	1.54
tblVehicleTrips	WD_TR	6.59	5.81
tblVehicleTrips	WD_TR	11.01	12.44
tblVehicleTrips	WD_TR	42.94	28.34
tblVehicleTrips	WD_TR	9.57	9.52
tblWoodstoves	NumberCatalytic	44.10	0.00
tblWoodstoves	NumberCatalytic	19.00	0.00
tblWoodstoves	NumberNoncatalytic	44.10	0.00
tblWoodstoves	NumberNoncatalytic	19.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**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**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	488.3358	1.2287	105.5916	5.5200e-003		2.2647	2.2647		2.2468	2.2468	0.0000	26,912.7944	26,912.7944	0.7021	0.4900	27,079.4240
Energy	1.1495	9.9506	5.1139	0.0627		0.7942	0.7942		0.7942	0.7942		12,540.3903	12,540.3903	0.2404	0.2299	12,616.7090
Mobile	197.7229	584.8568	2,068.1960	4.6906	326.5043	7.5863	334.0905	87.2017	6.9809	94.1826		401,341.7903	401,341.7903	15.5212		401,667.7345
Total	**687.2083**	**596.0361**	**2,178.9015**	**4.7589**	**326.5043**	**10.6451**	**337.1494**	**87.2017**	**10.0220**	**97.2236**	**0.0000**	**440,794.9750**	**440,794.9750**	**16.4636**	**0.7199**	**441,363.8674**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	488.3358	1.2287	105.5916	5.5200e-003		2.2647	2.2647		2.2468	2.2468	0.0000	26,912.7944	26,912.7944	0.7021	0.4900	27,079.4240
Energy	1.1495	9.9506	5.1139	0.0627		0.7942	0.7942		0.7942	0.7942		12,540.3903	12,540.3903	0.2404	0.2299	12,616.7090
Mobile	197.7229	584.8568	2,068.1960	4.6906	326.5043	7.5863	334.0905	87.2017	6.9809	94.1826		401,341.7903	401,341.7903	15.5212		401,667.7345
Total	**687.2083**	**596.0361**	**2,178.9015**	**4.7589**	**326.5043**	**10.6451**	**337.1494**	**87.2017**	**10.0220**	**97.2236**	**0.0000**	**440,794.9750**	**440,794.9750**	**16.4636**	**0.7199**	**441,363.8674**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**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**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2017	12/30/2016	5	0	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Excavators	0	8.00	162	0.38
Demolition	Concrete/Industrial Saws	0	8.00	81	0.73
Demolition	Rubber Tired Dozers	0	8.00	255	0.40

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	0	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Unmitigated	197.7229	584.8568	2,068.1960	4.6906	326.5043	7.5863	334.0905	87.2017	6.9809	94.1826		401,341.7903	401,341.7903	15.5212		401,667.7345
Mitigated	197.7229	584.8568	2,068.1960	4.6906	326.5043	7.5863	334.0905	87.2017	6.9809	94.1826		401,341.7903	401,341.7903	15.5212		401,667.7345

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	38.50	38.50	38.50	110,785	110,785
Condo/Townhouse	5,124.42	5,124.42	5124.42	17,510,922	17,510,922
Elementary School	1,571.00	0.00	0.00	3,867,335	3,867,335
General Office Building	11,490.83	11,490.83	11490.83	37,017,254	37,017,254
Office Park	3,653.26	524.64	243.12	9,187,058	9,187,058
Other Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Regional Shopping Center	31,978.86	31,978.86	31978.86	69,165,275	69,165,275
Single Family Housing	3,617.60	3,617.60	3617.60	12,361,889	12,361,889
Total	57,474.46	52,774.84	52,493.33	149,220,518	149,220,518

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	16.60	8.40	6.90	33.00	48.00	19.00	66	28	6
Condo/Townhouse	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Elementary School	16.60	8.40	6.90	65.00	30.00	5.00	63	25	12
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
Office Park	16.60	8.40	6.90	33.00	48.00	19.00	82	15	3
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11
Single Family Housing	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.471808	0.065740	0.172776	0.155900	0.055970	0.009039	0.016651	0.041094	0.001122	0.001334	0.004921	0.000712	0.002932

5.0 Energy Detail

4.4 Fleet Mix

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	1.1495	9.9506	5.1139	0.0627		0.7942	0.7942		0.7942	0.7942		12,540.3903	12,540.3903	0.2404	0.2299	12,616.7090
NaturalGas Unmitigated	1.1495	9.9506	5.1139	0.0627		0.7942	0.7942		0.7942	0.7942		12,540.3903	12,540.3903	0.2404	0.2299	12,616.7090

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	49792	0.5370	4.5887	1.9526	0.0293		0.3710	0.3710		0.3710	0.3710		5,857.8815	5,857.8815	0.1123	0.1074	5,893.5316
Elementary School	2546.76	0.0275	0.2497	0.2097	1.5000e-003		0.0190	0.0190		0.0190	0.0190		299.6189	299.6189	5.7400e-003	5.4900e-003	301.4424
General Office Building	9237	0.0996	0.9056	0.7607	5.4300e-003		0.0688	0.0688		0.0688	0.0688		1,086.7059	1,086.7059	0.0208	0.0199	1,093.3194
Office Park	2690.67	0.0290	0.2638	0.2216	1.5800e-003		0.0201	0.0201		0.0201	0.0201		316.5489	316.5489	6.0700e-003	5.8000e-003	318.4754
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Regional Shopping Center	7172.3	0.0774	0.7032	0.5907	4.2200e-003		0.0534	0.0534		0.0534	0.0534		843.7995	843.7995	0.0162	0.0155	848.9347
Single Family Housing	35154.6	0.3791	3.2397	1.3786	0.0207		0.2619	0.2619		0.2619	0.2619		4,135.8355	4,135.8355	0.0793	0.0758	4,161.0055
Total		**1.1495**	**9.9506**	**5.1139**	**0.0627**		**0.7942**	**0.7942**		**0.7942**	**0.7942**		**12,540.3903**	**12,540.3903**	**0.2404**	**0.2299**	**12,616.7090**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	49.792	0.5370	4.5887	1.9526	0.0293		0.3710	0.3710		0.3710	0.3710		5,857.8815	5,857.8815	0.1123	0.1074	5,893.5316
Elementary School	2.54676	0.0275	0.2497	0.2097	1.5000e-003		0.0190	0.0190		0.0190	0.0190		299.6189	299.6189	5.7400e-003	5.4900e-003	301.4424
General Office Building	9.237	0.0996	0.9056	0.7607	5.4300e-003		0.0688	0.0688		0.0688	0.0688		1,086.7059	1,086.7059	0.0208	0.0199	1,093.3194
Office Park	2.69067	0.0290	0.2638	0.2216	1.5800e-003		0.0201	0.0201		0.0201	0.0201		316.5489	316.5489	6.0700e-003	5.8000e-003	318.4754
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Regional Shopping Center	7.1723	0.0774	0.7032	0.5907	4.2200e-003		0.0534	0.0534		0.0534	0.0534		843.7995	843.7995	0.0162	0.0155	848.9347
Single Family Housing	35.1546	0.3791	3.2397	1.3786	0.0207		0.2619	0.2619		0.2619	0.2619		4,135.8355	4,135.8355	0.0793	0.0758	4,161.0055
Total		**1.1495**	**9.9506**	**5.1139**	**0.0627**		**0.7942**	**0.7942**		**0.7942**	**0.7942**		**12,540.3903**	**12,540.3903**	**0.2404**	**0.2299**	**12,616.7090**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Unmitigated	488.3358	1.2287	105.5916	5.5200e-003		2.2647	2.2647		2.2468	2.2468	0.0000	26,912.7944	26,912.7944	0.7021	0.4900	27,079.4240
Mitigated	488.3358	1.2287	105.5916	5.5200e-003		2.2647	2.2647		2.2468	2.2468	0.0000	26,912.7944	26,912.7944	0.7021	0.4900	27,079.4240

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	108.9179					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	373.6655					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	2.4498	1.1000e-004	0.1336	0.0000		1.6926	1.6926		1.6748	1.6748	0.0000	26,724.7059	26,724.7059	0.5122	0.4900	26,887.3480
Landscaping	3.3026	1.2286	105.4580	5.5200e-003		0.5721	0.5721		0.5721	0.5721		188.0886	188.0886	0.1899		192.0760
Total	**488.3358**	**1.2287**	**105.5916**	**5.5200e-003**		**2.2647**	**2.2647**		**2.2468**	**2.2468**	**0.0000**	**26,912.7944**	**26,912.7944**	**0.7021**	**0.4900**	**27,079.4240**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	108.9179					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	373.6655					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	2.4498	1.1000e-004	0.1336	0.0000		1.6926	1.6926		1.6748	1.6748	0.0000	26,724.7059	26,724.7059	0.5122	0.4900	26,887.3480
Landscaping	3.3026	1.2286	105.4580	5.5200e-003		0.5721	0.5721		0.5721	0.5721		188.0886	188.0886	0.1899		192.0760
Total	**488.3358**	**1.2287**	**105.5916**	**5.5200e-003**		**2.2647**	**2.2647**		**2.2468**	**2.2468**	**0.0000**	**26,912.7944**	**26,912.7944**	**0.7021**	**0.4900**	**27,079.4240**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Vegetation

EXHIBIT 2

SMITH ENGINEERING & MANAGEMENT

August 12, 2016

Mr. Richard Drury
Lozeau Drury
410 12th Street, Suite 250
Oakland, CA 94607

Subject: Renaissance Specific Plan Amendment Draft Subsequent Environmental Impact Report (SCH # 2006071021)

Dear Mr. Drury:

At your request, I have reviewed the Draft Subsequent Environmental Impact Report (the "DSEIR") for the Renaissance Specific Plan Amendment (the "Project") in the City of Rialto (the"City"). My review is specific to the traffic and transportation section of the DSEIR and its supporting appendices.

My qualifications to perform this review include registration as a Civil and Traffic Engineer in California and over 48 years professional consulting engineering practice in the traffic and transportation industry. I have both prepared and performed adequacy reviews of numerous transportation and circulation sections of environmental impact reports prepared under the California Environmental Quality Act (CEQA). My professional resume is attached.

Findings of my review are summarized below.

The DSEIR Defers Mitigation of Significant Traffic Impacts It Discloses, An Action that is Improper Under CEQA

The DSEIR discloses that the Specific Plan Amendment Project would have significant traffic impacts at 27 intersections. It also discloses that the Specific Plan Amendment would cause unsatisfactory level of service on 13 existing or **OR1-45**

5311 Lowry Road, Union City, CA 94587 tel: 510.489.9477 fax: 510.489.9478

OR1-45 Cont.

planned roadway segments but does not identify these as significant impacts because the City has no adopted significance thresholds for roadway segments. The DSEIR does, on DSEIR Tables 4.7-20, 4.7-21 and 4.7-22, identify specific improvement measures that would mitigate significant intersection traffic impacts and eliminate unsatisfactory levels of service on roadway segments. However, the DSEIR does not require implementation of these improvements on some specific timely sequence correlated to logical development sequencing. Instead, the actual mitigation measure proposed, TRANS-1, leaves it up to the City Traffic Engineer to review individual site-specific development proposals, determine whether they would cause LOS failures, and determine what of the improvements listed on the above cited tables the individual development would be responsible for either constructing or making monetary contribution toward the cost of construction. This indefinite future mitigation at the discretion of the City Traffic Engineer constitutes a deferral of mitigation that is improper under CEQA.

OR1-46

With regard to the traffic mitigations required of the Renaissance Marketplace and Planning Area 108 developments, proposed mitigation measures TRANS-2 and TRANS-3 defers definition of explicit traffic mitigation to be provided by these projects to Development Agreements to be entered into by each individual developer and the City. In effect, this transfers definition of mitigation to be provided by the developments from the open public review of this CEQA process to agreements reached in private negotiation between the developer(s) and City officials.

Funding for Necessary Traffic Mitigation Improvements Is Uncertain

OR1-47

Appendix H Table 3-F provides current year cost estimates for needed traffic mitigation measures at intersections, a total of $11,200,127. Some improvements are eligible for funding under San Bernardino County Measure I; others are funded by the Rialto Renaissance Fee Program adopted to fund necessary improvements under the original Renaissance Specific Plan. Together, these sources fund $6,122,337 (54 percent) of the entire cost of intersection traffic mitigations. The other $5,669,131 is not included in a funding mechanism, hence uncertain of funding. Of this total, $3,035,648 is reported to be the “fair share” of RSPA development, but the DSEIR fails to propose a method by which these “fair share” funds are to be secured in a manner that results in timely implementation of mitigation. The remaining $2,663,483 is evidently the ‘fair share’ of other background traffic growth and there is no indication how these funds are going to be made up.

The funding situation is even more uncertain for road segment improvements. Road segment improvements are expected to be the responsibility of adjacent development projects. Hence, if a few key sites do not develop for a lengthy period of time, roadways will have irregular geometry and bottleneck sections or disconnects at key places.

The Conclusion that the Project Would Not Substantially Increase Hazards Due to a Design Feature Is Not Substantiated by Analysis

One of the features of the original Renaissance Specific Plan roadway system was the relocation of Renaissance Parkway from its current alignment to an alignment that would intersect Ayala Drive about twice as far south of the intersection of Ayala with the SR 210 eastbound ramps as the current location of the intersection of Renaissance with Ayala. The current Project eliminates the proposed southerly relocation of Renaissance, leaving the near limits of the Renaissance-Ayala intersection just 375 feet from the limits of the Ayala – SR 210 eastbound ramps intersection. No apparent analysis of whether the closer spacing of these intersections would result in queue storage problems has been performed. The queuing analysis that was performed in the Appendix H Traffic Impact Analysis was limited to determining locations where dual left turn lanes or dedicated right turn lanes were needed. The sheer traffic volumes projected at these intersections give every reason to expect that queues in the through traffic lanes could block access to the turning lanes or even extend into the upstream intersection. Queue storage deficiencies tend to be hazardous conditions. Hence, the conclusion that the Project would not substantially increase hazards due to a design feature is not substantiated. The DSEIR needs to perform a thorough analysis of queues, considering queues in the thru lanes between these intersections. **OR1-48**

Inconsistent Floor Area Ratio Values for Town Center Retail Are Relied Upon In the Traffic Analysis

DSEIR Figure 3-4, the PROPOSED RSP Plan Amendment Area, shows the floor area ratio (FAR – the ratio of building floor area square footage to site square footage) within the Planning Areas (PAs) comprising the Town Center at .25. An inset value in a table on the subject figure shows the same value for the Town Center FAR. However, the corresponding figure in the Appendix H Traffic Impact Analysis (Figure 1-2 in that case) shows Town Center PAs 103 and 104 at FAR .23 and PA 101 at FAR .24 with the inset table on the figure displaying these same values. Still more confusing, Table 1-A of Appendix H, which compares the 2010 RSP to the proposed RSPA land use assumptions indicates that Town Center of 72.2 acres would have 715,275 square feet of retail development. This is equivalent to an FAR of only .2274. If developed at FAR .25 as indicated on DSEIR Figure 3-4, Town Center would have a building square footage of 786,258. This discrepancy of 70,983 square feet of retail is equivalent to 3041 daily trips, 263 pm peak hour trips and 68 am peak hour trips at the trip generation rates used in Appendix H. The traffic analysis must be redone with a clear consistency between the maximum floor area permitted under the RSPA and the floor area assumed in the traffic analysis. **OR1-49**

The DSEIR's Failure To Conduct a Regional Traffic Impact Analysis Is Not Justified By the Fact That the Current Project's Trip Generation Is Similar to That Analyzed in the Original RSP EIR

OR1-50

The DSEIR at page 4.7-7 states *"As explained below, based on the trip generation, and in consultation with City staff, it was determined that it is unlikely that the RSPA Project would have new circulation impacts outside the Specific Plan study area beyond what was disclosed as part of the Renaissance Specific Plan TIA and Final EIR because the project generates approximately the same number of trips and would have a similar trip distribution as what was previously analyzed in the 2010 Renaissance Specific EIR. Only study intersections and roadways segments within the Specific Plan area would be potentially affected".* In short, the notion is that regional effects of the RSPA would remain as disclosed in the 2010 EIR. This conclusion based on the similarity of Project trip generation totals is solely inferential and unsupported by any other evidence. It ignores a critical consideration. The local roadway traffic counts for the 2010 EIR were taken in 2008 or in 2006 and 2007 and factored up to assumed 2008 conditions based on growth rates; the state highway system counts were from 2007. However, in this period of time, SR 210 in the immediate RSP Project area was undergoing reconstruction from a surface highway to a freeway with the north south cross streets being reconstructed as interchanges and overcrossings and much of the surface street infrastructure in both the north-south and east-west directions was discontinuous. Consequently, the traffic baseline conditions against which the Project's regional impacts were measured was of dubious representativeness. As evidence of this, we present the following comparison of Caltrans posted 2007 and 2014 traffic volumes for SR 210.

SR 210 2007 to 2014 Traffic Volume Comparison

Location	2007		2014		% Growth 07-14	
	Daily	Pk. HR.	Daily	Pk. Hr.	Daily	Pk. Hr.
E. of Sierra	12,000	1,150	108,000	8,600	900%	748%
W. of Riverside	19,000	1,850	111,000	8,600	579%	465%
E. of Riverside	27,500	2,650	105,000	8,400	382%	317%
W of I-215	30,000	2,700	106,000	8,500	353%	315%

As can be seen in the table, background traffic volumes on SR 210 have increased in the Project area between 2007 and 2014 by between 353 to 900 percent and peak hour volumes have increased between 315 and 748 percent. Given this change in SR 210 background traffic, even though there may be no meaningful difference in the *amount* of traffic contributed by the RSPA versus the RSP, given the massive change in background traffic on the SR 210, the amount of traffic the RSPA does contribute is clearly likely to have *far more significant consequences* than was RSP traffic measured against the anomalous traffic baseline that was used in the 2010 EIR. In this circumstance, compliance with

the good faith effort to disclose impact that CEQA demands logically requires complete analysis of the regional traffic impacts against the current traffic baseline. The DSEIR is deficient for failing to do this. **OR1-50 Cont.**

The Air Quality/Greenhouse Gas Analysis Traffic Assumptions Are Inconsistent With National and Regional Authoritative Guidance Concerning Trip Generation, Truck Traffic Composition and Mileage and With the DSEIR's Own Traffic Impact Section's Assumptions and City of Rialto's Own Guidelines in these Matters

I have had the opportunity to review the comment letter of our associated consultants, SWAPE, regarding the DSEIR's air quality and greenhouse gas analysis assumptions regarding trip generation, heavy truck percentages of trips and truck trip lengths. I can confirm that, as the SWAPE comments point out:

- that the trip generation assumptions in the DSEIR's air quality and greenhouse gas analysis are inconsistent with the appropriate Institute of Transportation Engineers *Trip Generation* for Land Use Category 150 (Warehouse) that is proposed on PA 108 and that was relied upon in the DSEIR traffic impact analysis and approved by City traffic consultants and staff. Although this site is identified as a "Business Center" in the RSPA, that is clearly not the General Light Industrial land use that was assumed in the AQ and GHG analysis. The Warehouse category is the most appropriate as is evidenced in DSEIR Figure 3-6 and the related narrative text on page 3-8 and also in DSEIR sections 4.7 and Appendix H. **OR1-51**
- The heavy truck traffic proportions of the PA 108 trip generation should be, as pointed out by SWAPE, consistent with the guidance of SCAQMD which is also consistent with the guidance of the City of Rialto "*Traffic Impact Analysis Report Guideline and Requirements"* dated December, 2013 and the assumptions of the Appendix H Traffic Impact Analysis. These provisions assume that 40 percent of the traffic to a Category 150 Warehouse are heavy trucks, with 70 percent of the trucks being 4+ axle trucks, 28 percent 3-axle and 2 percent being 2-axle.
- The trip length guidance provided by SCAQMD is more logical and analysis based than the Project-favorable assumptions of the AQ/GHG study.

The DSEIR simply cannot have it two inconsistent ways, with the traffic study assumptions, that are more readily understood by the public, more conservative in keeping with the good faith effort to disclose impact that CEQA demands and the assumptions of the AQ/GHG analysis about the same considerations more radically favorable to the Project and inconsistent with authoritative guidance. This inconsistency renders the AQ/GHG analysis critically flawed as described in detail in the SWAPE report.

Conclusion

This concludes my current comments on the Renaissance Specific Plan Amendment DSEIR. For the reasons stated above, the DSEIR is unsuitable for certification.

Sincerely,

Smith Engineering & Management
A California Corporation

Daniel T. Smith Jr., P.E.
President

Attachment 1
Resume of Daniel T. Smith Jr., P.E.

SMITH ENGINEERING & MANAGEMENT

DANIEL T. SMITH, Jr.
President

EDUCATION

Bachelor of Science, Engineering and Applied Science, Yale University, 1967
Master of Science, Transportation Planning, University of California, Berkeley, 1968

PROFESSIONAL REGISTRATION

California No. 21913 (Civil) Nevada No. 7969 (Civil) Washington No. 29337 (Civil)
California No. 938 (Traffic) Arizona No. 22131 (Civil)

PROFESSIONAL EXPERIENCE

Smith Engineering & Management, 1993 to present. President.
DKS Associates, 1979 to 1993. Founder, Vice President, Principal Transportation Engineer.
De Leuw, Cather & Company, 1968 to 1979. Senior Transportation Planner.
Personal specialties and project experience include:

Litigation Consulting. Provides consultation, investigations and expert witness testimony in highway design, transit design and traffic engineering matters including condemnations involving transportation access issues; traffic accidents involving highway design or traffic engineering factors; land use and development matters involving access and transportation impacts; parking and other traffic and transportation matters.

Urban Corridor Studies/Alternatives Analysis. Principal-in-charge for State Route (SR) 102 Feasibility Study, a 35-mile freeway alignment study north of Sacramento. Consultant on I-280 Interstate Transfer Concept Program, San Francisco, an AA/EIS for completion of I-280, demolition of Embarcadero freeway, substitute light rail and commuter rail projects. Principal-in-charge, SR 238 corridor freeway/expressway design/environmental study, Hayward (Calif.) Project manager, Sacramento Northeast Area multi-modal transportation corridor study. Transportation planner for I-80N West Terminal Study, and Harbor Drive Traffic Study, Portland, Oregon. Project manager for design of surface segment of Woodward Corridor LRT, Detroit, Michigan. Directed staff on I-80 National Strategic Corridor Study (Sacramento-San Francisco), US 101-Sonoma freeway operations study, SR 92 freeway operations study, I-880 freeway operations study, SR 152 alignment studies, Sacramento RTD light rail systems study, Tasman Corridor LRT AA/EIS, Fremont-Warm Springs BART extension plan/EIR, SRs 70/99 freeway alternatives study, and Richmond Parkway (SR 93) design study.

Area Transportation Plans. Principal-in charge for transportation element of City of Los Angeles General Plan Framework, shaping nations largest city two decades into 21'st century. Project manager for the transportation element of 300-acre Mission Bay development in downtown San Francisco. Mission Bay involves 7 million gsf office/commercial space, 8,500 dwelling units, and community facilities. Transportation features include relocation of commuter rail station; extension of MUNI-Metro LRT; a multi-modal terminal for LRT, commuter rail and local bus; removal of a quarter mile elevated freeway; replacement by new ramps and a boulevard; an internal roadway network overcoming constraints imposed by an internal tidal basin; freeway structures and rail facilities; and concept plans for 20,000 structured parking spaces. Principal-in-charge for circulation plan to accommodate 9 million gsf of office/commercial growth in downtown Bellevue (Wash.). Principal-in-charge for 64 acre, 2 million gsf multi-use complex for FMC adjacent to San Jose International Airport. Project manager for transportation element of Sacramento Capitol Area Plan for the state governmental complex, and for Downtown Sacramento Redevelopment Plan. Project manager for Napa (Calif.) General Plan Circulation Element and Downtown Riverfront Redevelopment Plan, on parking program for downtown Walnut Creek, on downtown transportation plan for San Mateo and redevelopment plan for downtown Mountain View (Calif.), for traffic circulation and safety plans for California cities of Davis, Pleasant Hill and Hayward, and for Salem, Oregon.

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Transportation Centers. Project manager for Daly City Intermodal Study which developed a $7 million surface bus terminal, traffic access, parking and pedestrian circulation improvements at the Daly City BART station plus development of functional plans for a new BART station at Colma. Project manager for design of multi-modal terminal (commuter rail, light rail, bus) at Mission Bay, San Francisco. In Santa Clarita Long Range Transit Development Program, responsible for plan to relocate system's existing timed-transfer hub and development of three satellite transfer hubs. Performed airport ground transportation system evaluations for San Francisco International, Oakland International, Sea-Tac International, Oakland International, Los Angeles International, and San Diego Lindberg.

Campus Transportation. Campus transportation planning assignments for UC Davis, UC Berkeley, UC Santa Cruz and UC San Francisco Medical Center campuses; San Francisco State University; University of San Francisco; and the University of Alaska and others. Also developed master plans for institutional campuses including medical centers, headquarters complexes and research & development facilities.

Special Event Facilities. Evaluations and design studies for football/baseball stadiums, indoor sports arenas, horse and motor racing facilities, theme parks, fairgrounds and convention centers, ski complexes and destination resorts throughout western United States.

Parking. Parking programs and facilities for large area plans and individual sites including downtowns, special event facilities, university and institutional campuses and other large site developments; numerous parking feasibility and operations studies for parking structures and surface facilities; also, resident preferential parking .

Transportation System Management & Traffic Restraint. Project manager on FHWA program to develop techniques and guidelines for neighborhood street traffic limitation. Project manager for Berkeley, (Calif.), Neighborhood Traffic Study, pioneered application of traffic restraint techniques in the U.S. Developed residential traffic plans for Menlo Park, Santa Monica, Santa Cruz, Mill Valley, Oakland, Palo Alto, Piedmont, San Mateo County, Pasadena, Santa Ana and others. Participated in development of photo/radar speed enforcement device and experimented with speed humps. Co-author of Institute of Transportation Engineers reference publication on neighborhood traffic control.

Bicycle Facilities. Project manager to develop an FHWA manual for bicycle facility design and planning, on bikeway plans for Del Mar, (Calif.), the UC Davis and the City of Davis. Consultant to bikeway plans for Eugene, Oregon, Washington, D.C., Buffalo, New York, and Skokie, Illinois. Consultant to U.S. Bureau of Reclamation for development of hydraulically efficient, bicycle safe drainage inlets. Consultant on FHWA research on effective retrofits of undercrossing and overcrossing structures for bicyclists, pedestrians, and handicapped.

MEMBERSHIPS

Institute of Transportation Engineers Transportation Research Board

PUBLICATIONS AND AWARDS

Residential Street Design and Traffic Control, with W. Homburger *et al*. Prentice Hall, 1989.

Co-recipient, Progressive Architecture Citation, *Mission Bay Master Plan*, with I.M. Pei WRT Associated, 1984.

Residential Traffic Management, State of the Art Report, U.S. Department of Transportation, 1979.

Improving The Residential Street Environment, with Donald Appleyard et al., U.S. Department of Transportation, 1979.

Strategic Concepts in Residential Neighborhood Traffic Control, International Symposium on Traffic Control Systems, Berkeley, California, 1979.

Planning and Design of Bicycle Facilities: Pitfalls and New Directions, Transportation Research Board, Research Record 570, 1976.

Co-recipient, Progressive Architecture Award, *Livable Urban Streets, San Francisco Bay Area and London*, with Donald Appleyard, 1979.

From: johnwang89@gmail.com [mailto:johnwang89@gmail.com] **On Behalf Of** John Wang
Sent: Wednesday, October 05, 2016 4:51 PM
To: Gina Gibson; Mike Story
Subject: Renaissance Specific Plan (SCH #2006071021)

ggibson@rialtoca.gov

Re: APNs'0264211150000 (Linden Avenue);
and APNs: 0264211170000, 0264211180000, 0264211190000, 0264212420000 (Baseline Rd.)

Oct-5-2016

Dear Ms. Gibson:

In reply to The Recirculated DSEIR that is now being made available to the public for the Renaissance Specific Plan (SCH #2006071021) I once again write as a concerned property owner. **GP1-1**

I believe the proposed revisions to the Renaissance Specific Plan Amendment will be detrimental to my interests as a land owner and a business operator within the City of Rialto. The new plan contemplates a zoning change to my property from industrial zoning into a public park. This will deny me the opportunity to develop my site (APN 0264211150000) and expand a business that I have established and successfully operated in the city for these past dozen years. **GP1-2**

Moreover, the zone change will potentially expose the northern border of my current business operation (ABLE Storage) to increased instances of vandalism and graffiti. I am also concerned that the land uses contemplated by the specific plan amendment may result in changes to drainage that will carry more water to my buildings, and potentially damage goods stored by my customers. **GP1-3**

I've written about this matter in 2015, but have not received a response from the City. **GP1-4**

I see from the notice that the City will now respond to all comments submitted on the Recirculated Draft SEIR, so I therefore eagerly await your reply.

Thanking you in advance for your response, I remain,

Very truly yours,

John Wang
john@mightydevelopment.com
MIGHTY DEVELOPMENT INC.
3296 E. Guasti Rd., Suite 120
Ontario, CA 91761
(909) 218-8820

Appendix B

CEQA Findings of Fact and Statement of Overriding Considerations

CEQA FINDINGS OF FACT

AND

STATEMENT OF OVERRIDING CONSIDERATIONS

for

Renaissance Specific Plan Amendment

Environmental Assessment Review No. 16-55

(State Clearinghouse No. 2006071021)

Airport Specific Plan Amendment No. 6

Renaissance Specific Plan Amendment No. 3

Tentative Parcel Map No. 19779

Conditional Development Permit No. 823

Conditional Development Permit No. 825

Development Agreement No. 16-01

CITY COUNCIL
CITY OF RIALTO

NOVEMBER 22, 2016

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I. INTRODUCTION

The Recirculated Draft Subsequent Environmental Impact Report (SEIR) prepared for the Renaissance Specific Plan Amendment project identified several significant environmental effects that the proposed project may cause. Some of these significant effects can be fully avoided through the adoption of feasible mitigation measures. Others cannot be avoided by the adoption of such measures or feasible environmentally superior alternatives. However, these effects are outweighed by the overriding considerations, which are included with the Findings for those significant proposed project impacts that cannot be mitigated.

Pursuant to Title 14, California Code of Regulations, Section 15090, the City Council of Rialto (Council) hereby certifies that the Final SEIR for the Renaissance Specific Plan Amendment project (proposed project) has been completed in compliance with the California Environmental Quality Act, Public Resources Code (PRC) Section 21000 et seq. (CEQA), that the Final SEIR was presented to the Council, and that the Council has reviewed and considered the information contained in the Final SEIR prior to approving the proposed project, as set forth below. As part of this certification, the Council hereby finds that the Final SEIR reflects the independent judgment and analysis of the Council and approves the Final SEIR.

II. ENVIRONMENTAL REVIEW PROCESS

CEQA (PRC Section 21000 et seq.) requires state and local government agencies to consider the environmental consequences of projects for which they have discretionary authority. This document, which has been prepared in compliance with the requirements of CEQA and the CEQA Guidelines (California Code of Regulations Title 14 Section 15000 et seq.), sets forth the findings of the City of Rialto (City), the lead agency under CEQA, regarding the proposed project. The document also presents a Statement of Overriding Considerations.

The primary source for this document is the Final Recirculated SEIR (Final SEIR; SCH #2006071021) for the proposed project, and the documents that have been incorporated into the Final SEIR directly or by reference. Full descriptions of the proposed project, associated environmental impacts, mitigation measures, project alternatives, a Mitigation Monitoring and Reporting Program (MMRP) for the proposed project, and other features required under CEQA are contained in the Final SEIR itself.

A Program EIR, the Renaissance Specific Plan (RSP) Environmental Impact Report (RSP EIR; SCH #2006071021) was certified by the Rialto City Council on November 19, 2010. The RSP establishes a comprehensive development policy and provides regulatory guidance for the buildout of the Renaissance Specific Plan Area. In November 2014, Lewis-Hillwood Rialto Company, LLC (LHR), submitted an application to the City for the current proposed project, which if approved and implemented, would develop the site in a different land use pattern from what is currently permitted in the approved RSP, resulting in the need for an amendment to the RSP. This would have the potential to result in major

revisions to the RSP EIR. Therefore, in order to consider the project as proposed, the City chose to prepare a project-level Subsequent EIR (SEIR) pursuant to Section 15162 of the CEQA Guidelines.

The SEIR where applicable, tiers off and incorporates by reference the program-level 2010 RSP EIR. Where applicable and where potential impacts associated with the proposed project were adequately analyzed in the program-level RSP EIR, the SEIR relies on the analysis and findings presented in that document.

To determine the scope of the SEIR, the City prepared a Notice of Preparation. On January 8, 2015, the Notice of Preparation (NOP) for the proposed project was distributed to trustee and responsible agencies, members of the public, other interested parties, and the California Office of Planning and Research, State Clearinghouse. This began the 30-day public review period, which ended on February 6, 2015. A total of two comment letters from a local and State agencies were received. A scoping meeting was held on January 15, 2015 and additional oral comments were received. These comments were considered during the preparation of the Draft SEIR.

The Draft SEIR, with an accompanying Notice of Completion (NOC), was circulated to the State Clearinghouse, trustee agencies, responsible agencies, other government agencies, and interested members of the public for a 45-day review period, extending from July 5, 2016 through August 19, 2016. On August 18, 2016, the City of Rialto Planning Department held a public hearing to receive oral comment on the Draft SEIR. Subsequent to the close of the public comment period for the Draft SEIR, both the City and project Applicant completed additional technical analysis for the project. In an effort to address potential impacts of the proposed project and provide additional opportunity for public input, the City elected to recirculate the Draft SEIR in its entirety for an additional 45 days of public review. The public review period from the Recirculated Draft SEIR was from September 26, 2016 to November 10, 2016. Comments on the Draft SEIR, a list of commenters, and the City's responses to comments are contained in the Final SEIR, which was issued in November 2016.

In addition, the Final SEIR contains the Recirculated Draft SEIR itself, and the applicable mitigation measures from the 2010 RSP Final EIR. Pursuant to CEQA Guidelines §15088(b), the Final SEIR was made available for review by trustee and responsible agencies that provided written comments on the Draft SEIR for a 10-day period, extending from November 21, 2016 to November 30, 2016.

The SEIR for the project consists of the following:

A. Recirculated Draft Subsequent Environmental Impact Report ("Draft SEIR"), issued September 26, 2016;

B. All appendices to the Recirculated Draft SEIR;

C. Final SEIR, issued November 2016, containing all written comments and responses on the Draft SEIR, refinements and clarifications to the Draft SEIR, the mitigation monitoring and reporting program, and technical appendices;

D. All of the comments and staff responses entered into the record orally and in writing, as well as accompanying technical memoranda or evidence entered into the record.

The Final SEIR did not provide any significant new information regarding proposed project or cumulative impacts or mitigation measures beyond that contained in the Draft SEIR. The City therefore properly decided not to recirculate the Final SEIR for additional public review.

In conformance with CEQA, the City has taken the following actions in relation to the SEIR:

A. On November 30, 2016, the Planning Commission conducted a duly and properly noticed public hearing on the project and the SEIR, and recommended that the City Council certify the SEIR and approve the RSP Amendment as proposed.

B. On December 13, 2016, at a duly and properly noticed public hearing, the City Council certified the SEIR and adopted findings, Mitigation Monitoring and Reporting Program, and Statement of Overriding Considerations related to the proposed RSP Amendment.

III. PROJECT DESCRIPTION

A. Project Location

The Renaissance Specific Plan ("RSP") planning area is located in the City of Rialto, California. The City of Rialto is located in western San Bernardino County, approximately 60 miles east of Los Angeles and 100 miles north of San Diego. The proposed project is an amendment to the approved 2010 RSP and the proposed project site is located within the previously approved RSP planning area. The project site is generally bounded on the north by Casmalia Street, on the south by Baseline Road, on the east by Ayala Drive, and on the west by Tamarind Avenue.

B. Site Characteristics

The majority of the RSP planning area is currently vacant or undeveloped. Parcels within and facilities of the Rialto Municipal Airport, which ceased operations in 2014, occupy most the site. The former airport area including the former runway and associated taxiways have been demolished and removed from the area. Therefore, with the exception of the runway and former associated airport facilities on the southern portion of RSP planning area, the area is largely vacant, with the exception of new warehouse developments that have been constructed in the southern portion of the planning area. A City fire station is located on the site, west of Ayala Drive and north of Leiske Drive. Existing commercial and industrial structures and associated uses exist in the southeastern portion of the project site. No existing residential uses are located on the project site. The project site is generally flat, draining to the south. Existing vegetation consists of an assortment of native and non-native shrubs and grasses. Numerous paved and unpaved roads traverse the RSP Planning Area.

C. Project Characteristics

On November 9, 2010, the City of Rialto approved the 2010 RSP consisting of approximately 1,445.3 gross acres located within the western/central portion of the City. The Specific Plan is planned as an integrated community of varied housing types located near and linked to places of employment, retail outlets, services and schools. The RSP at the time of approval was planned to accommodate 16.2 million square feet of business and commercial uses (835,200 square feet of which were existing and would remain), 1,667 residential units, one school, a community park, and multiple neighborhood parks all located in proximity to one another and organized in a grid pattern.

To address the potentially significant impacts associated with implementation of the 2010 RSP, the City prepared the 2010 RSP Draft and Final EIR in accordance with the CEQA. The RSP EIR was released for public review on May 3, 2010; the 2010 RSP Final EIR was certified on November 9, 2010. Since certification of the 2010 RSP Final EIR, six addendums to the Final EIR have been prepared and undergone respective CEQA review and approval. They are: Golden Bear Regional Food Distribution Center Project Addendum (2012), SR-210 Logistics Center II Project Addendum (2013), Rialto 42 Distribution Center Project Addendum (2013), Medline Project Addendum (2015), Niagara Project Addendum (2015), and SR-210 Logistics Center III Project Addendum (2015).

The proposed project is an amendment to the 2010 RSP. The proposed RSP Amendment would allow for the relocation of business and industrial uses to the west of Linden Avenue, the relocation of all residential land uses and the public park to the east of the Linden Avenue, and implementation of the Renaissance Marketplace retail development and the Planning Area 108 industrial/warehouse development. The purpose of relocating some land use is to create a more efficient land use plan and to cluster similar land use types.

Proposed project details include the following:

- An update of the 2010 Renaissance Specific Plan and related texts and figures throughout the RSP
- Updates to residential development standards to reflect housing trends
- Relocation of all residential land uses to the east of Linden Avenue
- Relocation of Business Center land use to west of Linden Avenue
- Precise Plan of Design for the Renaissance Marketplace retail development
- Precise Plan of Design for the Planning Area 108 industrial/warehouse development
- Change in Land Use in Planning Area 19 from Freeway Commercial to Freeway Incubator
- Change FAR of Corp Center from .75 to .50
- Develop potential interim storm drain basins

- Maintain Renaissance Parkway in its current alignment
- Revised Sign Standards for freeway pylon signs
- Revised street sections
- Terminate Miro Way east at Linden Avenue
- Increased public park area from 16.0 acres to 20.0 acres
- Relocation of public school site to east side of Linden Avenue

Related updates to the 2010 RSP text and figures are required based upon the revised land use plan as proposed by the RSP Amendment. However, the land uses proposed by the RSP Amendment represent a re-distribution of previously-identified land uses in the RSP. The total acreage of the RSP increased from 1,435.5 acres to 1,450.6 due to more accurate survey data of the project area since its original adoption.

As a component of the proposed project, the Applicant is proposing the development of the Renaissance Marketplace. The approximately 566,764-square-foot retail center would include a major retail sites, as well as other uses that could include, a health club, a movie theater, restaurants, a gas station, a day care center, a drug store, and additional in-line retail. Access to the Renaissance Marketplace would be provided from Renaissance Parkway, Ayala Drive, Linden Avenue and a proposed street that would provide access to the residential planning areas south of the Renaissance Marketplace. Marketplace PPD identifies maximum square footage, streets cross sections and entrance locations. Building footprints, site layout, design features and parking may be subject to modification as development occurs. The Renaissance Marketplace would be constructed in two phases.

The Planning Area 108 component of the proposed project would be developed with up to approximately 4 million square feet of industrial/warehouse uses. The development would include three buildings, each between 1.2 and 1.4 million square feet. Planning Area 108 is located on the north side of Miro Way between Locust and Linden Avenues. Access to the proposed industrial/warehouse uses would be provided by four driveways on Locust Avenue, three driveways on Linden Avenue, and one driveway on Miro Way.

The RSP Amendment would also maintain Renaissance Parkway in its current alignment, without modifying it as proposed by the existing Land Use Plan for the RSP. Existing utilities in Renaissance Parkway will remain, except those that require relocation to within the street right-of-way. The project also contemplates revisions to the RSP Sign Standards to allow additional freeway pylon signs along Renaissance Parkway and the Interstate 210 Freeway. Street sections for the project have also been updated to provide additional width for bike travel lanes and median widths for turning movements.

The proposed project is also expected to need interim drainage basins due to downstream facilities not yet completed by outside agencies. The proposed project would provide an alternative interim drainage facility for the Renaissance Marketplace, within Planning Area 115 (as newly-designated by the RSP

Amendment), should downstream facilities be determined to not be eligible for stormwater flows. The high density unit count in Planning Area 115 may be reduced if the interim detention basin is needed beyond the planned buildout of high density residential in Planning Area 115.

The proposed project will include a Development Agreement that identifies the impact fees to be paid by the applicant, as well as the timing and funding of improvements that are already identified as part of the project. The Development Agreement would also identify the legal obligations of both parties in terms of performance, assignments, liability, etc.

IV. SIGNIFICANT EFFECTS AND MITIGATION MEASURES

The Final SEIR analyzed proposed project impacts in the following eight environmental topic areas: Aesthetics; Air Quality; Biological Resources; Greenhouse Gases; Hydrology and Water Quality; Noise; Transportation and Traffic; and Utilities. Potentially significant or significant impacts were identified in all these areas. With implementation of proposed project-specific mitigation measures, potentially significant impacts would be reduced to less-than-significant levels, with the exception of impacts on Air Quality and Greenhouse Gas Emissions. However, these impacts are outweighed by overriding considerations, which are presented later in this findings document.

The following discussion elaborates on potentially significant and significant impacts identified in the Renaissance Specific Plan Amendment Final SEIR and mitigation measures proposed for those impacts. Additional discussion of less-than-significant impacts is not provided; however, mitigation measures set forth in the 2010 RSP Final EIR to reduce less-than-significant impacts are included in the proposed project approval along with the mitigation measures described below.

A. Aesthetics

1. Potentially Significant Impacts Reduced to Less Than Significant Levels

Impact 4.1-1: The project would substantially alter the existing visual character of the project site.

Existing conditions on the project site, vacant areas of sparse vegetation and/or vacant, abandoned and demolished former airport facilities, and overhead transmission lines are considered as having negative visual characteristics. Thus, while RSP development on the proposed project site, including the Renaissance Marketplace and Planning Area 108 components, would substantially alter the existing visual character of the project site, the proposed development can be considered an improvement in the visual characteristic of the project site.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the following mitigation measure as identified in the Final EIR and incorporated into the project.

Mitigation Measures

The following mitigation measures are required to reduce the proposed project's impacts to a less than significant level:

Mitigation Measure AES-1 Prior to the issuance of grading permits or improvement plans, the project applicant shall submit to the satisfaction of the Public Works Director, evidence that all electrical distribution lines of 16,000 volts or less, telephone lines, cable antenna television and similar service wires or cable, which provide direct service to the property being developed, shall be installed underground.

Reference: Section 4.1 of the Recirculated Draft SEIR.

B. Air Quality

1. Potentially Significant Impacts Reduced to Less Than Significant Levels

Impact 4.2.3: The Project would not violate any air quality standard or contribute substantially to an existing or protected air quality violation.

Renaissance Marketplace

Table 4.2-13 shows that the construction emission rates would not exceed the Localized Significance Thresholds (LSTs) for the existing and proposed residences 100 feet (30 meters) from the boundary of Renaissance Marketplace. Table 4.2-13 also shows that the emissions of the pollutants will result in concentrations of pollutants at these nearest residences that are all below the South Coast Air Quality Management District (SCAQMD) thresholds of significance.

Table 4.2-13 Construction Localized Impacts Analysis – Renaissance Marketplace

Emissions Sources	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions[1]	75	49	10	6.6
LST Thresholds	276	1,876	20	8.4
Significant Emissions?	**No**	**No**	**No**	**No**

Note: SRA – Central San Bernardino Valley, 5 acres, receptors at 30 meters.
[1] CalEEMod clearly delineates the on-site and off-site construction emissions, thus this includes all on-site construction emissions without having to include a percentage of the mobile source emissions as is done for the operational LST.
CO = carbon monoxide
lbs/day = pounds per day
LST = local significance threshold
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SRA = Source Receptor Area

Source: Compiled by LSA Associates, Inc. (2016).

Table 4.2-14 shows that the operational emission rates would not exceed the LSTs for residences in the project area within the 100 feet (30 meters) distance for LST analyses. Therefore, the proposed operational activity for the Renaissance Marketplace would not result in a locally significant air quality impact.

Table 4.2-14 Long-Term Operational Localized Impacts Analysis – Renaissance Marketplace

Emissions Sources	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Proposed Renaissance Marketplace				
On-Site Emissions	8.5	32	4.4	1.3
LST Thresholds	276	1,876	5.4	2.0
Significant Emissions?	**No**	**No**	**No**	**No**

Note: SRA – Central San Bernardino Valley, 5 acres, receptors at 30 meters, on-site traffic 5% of total.
CO = carbon monoxide
lbs/day = pounds per day
LST = Local Significance Thresholds
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SRA = Source Receptor Area

Source: Compiled by LSA Associates, Inc. (2016).

Planning Area 108

Table 4.2-15 shows that the construction emission rates would not exceed the LSTs for the residences 100 feet (30 meters) from the boundary of Planning Area 108. Table 4.2-15 also shows that the emissions of the pollutants will result in concentrations of pollutants at these nearest residences that are all below the SCAQMD thresholds of significance.

Table 4.2-15 Construction Localized Impacts Analysis – Planning Area 108

Emissions Sources	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions[1]	75	49	10	6.6
LST Thresholds	276	1,876	20	8.4
Significant Emissions?	**No**	**No**	**No**	**No**

Note: SRA – Central San Bernardino Valley, 5 acres, receptors at 30 meters.

[1] CalEEMod clearly delineates the on-site and off-site construction emissions, thus this includes all on-site construction emissions without having to include a percentage of the mobile source emissions as is done for the operational LST.

CO = carbon monoxide
lbs/day = pounds per day
LST = local significance threshold
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SRA = Source Receptor Area

Source: Compiled by LSA Associates, Inc. (2016).

Table 4.2-16 shows that the operational emission rates would not exceed the LSTs for residences in the vicinity of Planning Area 108 that are within the 400 feet (122 meters) distance for LST analyses. Therefore, the proposed operational activity for the Planning Area 108 would not result in a locally significant air quality impact.

Table 4.2-16 Long-Term Operational Localized Impacts Analysis – Planning Area 108

Emissions Sources	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions	58	45	7.6	3.1
LST Thresholds	681	21,297	45	22
Significant Emissions?	**No**	**No**	**No**	**No**

Note: SRA – Central San Bernardino Valley, 5 acres, receptors at 400 feet or 122 meters, on-site traffic 5% of total.
CO = carbon monoxide
LST = Local Significance Threshold
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SRA = Source Receptor Area

Source: Compiled by LSA Associates, Inc. (2016).

CO Hot Spot

As described in the Traffic Impact Study prepared for the Renaissance Marketplace (LSA 2015), all study area intersections currently operate at satisfactory LOS. With addition of the Renaissance Marketplace, all study area intersections would continue to operate at satisfactory LOS. Therefore, the Renaissance Marketplace can be implemented with no significant peak-hour intersection impacts. Given the low level of CO concentrations in the Specific Plan area and no traffic impacts at any intersections, Renaissance Marketplace project-related vehicles are not expected to contribute significantly to or result in the CO concentrations exceeding the State or federal CO standards. Because no CO hot spot would occur, there would be no Renaissance Marketplace project-related impacts on CO concentrations.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the following mitigation measures as identified in the Final EIR and incorporated into the project.

Mitigation Measures

The following mitigation measures are required to reduce the proposed project's impacts to a less than significant level:

Mitigation Measure AQ-1 - Standard Air Quality Conditions

Construction Activity

Prior to the issuance of grading permits or improvement plans, the project applicant shall submit to the satisfaction of the Public Works Director, evidence that development within the Renaissance Marketplace and Planning Area 108 will comply with regional rules that assist in reducing short-term air pollutant emissions. SCAQMD Rule 403 requires that fugitive dust be controlled with best-available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. Applicable dust suppression techniques from Rule 403 are summarized below. Implementation of these dust suppression techniques can reduce the fugitive dust generation (and thus the PM10 component). Compliance with these rules would reduce impacts on nearby sensitive receptors (see SCAQMD Rule 403).1

The applicable Rule 403 measures are as follows:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Water active sites at least twice daily. (Locations where grading is to occur will be thoroughly watered prior to earthmoving.)
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 ft) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code (CVC) Section 23114.
- Pave construction access roads at least 100 ft (30 m) onto the site from the main road.
- Exterior windows shall utilize window treatments for efficient energy conservation.
- Reduce traffic speeds on all unpaved roads to 15 mph or less.

The applicable California Department of Resources Recycling and Recovery (CalRecycle) Sustainable (Green) Building Program Measures are:

[1] South Coast Air Quality Management District (SCAQMD). Rule 403. Website: http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf, accessed October 2015.

- Recycle/reuse at least 50 percent of the construction material including, but not limited to, soil, mulch, vegetation, concrete, lumber, metal, and cardboard. [2]
- Use "green building materials" such as those materials that are rapidly renewable or resource-efficient, and recycled and manufactured in an environmentally friendly way, for at least 10 percent of the project.

Operations

Prior to the issuance of building permits, the project applicant shall submit to the satisfaction of the Public Works Director, evidence that development within the Renaissance Marketplace and Planning Area 108 comply with Title 24 of the California Code of Regulations (CCR) established by the CEC regarding energy conservation and green buildings standards. The project applicant shall incorporate the following in building plans:

- Low-emission water heaters shall be used. Solar water heaters are encouraged.
- Exterior windows shall utilize window treatments for efficient energy conservation.

These measures will result in reduced emissions during the construction and operation phases of t the proposed Renaissance Marketplace and Planning Area 108 projects.

Mitigation Measure AQ-2: Sensitive Receptors – 500-Foot Buffer

Prior to the issuance of any grading permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the following uses will not be located within the distance specified from an existing or future sensitive receptor (residence, school, hospital, nursing home, day care centers, parks and playgrounds): within 500 feet of the 210 Freeway; within 500 feet of the equipment within a dry cleaning facility utilizing Perchloroethylene; and within 300 feet of a fueling station facility (i.e. fuel pumps). These facilities may be located closer than the proscribed distances if a project-specific health risk assessment is performed that demonstrates that the project-specific health risk impacts do not exceed the South Coast Air Quality Management District's health risk significance thresholds.

Mitigation Measure AQ-3: Sensitive Receptors – 1,000-Foot Buffer

Prior to the issuance of any grading permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the following uses will not be located within 1000 feet of a nearby sensitive receptor (occupied portions of existing or future residences, schools, hospitals, nursing homes, day care centers, parks, and playgrounds): a warehouse, distribution center, or logistics center unless a project-specific health risk assessment is performed that demonstrates that the project-specific health risk impacts do not exceed the South Coast Air Quality Management District's

[2] California Department of Resources Recycling and Recovery (CalRecycle). Construction and Demolition Debris Recycling. Website: http://www.calrecycle.ca.gov/ConDemo, accessed October 2015.

health risk significance thresholds.

Mitigation Measure AQ-4: Off-Road Diesel Equipment

Prior to the issuance of any grading permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that offroad diesel-powered construction equipment greater than 50 horsepower will meet the Tier 4 emission standards, where feasible. In addition, where feasible all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the Air Resources Board (ARB). Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by ARB regulations.

Mitigation Measure AQ-5: Construction Equipment Tier Specification

Prior to the mobilization of each applicable offroad diesel-powered construction equipment greater than 50 horsepower, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, a copy of the certified tier specification, Best Available Control Technology (BACT) documentation, and Air Resources Board or South Coast Air Quality Management District's operating permit for each shall be provided at the time of mobilization of each applicable unit of equipment.

Mitigation Measure AQ-6: Truck Building Access

Prior to the issuance of any grading permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the following truck access routes have been incorporated into the project design, to the maximum extent practicable, to reduce air quality and potential future health risk impacts from the operation phases of the proposed project:

- Design warehouse/distribution centers such that entrances and exits discourage that trucks from traversing past neighbors or other sensitive receptors.
- Design warehouse/distribution centers such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility.
- Establish area(s) within the facility for repair needs.
- Provide electrical service capacity for equipment at facilities.

Mitigation Measure AQ-7: Truck Routes

Prior to the issuance of any grading permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the following truck access routes have been

incorporated into the project design, to the maximum extent practicable, to reduce air quality and potential future health risk impacts from the operation phase of the proposed project, if feasible:

- Develop, adopt and enforce truck routes both for entering and leaving the city and in and out of facilities; keeping in mind common pedestrian routes, especially for schools.
- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas.
- Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride.
- Where there are traffic impacts, improve traffic flow by signal synchronization.

Mitigation Measure AQ-8: Super-Compliant VOC Paints

Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the construction contractor shall be required to utilize Super-Compliant VOC paints, which are defined by SCAQMD as meeting the "super-compliant" VOC standard of 10 grams per liter (g/L). Use of HVLP or electrostatic spray equipment shall be encouraged.

Mitigation Measure AQ-9: Exterior and Interior Finishes

Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that exterior and interior finishes that do not require painting shall be used where feasible.

Mitigation Measure AQ-10: Building Orientation

Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that buildings have been oriented and incorporate landscaping to maximize passive solar; heating during cool seasons, and minimize solar heat gain during hot seasons where feasible depending upon site condition and topography.

Mitigation Measure AQ-11: Title 24 Standards

Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the building design has met the requirements of 2016 Title 24 standards for building and site efficiency to reduce energy and water usage.

Mitigation Measure AQ-12: Energy Efficiency Education

Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that building tenants shall be encouraged to educate employees on energy efficiency measures.

Mitigation Measure AQ-13: Preferential Parking Spaces

Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that preferential parking spaces shall be offered to car pools and van pools.

Mitigation Measure AQ-14: Electrical Hookup Capacity

Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that building designs provide electrical capacity for installation of electrical hookups at onsite loading docks and for electric vehicle charging stations.

Mitigation Measure AQ-15: Warehouse Employee Amenities

Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that warehouse and industrial buildings that exceed 500,000 square feet provide on-site food vending machines, refrigerator, and microwave for project employees.

Impact 4.2.3 The project would expose sensitive receptors to substantial pollutant concentrations.

Acute (Short-Term) Risk Level

Exposure to diesel exhaust can result in immediate health effects. Diesel exhaust can irritate the eyes, nose, throat, and lungs, and can cause coughs, headaches, lightheadedness, and nausea. In studies with human volunteers, diesel exhaust particles made people with allergies more susceptible to the materials to which they were allergic, such as dust and pollen. Exposure to diesel exhaust also causes inflammation in the lungs, which may aggravate chronic respiratory symptoms and increase the frequency or intensity of asthma attacks. Emissions from gasoline-powered vehicles also contain HAPs with short-term acute health effects, see Appendix B of Appendix C of this Recirculated Draft SEIR for details. The acute inhalation health risks from all sources to the residents both on the RSPA and near the proposed project are shown in Table 4.2-17, The maximum acute Hazard Index would be 0.33, which is below the threshold of 1.0. Therefore, the potential for short-term acute exposure would be less than significant.

Carcinogenic and Chronic (Long-Term) Risk Levels

Table 4.2-17 also shows the results for long-term carcinogenic and chronic impacts to both adult and child

residents. The adult residential carcinogenic health risk level is shown for the period of 30 years, which includes the assumption that a person would stay at home 24-hours a day, 7 days a week, 48 weeks out of a year for 30 years. Table 4.2-17 shows that the MEIR would be 1.1 in 1 million, below the threshold of 10 in 1 million and thus less than significant. Appendix B of Appendix C of this Recirculated Draft SEIR includes a figure showing the 30-year cancer isopleths. The child residential carcinogenic health risk level is 0.87 in a million, also less than significant.

Table 4.2-17 Health Risks from RSPA Operations

Risk Category	Carcinogenic Health Risk	Chronic Health Index	Acute Health Index
30-Year Residential Adult Risks (MEIR)	1.1 in 1 million	0.0012	0.33
9-Year Residential Child Risks	0.87 in 1 million		
Threshold	10 in 1 million	1.0	1.0

Source: LSA Associates, Inc., August 2016.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the following mitigation measures as identified in the Final EIR and incorporated into the project.

Mitigation Measures

The following mitigation measures are required to reduce the proposed project's impacts to a less than significant level:

Implementation of Mitigation Measures AQ-1 through AQ-15 would reduce potential impacts to less than significant.

2. Significant and Unavoidable Impacts

Impact 4.2.1: The project would conflict with or obstruct implementation of the applicable air quality plan

- Construction air emissions: Construction of the Project would exceed the South Coast Air Quality Management District's (SCAQMD's) regional significance emission thresholds for Volatile Organic Compound (VOC), Carbon Monoxide (CO), Nitrogen Oxides (NOx), PM10, and PM2.5 emissions

during one or more of the Project's construction periods from 2009 to 2019 after application of mitigation measures.

- Operational air emissions: During all operational phases, the operation of the proposed Project would exceed the SCAQMD's regional significance emission thresholds for VOC, NOx, CO, PM10, and PM2.5 after application of mitigation measures.

As shown in Table 4.2-4, operational emissions for criteria pollutants would exceed the SCAQMD emissions thresholds of VOC, NOX, CO, PM10, and PM2.5 under the previously approved RSP. As shown in Table 4.2-4 the operational emissions for the proposed RSP Amendment increase for criteria pollutants. This increase primarily due to a substantial increase in vehicle usage compared to what was calculated in 2010, based on the City's updated methodology for assuming higher volume of truck trips from warehouse uses, and also due to more concentrated business center land use. These increases result in operational emissions that would exceed the SCAQMD daily thresholds of VOC, NOX, CO, PM10, and PM2.5; however, emissions of SOX would remain lower than the SCAQMD emission threshold. As shown in Table 4.2-4 these result are consistent with the conclusions reported in the 2010 Renaissance Specific Plan EIR. As such, the proposed project would exceed SCAQMD regional significance thresholds for criteria pollutants, similar to the findings in 2010 RSP EIR, these impacts are considered significant and unavoidable.

Table 4.2-4 Opening Year Regional Operational Emissions - 2010 Approved RSP and the Proposed RSPA

Source	Pollutant Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2010 Approved RSP Non-Warehouse Land Uses						
Area Sources	586	1.6	139	<0.01	3.0	3.0
Energy Sources	1.5	13	6	0.1	1.0	1.0
Mobile Sources	199	604	2,241	5.3	351	99
2010 Approved RSP Warehouse Land Uses						
Area Sources	158	<0.01	0.63	<0.01	<0.01	<0.01
Energy Sources	1.7	16	13	0.09	1.2	1.2
Mobile Sources (Trucks)	202	3,620	2,011	11	357	139
Mobile Sources (Passenger Cars)	51	67	876	1.9	164	44
Approved RSP Total Emissions	**1,198**	**4,322**	**5,288**	**18**	**877**	**287**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Significant Impacts?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**
Proposed RSPA Non-Warehouse Land Uses						
Area Sources	467	1.2	106	<0.01	2.3	2.2
Energy Sources	1.1	10.0	5.1	0.06	0.79	0.79
Mobile Sources	204	585	2,192	5.0	334	94
Proposed RSPA Warehouse Land Uses						
Area Sources	385	0.01	1.5	<0.01	<0.01	<0.01
Energy Sources	3.7	34	28	0.20	2.6	2.6

Table 4.2-4 Opening Year Regional Operational Emissions - 2010 Approved RSP and the Proposed RSPA

Source	Pollutant Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Mobile Sources (Trucks)	492	8,823	4,901	26	870	339
Mobile Sources (Passenger Cars)	124	164	2,134	4.6	400	108
Proposed RSPA Total Emissions	**1,676**	**9,616**	**9,367**	**36**	**1,609**	**547**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Significant Impacts?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**
Net Change	**478**	**5,294**	**4,079**	**18**	**732**	**259**
New Significant Impacts?	**No**	**No**	**No**	**No**	**No**	**No**

CO = carbon monoxide
lbs/day = pounds per day
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
RSP = Renaissance Specific Plan
RSPA = Renaissance Specific Plan Amendment
SCAQMD = South Coast Air Quality Management District
SO_x = sulfur oxides
VOC = volatile organic compounds

Source: Compiled by LSA Associates, Inc. (2016).

Renaissance Market Place

Table 4.2-7 shows that daily regional construction emissions would not exceed the daily thresholds of most criteria pollutant emission thresholds established by the SCAQMD, except for the emissions of VOC, which are expected to exceed the SCAQMD daily emission threshold for VOC (i.e., 75 lbs/day) during the construction of Renaissance Marketplace. Since the construction emissions predicted for the construction of the overall RSP would already exceed the daily emissions threshold of VOC, the impact remains significant and unavoidable.

Table 4.2-7 Short-Term Regional Construction Emissions – Renaissance Marketplace

Construction Phase	Total Regional Pollutant Emissions (lbs/day)								
	VOC	NO_X	CO	SO_X	Fugitive PM_{10}	Exhaust PM_{10}	Fugitive $PM_{2.5}$	Exhaust $PM_{2.5}$	CO_2e
Site Preparation	5.2	55	42	0.042	7.2	2.9	3.9	2.7	4,300
Grading	6.6	75	51	0.065	3.6	3.6	1.5	3.3	6,700
Building Construction	12	73	130	0.027	15	2.7	3.9	2.5	25,000
Architectural Coating	120	3.6	17	0.033	2.4	0.21	0.63	0.21	2,800
Paving	3.6	20	16	0.024	0.17	1.1	0.045	1.0	2,500
Peak Daily	**130**	**77**	**150**	**0.30**	**20**		**7.2**		**28,000**
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**		**55**		**No Threshold**
Significant Emissions?	**Yes**	**No**	**No**	**No**	**No**		**No**		

CO = carbon monoxide
CO_{2e} = carbon dioxide equivalent
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOC = volatile organic compounds

Source: Compiled by LSA Associates, Inc. (2016).

Table 4.2-8 shows that three of the SCAQMD emission thresholds for criteria pollutants would be exceeded by the Renaissance Marketplace operations-related emissions. Since the operational emissions predicted for the overall RSP project (Table 4.2-4) would exceed the daily emissions thresholds of these criteria pollutants, the impact remains significant and unavoidable.

Table 4.2-8 Opening Year Regional Operational Emissions – Renaissance Marketplace

Source	Opening Year Regional Pollutant Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Proposed Renaissance Marketplace						
Area Sources	61	0.0037	0.39	0.00003	0.0014	0.0014
Energy Sources	0.9	8.2	6.9	0.049	0.62	0.62
Mobile Sources	70	170	640	1.3	89	26
Total Project Emissions	**130**	**180**	**650**	**1.3**	**89**	**26**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Exceed SCAQMD Thresholds?	**Yes**	**Yes**	**Yes**	**No**	**No**	**No**

CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOC = volatile organic compounds

Source: Compiled by LSA Associates, Inc. (2016).

Planning Area 108

Table 4.2-11 shows that daily regional construction emissions would not exceed the daily thresholds of most criteria pollutant emission thresholds established by the SCAQMD, with the exception of VOC and NOx, which are expected to exceed the SCAQMD's daily emission thresholds during the construction of Planning Area 108. Since the construction emissions predicted for the construction of the RSP would exceed the daily emissions threshold of VOC and NOx, and the impact remains significant and unavoidable.

Table 4.2-11 Short-Term Regional Construction Emissions – Planning Area 108

Construction Phase	VOC	NO_X	CO	SO_X	Fugitive PM_{10}	Exhaust PM_{10}	Fugitive $PM_{2.5}$	Exhaust $PM_{2.5}$
Site Preparation	5.2	55	42	0.042	7.2	2.9	3.9	2.7
Grading	6.6	75	51	0.065	3.6	3.6	1.5	3.3
Building 1 Construction	22	130	280	0.57	33	3.5	8.9	3.3
Building 1 Architectural Coating	260	5.1	35	0.071	5.4	0.24	1.4	0.23
Paving	3.5	22	16	0.024	0.17	1.3	0.045	1.2
Building 2 Construction	20	120	260	0.57	33	3.2	8.9	3
Building 2 Architectural Coating	300	4.6	32	0.071	5.4	0.21	1.4	0.21
Building 3 Construction	18	100	240	0.57	33	2.8	8.9	2.6
Building 3 Architectural Coating	290	4.2	29	0.071	5.4	0.19	1.4	0.19
Peak Daily	**320**	**140**	**320**	**0.64**	**42**		**14**	
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**		**55**	
Significant Emissions?	**Yes**	**Yes**	**No**	**No**	**No**		**No**	

CO = carbon monoxide
PM_{10} = particulate matter less than 10 microns in size

Construction Phase	VOC	NO_X	CO	SO_X	Fugitive PM_{10}	Exhaust PM_{10}	Fugitive $PM_{2.5}$	Exhaust $PM_{2.5}$

CO_2e = carbon dioxide equivalent
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SCAQMD = South Coast Air Quality Management District
SOx = sulfur oxides
VOC = volatile organic compounds

Source: Compiled by LSA Associates, Inc. (2016).

Table 4.2-11 shows that five of the SCAQMD emission thresholds for criteria pollutants would be exceeded by Planning Area 108-related emissions. Since the operational emissions predicted for the RSP, as shown earlier in Table 4.2-4, would exceed the daily emissions thresholds of these criteria pollutants, the impact remains significant and unavoidable.

Table 4.2-12 Opening Year Regional Operational Emissions – Planning Area 108

Source	Pollutant Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	140	0.0072	0.76	0.00006	0.0027	0.0027
Energy Sources	6.1	56	47	0.33	4.2	4.2
Mobile Sources (Cars)	34	44	578	1.2	108	29
Mobile Sources (Trucks)	126	2,312	1,278	6.5	228	84
Warehouse Equipment	1.3	11	7.5	<0.01	0.9	0.83
Total Project Emissions	**308**	**2,412**	**1,904**	**8.1**	**341**	**118**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Exceed SCAQMD Thresholds?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**

CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOC = volatile organic compounds

Source: Compiled by LSA Associates, Inc. (2016).

Impact 5.3.2: The Project would result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standards (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Because construction and operational emissions would exceed SCAQMD thresholds, the proposed Project would have significant cumulative air quality impacts. No further mitigation is available to reduce this impact to a less than significant level.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which substantially lessen the environmental effect as identified in the Final EIR.

Pursuant to CEQA Guidelines Section 15091 (a)(3), there are no feasible alternatives to the project because of specific economic, legal, social, technological or other considerations, including the provision of employment opportunities for highly trained workers.

After imposition of Mitigation Measures AQ1-AQ6, there are no additional, feasible mitigation measures which can mitigate this impact to a level below significance. Pursuant to CEQA Guidelines Section 15093, therefore, the City has balanced the economic, legal, social, technological and other benefits of the project against its unavoidable environmental risks, and has determined that this impact is acceptable for the reasons stated in the Statement of Overriding Considerations.

Facts in Support of Findings

All feasible mitigation measures to address air quality impacts related to construction emissions will be imposed upon the project by the Final EIR. The project emissions during construction and operation after application of Mitigation Measures AQ-1 through AQ-6 are summarized above. Due to the size and nature of the project the combined construction and operations VOC, NOx, CO, PM10, and PM2.5 emissions will remain significant even with the mitigation imposed. As discussed in Section V, reducing the size of the project to lower emissions to a level is not feasible because it would prevent the attainment of key project objectives. Specifically, objectives related to redeveloping the former Rialto Municipal Airport, facilitating development of the Renaissance Marketplace, and the Planning Area 108 industrial/warehouse project. While the City of Rialto has land use authority, this project is an infill location and an appropriate location for development and its significant emissions are from on-road mobile sources which are regulated at the state and federal levels and, therefore, are outside of the jurisdiction and control of local agencies such as the City of Rialto and local regulation of emissions from vehicles is infeasible and unenforceable.

Nonetheless, implementation of the proposed project would exceed the SCAQMD thresholds for criteria pollutants. The Air Quality Management Plan (AQMP) is based on regional growth projections developed by the Southern California Association of Governments (SCAG). The proposed Renaissance Marketplace project is a commercial development and is not defined as a regionally significant project, which include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, waterports, solid waste disposal sites, and offshore drilling facilities; therefore, it does not meet the SCAG Intergovernmental Review (IGR) criteria.

The City's General Plan is consistent with the SCAG RCP Guidelines and the SCAQMD AQMP. Pursuant to the methodology provided in Chapter 12 of the 1993 SCAQMD CEQA Air Quality Handbook, consistency with the South Coast Air Basin 2012 AQMP is affirmed when a project (1) does not increase the frequency or severity of an air quality standards violation or cause a new violation, and (2) is consistent with the growth assumptions in the AQMP. Consistency review is presented below:

1. The Renaissance Specific Plan Amendment project would result in short-term construction and long-term pollutant emissions that are within the approved RSP projections and the proposed RSP as amended would not result in new significant air quality impacts; therefore, the retail component of the overall Specific Plan could not result in an increase in the frequency or severity of any air quality standards violation and will not cause a new air quality standard violation.

2. The *CEQA Air Quality Handbook* indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities; therefore, the proposed project is not defined as significant.

The land uses envisioned for the Renaissance Specific Plan Amendment project would not be more intense than could be developed under the General Plan. Based on the consistency analysis presented above, the proposed Renaissance Specific Plan Amendment project is consistent with the General Plan and the regional AQMP.

Source: Sections 4.2 and 5.3.2 of the Recirculated SEIR

C. Biological Resources

1. Potentially Significant Impacts Reduced to Less Than Significant Levels

Impact 4.3.1: The project would potentially impact Coastal California Gnatcatcher.

According to the 2015 Habitat Assessment, the project area is isolated from sage scrub habitats that occur north of the I-15 freeway. Ongoing development in north Rialto and Fontana has cut off connectivity and linkages of the project area to sage scrub plant communities in the San Gabriel Mountains that could provide foraging, dispersal, and nesting habitat for California gnatcatcher. The project area is not located within federally designated Critical Habitat for California gnatcatcher. However, the project area does contain 194.4 acres of buckwheat scrub which is a habitat that is used by the California Gnatcatcher. Potential impacts to California Gnatcatchers is considered a significant impact. The 2010 Renaissance EIR includes mitigation that requires focused California gnatcatcher surveys on portions of the project area. The surveys are required prior to construction to determine if California gnatcatchers are present onsite before construction activities below. Implementation of Mitigation Measure BIO-1 would reduce potential impacts to less than significant because the presence or absence of California gnatcatchers would be confirmed prior to construction activities.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the following mitigation measure as identified in the Final EIR and incorporated into the project.

Mitigation Measures

It should be noted that Mitigation Measure BIO-1 is from the 2010 Specific Plan EIR, but the text has been updated to reflect the proposed updates to the proposed Specific Plan Amendment numbering.

The following mitigation measure is required to reduce the proposed project's impacts to a less than significant level:

Mitigation Measure BIO-1: California Gnatcatcher

Prior to the issuance of grading permits, the project applicant shall submit to the satisfaction of the Development Services Director/Planning Division, evidence that focused surveys have been undertaken to determine the presence/absence of this species as indicated below. Surveys shall follow protocols established by the U.S. Fish and Wildlife Service (USFWS).

Portions of the project area have been determined to contain suitable habitat for California Gnatcatcher (CAGN) (Planning Areas 58, 104, 108, 110, 113, 114, 115, and 119, as appropriate). Prior to development of those planning areas, focused surveys must be undertaken to determine the presence/absence of this species. Surveys shall follow protocols established by the USFWS. In the event that CAGN is detected or observed within the disturbance footprint, avoidance, minimization, and mitigation measures shall be developed and implemented through consultation with the USFWS under Section 10 of the Federal Endangered Species Act (FESA) (or Section 7 as appropriate). At a minimum, mitigation measures will include the timing of construction activities outside of the breeding season (February 15 to August 31) and/or the purchase/conservation of offsite suitable habitat that is known to support CAGN at a minimum 1:1 ratio depending on the quality of habitat removed compared to the quality of habitat provided. Specific ratios will be determined in consultation with USFWS. Prior to the issuance of occupancy permits, the developer shall provide evidence of applicable species mitigation agreements/permits to the Development Services Director/Planning Division.

Impact 4.3.2: The project would potentially impact San Bernardino Kangaroo Rat.

The project site does not support the requisite Primary Constituent Elements (PCEs) needed to sustain a population of SBKR on the project site over the long-term, a residual population of SBKR could still occur on-site. Focused surveys for SBKR were conducted in 2005 within the northern portion of the project site and results were negative. The scattered KR sign observed during the 2015 site investigation occurs in the same area that was surveyed in 2005. The observed kangaroo rat sign is presumed to be Dulzura kangaroo

rat, a non-listed kangaroo rat species. SBKR has low potential for occurrence. To reduce potential impacts to SBKR, mitigation is required for the proposed project. With implementation of Mitigation Measure BIO-2 as identified below, potential impacts would be reduced to a less-than-significant level.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the following mitigation measure as identified in the Final EIR and incorporated into the project.

Mitigation Measures

The following mitigation measure is required to reduce the proposed project's impacts to a less than significant level:

Mitigation Measure BIO-2: San Bernardino Kangaroo Rat

Prior to the issuance of grading permits, the project applicant shall submit to the satisfaction of the Development Services Director/Planning Division, evidence that focused surveys have been completed by a qualified biologist to determine the presence/absence of San Bernardino Kangaroo Rat (SBKR) in areas of suitable habitat within the RSP Amendment Area. Surveys shall follow protocols established by the USFWS.

In the event that SBKR is detected or observed within the disturbance footprint, avoidance, minimization, and mitigation measures shall be developed and implemented through consultation with the USFWS under Section 10 of the FESA (or Section 7 if appropriate). At a minimum, mitigation measures will include the purchase/conservation of offsite suitable habitat that is known to support SBKR at a minimum 1:1 ratio depending on the quality of habitat removed compared to the quality of habitat provided. Specific ratios will be determined in consultation with USFWS. Prior to the issuance of occupancy permits, the developer shall provide copies of applicable species mitigation agreements or permits to the Development Services Director/Planning Division.

Impact 4.3.3: The project would potentially impact Burrowing Owl.

The RSPA area provides suitable nesting, foraging, and dispersing habitat for the western burrowing owl (Athene cunicularia) (BUOW). The development of the RSPA area as envisioned by the RSPA would

effectively remove all suitable habitat permanently. Therefore, the proposed project is expected to impact BUOW. Since BUOW has been observed breeding onsite and suitable habitat is present, BUOW is considered present onsite. Impacts to BUOW are considered potentially significant. With implementation of Mitigation Measure BIO-3 as identified below, potential impacts would be reduced to a less-than-significant level.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the following mitigation measure as identified in the Final EIR and incorporated into the project.

Mitigation Measures

The following mitigation measure is required to reduce the proposed project's impacts to a less than significant level:

Mitigation Measure BIO-3: Burrowing Owl

Prior to the issuance of grading permits and/or an action that would result in project site disturbance (whichever occurs first) (including but not limited to discing and demolition activities), the applicant shall submit to the satisfaction of the Development Services Director/Planning Division, evidence that focused clearance surveys have been completed to determine the presence/absence of burrowing owls (BUOW). Pre-construction surveys for BUOW shall be required in accordance with protocols established by California Department of Fish and Wildlife (CDFW) before the start of grading activities to confirm the absence of BUOW from the site. If the survey determine the BUOW to be present, protective measures shall be required to ensure compliance with the Migratory Bird Treaty Act and other applicable CDFW Code requirements and include, but are not limited to the following:

- Occupied BUOW shall not be disturbed during nesting season unless a qualified biologist verifies through non-invasive methods that either 1) the birds have not begun egg-laying or incubation or 2) that juveniles from the occupied burrows are foraging independently and are capable of an independent survival flight.

- All relocation shall be approved by the CDFW. The permitted biologist shall monitor relocated owls a minimum of three days per week for a minimum of three weeks. A report summarizing the results of the relocation and monitoring shall be submitted to the CDFW within 30 days following completion of the relocation and monitoring of the BUOW.

- A BUOW Long-term Management Plan (LTMP) shall be prepared by a qualified biologist and submitted to the CDFW for review and approval prior to relocation of owls. The BUOW LTMP shall describe proposed relocation, biological monitoring, and long-term management. The plan shall include the number and location(s) of occupied BOUW sites and details on suitable habitat at the receiver site selected and approved for relocation. The LTMP shall also describe specific procedures to compensate for impacts to BUOW/occupied burrows at the project area. Such procedures may include, but are not limited to, the purchase/conservation of offsite suitable habitat that is known to support BUOW at a minimum 1:1 ratio depending on the quality of habitat removed compared to the quality of habitat provided. Specific ratios will be determined in consultation with CDFW. Prior to the issuance of occupancy permits, the developer shall provide copies of applicable species mitigation agreements/permits to the Development Services Director/Planning Division.

Impact 4.3.4: The project would potentially impact sensitive plant species.

Based on habitat requirements for specific special-status plant species and the availability and quality of on-site habitats, it was determined that the project site has an overall low to moderate potential to support Plummer's mariposa-lily and Parry's spineflower. Mesa horkelia and Robinson's peppergrass are presumed absent from the project site due to lack of any recent observations on the project site and within the general vicinity of the project site as well as the absence of suitable habitat characteristics on-site. As such, potential impacts on mesa horkelia and Robsinson's pepper grass are considered less than significant and further focused plant surveys for mesa horkelia and Robsinson's pepper grass are required. However, some habitat potential exists for Plummer's mariposa-lily and Parry's spineflower exist within the project area.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the following mitigation measure as identified in the Final EIR and incorporated into the project.

Mitigation Measure

The following mitigation measure is required to reduce the proposed project's impacts to a less than significant level:

Mitigation Measure BIO-4: Focused Plant Surveys

Prior to the issuance of grading permits or and/or an action that would result in project site disturbance (whichever occurs first) (including but not limited to discing and demolition activities), the project applicant shall submit to the satisfaction of the Development Services Director/Planning Division, evidence from a qualified biologist that the project site does not contain suitable habitat for Plummer's mariposa-lily or Parry's spineflower. Should the project site be located within an area that does have potential for Plummer's mariposa-lily or Parry's spineflower, the applicant shall provide evidence that a focused plant survey for Plummer's mariposa-lily and Parry's spineflower has been conducted during the appropriate blooming season (generally May to July for Plummer's mariposa-lily and April to June for Parry's spineflower). If the survey results are negative for the presence of Plummer's mariposa-lily or Parry's spineflower, then no further action is required.

If the surveys are positive for the presence of Plummer's mariposa-lily or Parry's spineflower, then their distribution and associated natural plant community shall be documented and a formal report submitted to the California Department of Fish and Wildlife. These data will then be used to determine the level of impact to each identified species from project development. Impacts on sensitive plants shall be mitigated offsite at a minimum 2:1 ratio. Conservation credits for each of these species can be purchased at an approved conservation bank such as the Cajon Creek Conservation Bank.

Impact 4.3.5: The project would potentially impact sensitive plant habitat.

One sensitive plant community was observed on the project area during the habitat assessment: RAFSS. However, this plant community is heavily disturbed and has been effectively cut-off from fluvial processes. Without the restoration of the fluvial processes, the disturbed mature RAFSS habitat and rocky soils that now occupy the project area do not provide suitable habitat for sensitive biological resources. Nonetheless, the habitat is still considered to have some biological value, and development within the project area would result in the removal of approximately 63.4 acres of RAFSS habitat. Potential impacts to RAFSS are considered significant and mitigation is required. To reduce potential impacts to RAFSS, mitigation is required for the proposed project.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the following mitigation measure as identified in the Final EIR and incorporated into the project.

Mitigation Measure

The following mitigation measure is required to reduce the proposed project's impacts to a less than significant level:

Mitigation Measure BIO-5: Riversidian Alluvial Fan Sage Scrub

Prior to the issuance of grading permits, the project applicant shall submit to the satisfaction of the Development Services Director/Planning Division, evidence that preservation of RAFSS habitat with equal or better habitat value has been preserved at a suitable location where the long-term viability of the habitat can be assured. Satisfactory evidence includes, but is not limited to evidence that the appropriate amount (to be determined by the City of Rialto, the California Department of Fish and Wildlife [CDFW], and the project applicant) has been purchased at an approved mitigation bank, or that a long-term conservation plan that has been developed and implemented as part of longer-term mitigation strategy for multiple projects. Any long-term conservation plan must be presented to the City of Rialto and CDFW for review and comment as part of any needed incidental take permits.

Impact 4.3.6: The project would potentially impact migratory birds.

Due to the size of the RSPA area, the complexity of the habitat, and the secretive nesting grassland bird species that may be present (including the California horned lark and western meadowlark as determined by previous surveys conducted on the RSP area), the proposed project would potentially impact migratory birds.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the following mitigation measure as identified in the Final EIR and incorporated into the project.

Mitigation Measure

The following mitigation measure is required to reduce the proposed project's impacts to a less than significant level:

Mitigation Measure BIO-6: Migratory Birds

Prior to the issuance of grading permits and/or an action that would result in project site disturbance (whichever occurs first) (including but not limited to discing and demolition activities), the project applicant shall submit to the satisfaction of the Development Services Director/Planning Division, evidence that a pre-construction nesting bird survey has been conducted prior to any ground disturbing activities and removal of vegetation or other potential nesting habitat during the nesting period (generally February 1st to August 31st). If birds are found to be nesting inside or within 250 feet (500 feet for raptors) of the impact area, construction will need to be postponed, at the discretion of a qualified biologist, until it is determined that the nests are no longer active.

Impact 5.3.3: The project would potentially have cumulative impacts related to special status species, habitats, and potential effects relative to the interference migratory species or corridors.

The proposed Project was determined to have less than significant impacts on listed or sensitive wildlife, sensitive plants and habitat, or indirect impacts, with the exception of two federally endangered species, the California Gnatcatcher and San Bernardino Kangaroo Rat (SBKR), and one species of concern, the Burrowing Owl (BUOW), as well as nesting birds subject to protection under the Migratory Bird Treaty Act.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

Although, the RSP has the potential to impact the species listed above, project level impacts would be less than significant with the application of mitigation measures. These measures include the provision of replacement habitat in the event that the California Gnatcatcher, SBKR or BUOW are found on the project. Since mitigation reduces project impacts to levels that are less than significant, and since the replacement of occupied habitat is required if California Gnatcatcher, SBKR and BUOW are found on the Project area, cumulative impacts would be less than significant.

Mitigation Measures

Implementation of Mitigation Measures BIO-1, BIO-2 and BIO-3 would reduce potential impacts to less than significant.

Reference: Sections 4.3 and 5.3.3 of the Recirculated Draft SEIR.

D. Greenhouse Gas Emissions

1. Potentially Significant Impacts Reduced to Less Than Significant Levels

Impact 4.4.2: The project would potentially conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of greenhouse gases.

Threshold of Significance No. 1: Would the project interfere with the State of California's implementation of greenhouse gas emissions targets as expressed in AB 32, EO S-3-05 and EO B-30-15?

Threshold of Significance No. 2: Would the project interfere with implementation of California's Green Building Standards, the County's Climate Action Plan, or other applicable plans, policies or regulations adopted for purposes of reducing GHG emissions?

The Renaissance Marketplace would result in emissions of 25,000 MT CO2e/yr and would be higher than the SCAQMD Tier 3 threshold of 3,000 MT CO2e/yr for commercial or mixed-use projects. Planning Area 108 would result in emissions of 150,000 MT CO2e/yr, which would be higher than the SCAQMD threshold of 10,000 MT CO2e/yr for industrial projects. However, GHG emissions under both the approved RSP and the proposed RSPA would be higher than this threshold; neither the Renaissance Marketplace nor Planning Area 108 would result in new exceedance of the GHG threshold compared to the RSP. The Renaissance Marketplace and Planning Area 108, as part of the RSPA project, are therefore not inconsistent with all City GHG policies and goals.

The County has adopted the San Bernardino County Regional Greenhouse Gas Reduction Plan (March 2014) as a climate action plan (CAP). The County's CAP provides a framework for reducing GHG emissions and managing resources to best prepare for a changing climate. The CAP recommends GHG emissions targets that are consistent with the reduction targets of the State of California. The County CAP states the following (Introduction, page 1-2): Program EIR to Streamline CEQA Compliance: The State California Environmental Quality Act (CEQA) Guidelines require lead agencies to describe, calculate, or estimate the amount of GHG emissions that would result from a project. CEQA Guidelines (Section 15183.5) also allow individual projects to tier off of a larger (and certified) GHG reduction plan. Thus, individual projects do not need to each conduct a GHG analysis as part of CEQA if they can demonstrate consistency with the larger plan. By completing a common basic plan and a subsequent program EIR, all projects in the region can tier off the EIR and be considered less than significant under CEQA if they show consistency with the regional reduction plan.

The CAP is intended to reduce the County's impact on climate change. Within the CAP, the City of Rialto selected a goal to reduce its community GHG emissions to a level that is 15% below its 2008 GHG emissions level by 2020. The City will meet this goal through a combination of state (~69%) and local (~31%) efforts. The Pavley vehicle standards, the state's low carbon fuel standard, the RPS, and other state measures will reduce GHG emissions in Rialto's on-road, solid waste and building energy sectors in 2020. An additional reduction of 71,504 MTCO2e will be achieved primarily through the following local measures in order of importance: Implement SB X7-7 (Water-4); Solar Energy for Warehouse Space (Energy-6); and the GHG Performance Standard for New Development (PS-1). Rialto's reduction plan has the greatest impacts on GHG emissions in the solid waste management, building energy, and on-road transportation sectors. In order to ensure that the proposed Renaissance Marketplace and Planning Area 108 comply with and would not conflict with or impede the implementation of reduction goals identified in AB 32, the Governor's EO S-3-05, and other strategies to help reduce GHGs to the level proposed by the Governor, Mitigation Measure GHG-1 shall be implemented.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the following mitigation measure as identified in the Final EIR and incorporated into the project.

Mitigation Measures

The following mitigation measure is required to reduce the proposed project's impacts to a less than significant level:

Mitigation Measure GHG-1: GHG Reducing Measures

Prior to issuance of a building permit, the project applicant must submit to the satisfaction of the Director of Development Services Department, evidence that the proposed Renaissance Marketplace and Planning Area 108 projects comply with and would not conflict with or impede the implementation of reduction goals identified in Assembly Bill (AB) 32, the Governor's Executive Order (EO) S-3-05, and other strategies to help reduce greenhouse gases (GHGs) to the level proposed by the Governor, the Renaissance Marketplace and Planning Area 108 projects will be designed and constructed to incorporate and/or implement to the extent feasible and to the satisfaction of the City, the following measures:

Construction and Building Materials

- Use locally produced and/or manufactured building materials for at least 10 percent of the construction materials used for the projects.

- Recycle/reuse at least 50 percent of the demolished and/or grubbed construction materials (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard) if feasible.

- Use "Green Building Materials," such as those materials that are resource-efficient and are recycled and manufactured in an environmentally friendly way, for at least 10 percent of the projects.

Energy Efficiency Measures

- Design all project buildings to meet or exceed the California Building Code's (CBC) Title 24 energy standard, including, but not limited to, any combination of the following:

    - Increase insulation such that heat transfer and thermal bridging is minimized;

    - Limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption; and

    - Incorporate ENERGY STAR or better rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment.

- Install efficient lighting and lighting control systems. Use daylight as an integral part of the lighting systems in buildings.

- Install "cool" roofs and cool pavements.

- Install energy-efficient heating and cooling systems, appliances and equipment, and control systems.

- Install solar lights or light-emitting diodes (LEDs) for outdoor lighting or outdoor lighting that meets the City of Rialto City Code.

- Install solar photovoltaic or other technology to generate electricity on-site to reduce consumption from the electrical grid.

- Install electrical vehicle charging stations to promote the use of electrical vehicles.

- Promote and incentivize solar installations on new warehouse space through partnerships with SCE and other private sector funding sources including Sungevity, SolarCity, and other solar lease or PPA companies. Establish a goal that a percentage of new warehousing projects install solar to provide a minimum of 25 percent of the project's new on-site energy needs and that all existing warehousing install solar to provide a minimum of 25 percent of power needs with solar. This goal could be supported through nonfinancial incentives or streamlined permitting. Cities may also act as a resource for connecting project proponents with funding opportunities.

Water Conservation and Efficiency Measures

- Devise a comprehensive water conservation strategy appropriate for the project and its location. The strategy may include the following, plus other innovative measures that may be appropriate:
    - Create water-efficient landscapes within the development.
    - Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.
    - Use reclaimed water, if available, for landscape irrigation within the project. Install the infrastructure to deliver and use reclaimed water, if available.
    - Design buildings to be water-efficient. Install water-efficient fixtures and appliances, including low-flow faucets and waterless urinals.
    - Restrict watering methods (e.g., prohibit systems that apply water to nonvegetated surfaces) and control runoff.

Solid Waste Measures

- To facilitate and encourage recycling to reduce landfill-associated emissions, among others, the projects will provide trash enclosures that include additional enclosed area(s) for collection of recyclable materials. The recycling collection area(s) will be located within, near, or adjacent to each trash and rubbish disposal area. The recycling collection area will be a minimum of 50 percent of the area provided for the trash/rubbish enclosure(s) or as approved by the waste management department of the City of Rialto.
    - Provide employee education on waste reduction and available recycling services.

Transportation Measures

- To facilitate and encourage nonmotorized transportation, bicycle racks shall be provided in convenient locations to facilitate bicycle access to the project area. The bicycle racks shall be shown on project landscaping and improvement plans submitted for Planning Department approval and shall be installed in accordance with those plans.

- Provide pedestrian walkway and connectivity requirements

All new non-residential and multifamily developments of ten or more units shall be designed to incorporate the transportation control measures (TCM) described in Chapter 18.59 of the City of Rialto Municipal Code.

2. Significant and Unavoidable Impacts

Impact 4.4-1: The project would generate greenhouse gas emissions that may have a significant impact on the environment (Direct and Cumulative).

Greenhouse gas emissions for the approved RSP and the currently proposed RSPA (which includes the Renaissance Marketplace and Planning Area 108) were calculated and are shown below. As can be seen from Table 4.4-2, operational emissions for GHG would exceed the SCAQMD proposed Tier 4 thresholds of 6.6 MT CO_{2e} per Service Population (SP) where the SP would be 17,844. The proposed RSPA would increase the GHG emissions by 294,242 MT CO_2e/yr compared to that of the approved 2010 RSP. The primary reasons for the increase in greenhouse gas emissions between the 2010 RSP and the Specific Plan amendment area is a result of the increased amount of warehouse uses (and decrease in residential uses) within the specific plan area and the City's new methodology for the assumed volume of trucks. The increased amount of warehouse area results in a greater number of truck trips and longer trip lengths which increases the greenhouse gas emissions from transportation sources. The increased amount of warehouse use also results in increased amounts of greenhouse gas emissions from energy sources. The results for both the 2010 Renaissance Specific Plan EIR and the Specific Plan amendment are compared in Table 4.4-2. As was the case in the 2010 RSP EIR, the proposed project would exceed SCAQMD significance thresholds for greenhouse gas emissions and these impacts are considered significant and unavoidable.

Table 4.4-2 Long-Term Operational GHG Emissions – 2010 Approved RSP and Proposed RSPA

Source	Pollutant Emissions (MT/yr)					
	Bio-CO_2	NBio-CO_2	Total CO_2	CH_4	N_2O	CO_2e
2010 Approved RSP Non-Warehouse Land Uses						
Area Sources	0	428	428	0	<0.01	432
Energy Sources	0	14,920	14,920	1	0	14,984
Mobile Sources	0	66,299	66,299	3	0	66,351
Waste Sources	4,366	0	4,366	258	0	9,785
Water Usage	1,202	15,001	16,203	124	3	19,760
2010 Approved RSP Warehouse Land Uses						
Area Sources	0	0	0	<0.01	0	0

Energy Sources	0	18,203	18,203	1	0	18,281
Mobile Sources (Trucks)	0	174,332	174,332	1	0	174,357
Mobile Sources (Passenger Cars)	0	22,567	22,567	1	0	22,592
Waste Sources	1,151	0	1,151	68	0	2,580
Water Usage	443	5,199	5,642	46	1	6,950
2010 Approved RSP Total Emissions	**7,163**	**316,948**	**324,111**	**502**	**5**	**336,071**
SCAQMD Recommended Tier 4 Threshold for an 18,785 SP						**123,981**
Exceed SCAQMD Recommended GHG Emissions Threshold?						**Yes**
Proposed RSPA Non-Warehouse Land Uses						
Area Sources	0	324	324	0.03	<0.01	327
Energy Sources	0	13,487	13,487	0.56	0.15	13,544
Mobile Sources	0	66,284	66,284	2.5	0	66,338
Waste Sources	665	0	665	39	0	1,490
Water Usage	124	2,330	2,453	13	0.32	2,822
Proposed RSPA Warehouse Land Uses						
Area Sources	0	0.36	0.36	<0.01	0	0.39
Energy Sources	0	42,414	42,414	1.8	0.46	42,594
Mobile Sources (Trucks)	0	424,856	424,856	2.8	0	424,916
Mobile Sources (Passenger Cars)	0	54,996	54,996	3.0	0	55,059
Waste Sources	2,806	0	2,806	166	0	6,288
Water Usage	1,079	12,671	13,750	111	2.7	16,936
Proposed RSPA Total Emissions	**4,673**	**617,362**	**622,035**	**340**	**3.7**	**630,313**
SCAQMD Recommended Tier 4 Threshold for a 17,844 SP						**117,770**
Exceed SCAQMD Recommended GHG Emissions Threshold?						**Yes**
Net Change	**0**	**300,414**	**297,924**	**0**	**0.06**	**294,242**
New Significant Impacts?						**No**

Bio-CO_2 = biologically generated CO_2
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
GHG = greenhouse gas
MT/yr = metric tons per year
N_2O = nitrous oxide
NBio-CO_2 = non-biologically generated CO_2
RSP = Renaissance Specific Plan
RSPA = Renaissance Specific Plan Amendment
SCAQMD = South Coast Air Quality Management District
SP = service population

Source: Compiled by LSA Associates, Inc. (2016).

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which substantially lessen the environmental effect as identified in the Final EIR.

Pursuant to CEQA Guidelines Section 15091 (a)(3), there are no feasible alternatives to the project because of specific economic, legal, social, technological or other considerations, including the provision of employment opportunities for highly trained workers.

After implementation of Mitigation Measure GHG-1, there are no additional, feasible mitigation measures which can mitigate this impact to a level below significance. Pursuant to CEQA Guidelines Section 15093, therefore, the City has balanced the economic, legal, social, technological and other benefits of the project against its unavoidable environmental risks, and has determined that this impact is acceptable for the reasons stated in the Statement of Overriding Considerations.

Facts in Support of Findings

Reducing the project's greenhouse gas emissions to less than significant levels according to SCAQMD's thresholds would require the project to substantially reduce the amount of warehouse spaces and retail area. Such minimal use of an infill and redevelopment site located within such an extensive transportation network and existing warehouse market would be an inefficient and uneconomical use of the site and would not achieve basic objectives of the project. However, there are no feasible mitigations that lessen the impacts from the full development of the site to the impact level that would be achieved with developing a reduced project with minimal warehouse and commercial uses. Emissions from on-road mobile sources are regulated at the state and federal levels and, therefore, are outside of the jurisdiction and control of local agencies such as the City of Rialto and the SCAQMD, and local restriction on emissions from vehicles would be unenforceable. To the extent that project design features and mitigation measures can be implemented to reduce tailpipe emissions, including designing the project with a mix of land uses that allow individuals to live, work, and play within the project site, the project has minimized these impacts to the extent feasible.

Reference: Section 4.4 of the Recirculated Draft SEIR.

E. Hydrology and Water Quality

1. Potentially Significant Impacts Reduced to Less Than Significant Levels

Impact 4.5-3: The Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff

The Renaissance Marketplace project and the Planning Area 108 development includes several above ground drainage basins. The drainage facilities have been sized to adequately treat runoff water from the proposed project sites. Onsite storm drainage facilities serving future development projects shall be sized according to a required WQMP that will control and reduce polluted urban runoff from the project site. Furthermore, the proposed project includes a detention basin located in the northern portion of Planning Area 115. The detention basin will collect surface water from proposed development until adequate storm drain facilities have been constructed as the Specific Plan area is developed. Implementation of the following mitigation measures would reduce impacts related to stormwater runoff to less than significant.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the following mitigation measures as identified in the Final EIR and incorporated into the project.

Mitigation Measures

The following mitigation measure is required to reduce the proposed project's impacts to a less than significant level:

Mitigation Measure HYD-1 Flood Control/Drainage Channels: Prior to issuance of grading permits, the developers or their designees shall coordinate the design and obtain approval of all flood control and storm drain structures as identified in project hydrology studies. The developers or their designees shall provide evidence of this approval to the City Public Works Department. These improvements shall be consistent with any master planning efforts of the County to the satisfaction of the City Engineer.

Mitigation Measure HYD-2: The developers or their designees shall obtain a General Permit for Storm Water Discharge Associated with Construction Activity (Construction Activity General Permit). The developers or their designees shall provide a copy of this permit to the City Public Works Department prior to the issuance of grading permits.

Mitigation Measure HYD-3 Water Quality: Prior to the issuance of grading permits, the developers or their designees shall prepare a Water Quality Management Plan (WQMP) and an Erosion and Sediment Control Plan (ESCP) to implement the most appropriate BMPs and to prevent any significant removal and/or downstream deposition of soil from the project site during construction. The WQMP and ESCP shall contain provisions requiring that all erosion control measures and structures be maintained and repaired as needed for the life of the project.

Prior to the issuance of a grading permit, the City Development Services Department, Engineering Division shall approve the WQMP and ESCP based on review and input by the Regional Water Quality Control Board (RWQCB). At the request of the developer, the City Public Works Department may accept a Storm Water Pollution Prevention Plan (SWPPP) as a substitute for the ESCP as long as it fulfills the intent of this measure to an equivalent degree. The SWPPP or ESCP shall be prepared to the satisfaction of the City Public Works Department. The WQMP and ESCP or SWPPP shall include, but is not limited to, the following:

a) Specify the timing of grading and construction to minimize soil exposure to winter rain periods experienced in southern California;

b) Natural vegetation shall be retained on all areas that will not be disturbed for grading, except areas that must be cleared and revegetated as part of a fuel modification program;

c) All slopes greater than five feet in height shall be evaluated to define the optimum length and steepness to minimize flow velocity and erosion potential. Lateral drainage collection systems shall be incorporated at the base of slopes, when determined appropriate, to transport flows in a controlled, non-erodable channel;

d) Indicate where flows on the site can be diverted from denuded areas and carried in the natural channels on the site;

e) Construct man-made channels to minimize runoff velocities;

f) Disturbed areas shall be vegetated and mulched immediately after final grades have been established;

g) Sediment traps, basins, or barriers (silt fences, hay bales, etc.) shall be established on the property to prevent the release of "first flush" urban pollutants, including sediment, from developed areas, including the emergency access roads. The design and location of these improvements shall be identified in the plan subject to review and approval by the City;

h) Drainage facilities designed to transport flows shall be described and the adequacy of the channel shall be verified by City approval of a detailed drainage analysis;

i) An inspection and maintenance program shall be included to ensure that any erosion, which does occur either on or offsite as a result of the project, will be corrected through a remediation or restoration program within a time frame specified by the City;

j) Confirmed observations by the City of uncontrolled runoff being carried onsite will be grounds for suspension or revocation of any grading or building permit in process, or any discretionary permit subsequently applied for until the problem is resolved to the satisfaction of the City Public Works Department.

Mitigation Measure HYD-4 Prior to the issuance of building permits, graded but undeveloped land shall be maintained in a relatively weed-free condition and/or planted with interim landscaping within 180 days of completion of grading, unless building permits are obtained. This measure shall be implemented to the satisfaction of the Development Services Director.

Mitigation Measure HYD-5 Prior to the issuance of occupancy permits, planting of developed land shall comply with the NPDES Best Management Practices Construction Handbook Section 6.2 to the satisfaction of the City Engineer and/or Public Works Director as applicable.

Mitigation Measure HYD-6 Prior to issuance of the first occupancy permit, the developers or their designees shall provide proof to the Public Works Department that the onsite drainage facilities will be maintained by the County, City, HOA, or equivalent. The developer must demonstrate that these facilities will be adequately maintained by an appropriate mechanism or organization, to the satisfaction of the City Public Works Department.

Impact 5.3.5: The project would have potential cumulative yydrology and water quality impacts related to the potential for violation of water quality standards, groundwater supplies, and drainage patterns.

The potential for hydrology and water quality impacts is the areas immediately upstream and downstream of the RSP Amendment area. As development occurs, local surface and groundwater resources will be incrementally impacted as native soils are covered over, which will decease percolation and increase runoff and urban pollutants.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

These impacts will be reduced as long as local water agencies maintain their Urban Water Management Plans, which are now required by recent changes in State law. In addition, the cumulative projects, including the proposed project, will be required to prepare Stormwater Pollutant Prevention Plans (SWPPP), which will prevent construction-related pollutants from contaminating stormwater. Larger future development projects will be required to prepare Water Quality Management Plans (WQMP), based on the size and nature of the future project. The proposed project's Water Supply Assessment states that the local water providers have the ability and supply to meet projected water demands, including the proposed projects, in the year 2025. Buildout of the City of Rialto has been evaluated in the Urban Water Management Plans, so future development is included within the projected water demand for these agencies, and thus potential impacts will be less than significant. Some of the proposed projects will be required to produce WSA based on their nature and size. Some of the cumulative projects as proposed will be built within the Federal Emergency Management Agency (FEMA) 100-year flood plains; however, to of Rialto's Development Code. For the preceding reasons, cumulative impacts will not be considerable.

Mitigation Measures

Implementation of Mitigation Measures HYD-1, HYD-2, HYD-3, HYD-4, HYD-5, and HYD-6 would reduce potential impacts to less than significant.

Reference: Sections 4.5 and 5.3.5 of the Recirculated Draft SEIR.

F. Noise

1. Potentially Significant Impacts Reduced to Less Than Significant Levels

Impact 4.6.1: The project would expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Construction Impacts

There are no existing residences or other noise-sensitive uses in the immediate vicinity of the Renaissance Marketplace site. However, if the proposed multifamily residences to the south of the Renaissance Marketplace site are constructed and occupied prior to the start of construction for the proposed Renaissance Marketplace, then these closest "existing" residences would be located approximately 100 feet from the construction area of Renaissance Marketplace. With the noise attenuation effect from the distance divergence, construction noise would be attenuated by 6 dBA compared to the noise level measured at 50 feet. Therefore, if constructed and occupied, these closest residences may be subject to short-term noise reaching 84 dBA Lmax that would be generated by construction activities near the southern boundary of the Renaissance Marketplace site. Compliance with the restrictions on construction hours permitted by the City (Section 9.50.070(b) of the City of Rialto Municipal Code) would be sufficient to reduce the construction noise to a less than significant level. Therefore, no significant construction noise impacts would occur if construction of the proposed Renaissance Marketplace occurs within the permitted hours.

There are no existing residences or other noise-sensitive uses in the immediate vicinity of the Planning Area 108 site. However, if the proposed residences to the east of the Planning Area 108 are constructed and occupied prior to the start of construction for the proposed Planning Area 108, then these closest "existing" residences would be located approximately 100 feet from the construction activity of Planning Area 108. With the noise attenuation effect from the distance divergence, construction noise would be attenuated by 6 dBA compared to the noise level measured at 50 feet. Therefore, if constructed and occupied, these closest residences may be subject to short-term noise reaching 84 dBA Lmax that would be generated by construction activities near the eastern boundary of Planning Area 108. Compliance with the restrictions on construction hours permitted by the City would be sufficient to reduce the construction noise to a less than significant level. Therefore, no significant construction noise impacts would occur if construction of the proposed Planning Area 108 occurs within the permitted hours.

Long-Term On-Site Stationary Source Impacts

The proposed Renaissance Marketplace commercial/retail uses would generate noise from truck delivery, loading/unloading activities, and other activities at the parking lot. These activities are potential point sources of noise that could affect noise-sensitive receptors adjacent to the loading areas, such as

multifamily residential uses to the south of the Renaissance Marketplace project site (after they are constructed and occupied).

The proposed Planning Area 108 industrial/warehouse uses would generate noise from truck delivery, loading/unloading activities and other activities in the parking lot. These activities are potential point sources of noise that could affect noise-sensitive receptors adjacent to the loading areas, such as residential uses to the east of the Planning Area 108 project site (after they are constructed and occupied).

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the following mitigation measure as identified in the Final EIR and incorporated into the project.

Mitigation Measures

The following mitigation measure is required to reduce the proposed project's impacts to a less than significant level:

Construction Impacts. Construction of the proposed project would not result in noise levels exceeding the maximum noise level allowed at the closest residences. However, the following measures would further reduce short-term, construction-related noise impacts associated with the proposed project:

Mitigation Measure NOI-1: Prior to the issuance of any grading plan or improvement plan, the applicant shall demonstrate to the satisfaction of the Public Works Director that the following notes are shown on the grading plans:

3. During all project site excavation and grading on site, the project contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards.

4. The project contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors to the southwest of the site.

5. During all project site construction, the construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receptors to the southwest of the site.

6. During all project site construction, the construction contractor shall limit all construction-related activities that would result in high noise levels to the hours shown in Section 9.50.070(b) of the City of Rialto Municipal Code. No construction shall be allowed on Sundays and public holidays.

On-Site Operational Impacts. The following mitigation measures are required for on-site operations.

Mitigation Measure NOI-2: Prior to the issuance of any grading permits within Planning Area 104 (Renaissance Marketplace) or Planning Area 108, the applicant shall demonstrate that the following noise barriers are shown on the building plans or have been constructed in locations where nighttime loading activity is proposed:

1. A stand-alone noise barrier with a minimum height of 8 feet is required along the southern boundary of the Renaissance Marketplace if nighttime loading/unloading activity is expected at the loading areas of these proposed Renaissance Marketplace commercial/retail uses.

2. A stand-alone noise barrier with a minimum height of 8 feet is required along the eastern boundary of Planning Area 108 between the driveways if nighttime loading/unloading activity is expected at the loading areas of these proposed industrial/warehouse uses.

The following mitigation measures apply to all development within the Specific Plan Amendment Area.

Mitigation Measure NOI-3: Prior to the issuance of any grading or improvements plans, the applicant shall demonstrate that the following mitigation measures have been incorporated into the project design or that the mitigation does not apply to the current development:

Mitigation Measure N-1: Construction activities shall be limited to the City's allowable hours of construction activities shown in Table 4.11-2 (repeated in Table E in this noise study) in accordance with the City's Noise Ordinance.

Mitigation Measure N-2: All construction equipment shall use noise-reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.

Mitigation Measure N-3: Construction staging and heavy equipment maintenance activities shall be performed a minimum distance of 300 feet from any nearby noise sensitive uses, unless safety or technical factors take precedence.

Mitigation Measure N-4: Stationary combustion equipment such as pumps or generators operating within 300 feet of any nearby noise sensitive uses shall be shielded with a noise protection barrier.

Mitigation Measure N-5: The City shall require that a noise impact analysis be prepared for all proposed residential subdivisions within the Specific Plan and for any commercial or business developments located adjacent to existing or proposed noise sensitive land uses. Each noise impact analysis shall identify potential construction noise impacts and provide mitigation, if necessary to reduce the construction noise impacts to within the City noise level standards of the Noise Element of the Rialto General Plan.

Mitigation Measure N-6: The City shall require that a noise impact analysis be prepared for all proposed residential subdivisions within the Specific Plan, and proposed commercial retail or business uses located adjacent to Alder Avenue, Baseline Road, SR-210, or adjacent to other sensitive on-site or off-site uses. Each noise impact analysis shall identify potential direct, project-related, transportation noise impacts and provide mitigation, if necessary, to reduce the traffic noise impacts as well as other onsite stationary noise impacts to within the City noise level standards of the Land Use Element of the Rialto General Plan (shown in Table 4.11-1 in the DEIR and repeated in Table 4.6-2 in this Draft SEIR).

Mitigation Measure N-7: The City shall require that a vibration impact analysis be prepared for all proposed residential subdivisions within the Specific Plan and for any commercial or business developments located adjacent to existing or proposed vibration sensitive land uses. Each vibration impact analysis shall identify potential construction-related vibration impacts and provide mitigation, if necessary, to reduce the construction to within the County vibration level standards.

Mitigation Measure N-8: The City shall require that a vibration impact analysis be prepared for any commercial or business developments located adjacent to existing or proposed vibration sensitive land uses. Each vibration analysis shall identify potential sources of vibration impacts and provide mitigation, if necessary, to reduce the vibration impacts to within the County standards.

Impact 4.6-3: The project would have a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

Along these roadway segments, there are no existing noise-sensitive uses that would be impacted by these potentially significant traffic noise level increases. Along most roadway segments west of Linden Avenue, land uses would be commercial, industrial, or institutional. These land uses are not considered noise sensitive. Only the proposed residential uses, public park, and school within the RSPA that are located east of Linden Avenue are considered noise sensitive, and potential traffic noise impacts on these proposed on-site noise-sensitive uses would be evaluated under the future worst-case conditions under the cumulative with both Renaissance Marketplace and Planning Area 108 conditions included. Implementation of mitigation measure NOI-4 would reduce impacts related to permanent increases to ambient noise levels to a less than significant level.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the following mitigation measure as identified in the Final EIR and incorporated into the project.

Mitigation Measures

The following mitigation measure is required to reduce the proposed project's impacts to a less than significant level:

Mitigation Measure NOI-4: Upon approval of a tentative map in the following Planning Areas, the applicant shall demonstrate that required sound barriers have been constructed.

1. For the school (Sub-Area 123) and public park (Sub-Area 126) along Ayala Drive with outdoor active use areas within 184 feet of the Ayala Drive centerline, prior to the occupancy of these residential units, sound walls with a minimum height of 6 feet are recommended along the project boundary along Ayala Drive or along the perimeter of the active use areas that are directly exposed to traffic on Ayala Drive.

2. For residential uses proposed in Sub-Area 115 with outdoor living areas (e.g., patios and balconies/decks) or recreational areas (e.g., barbecue area or children's playground) within 184 feet of the Ayala Drive centerline, prior to the occupancy of these residential units, a sound wall with a minimum height of 6 feet should be constructed along the project boundary along Ayala Drive or along the perimeter of the outdoor living/recreational areas that are directly exposed to traffic on Ayala Drive. Higher walls may be necessary if these outdoor living/recreational areas are proposed within 86 feet (70 dBA CNEL) of the centerline of Ayala Drive.

3. For the public park (Sub-Area 126) along Linden Avenue with outdoor active use areas proposed within 86 feet of the Linden Avenue centerline, prior to the occupancy of these residential units, sound walls with a minimum height of 6 feet are recommended along the project boundary along Linden Avenue or along the perimeter of the active use areas that are directly exposed to traffic on Linden Avenue.

4. For residential uses proposed in Sub-Areas 110, 116, and 113 with outdoor living areas (e.g., backyards/patios and balconies/decks) or recreational areas (e.g., barbecue area or children's playground) within 95 feet of the Linden Avenue centerline, prior to the occupancy of the residential units, outdoor living/recreational areas should be protected with a sound wall with a minimum height of 6 feet.

Impact 5.3.6: The project would have cumulative noise impacts related to exposing people to generation of noise levels and/or groundborne vibrations levels above applicable standards, and increasing temporary or permanent noise levels above applicable standards.

Cumulative traffic increase and resulting noise can be attributed to these projects plus ambient traffic near the project area. Project cumulative noise levels are shown in **Table 5-4**.

Table 5-4: Cumulative Year (2035) Traffic Noise Levels With and Without RSPA

	Cumulative Year (2035) Without RSPA (Baseline)					Cumulative Year (2035) With RSPA (including Renaissance Marketplace and Planning Area 108)						
Roadway Segment	**ADT**	**Centerline to 70 dBA CNEL (ft)**	**Centerline to 65 dBA CNEL (ft)**	**Centerline to 60 dBA CNEL (ft)**	**CNEL (dBA) 50 ft from Centerline of Outermost Lane**	**ADT**	**Change in ADT**	**Centerline to 70 dBA CNEL (ft)**	**Centerline to 65 dBA CNEL (ft)**	**Centerline to 60 dBA CNEL (ft)**	**CNEL (dBA) 50 ft from Centerline of Outermost Lane**	**Increase over Baseline CNEL (dBA) 50 ft from Centerline of Outermost Lane**
Casmalia Street between Alder Avenue and Locust Avenue	12,600	< 50	87	187	67.9	19,500	6,900	54	116	250	69.8	1.9
Casmalia Street between Locust Avenue and Linden Avenue	4,600	< 50	< 50	96	63.5	11,500	6,900	< 50	82	176	67.5	4.0
Casmalia Street between Linden Avenue and Ayala Drive	4,800	< 50	< 50	98	63.7	11,000	6,200	< 50	79	171	67.3	3.6
Renaissance Parkway west of Alder Avenue	5,300	< 50	70	148	65.3	21,300	16,000	82	173	371	71.3	6.0
Renaissance Parkway between Alder Avenue and Locust Avenue	7,100	< 50	85	179	66.5	21,700	14,600	83	175	376	71.4	4.9
Renaissance Parkway between Locust Avenue and Linden Avenue	5,200	< 50	70	146	65.2	19,100	13,900	77	161	346	70.8	5.6
Renaissance Parkway between Linden Avenue and Ayala Drive	6,700	< 50	82	173	66.3	22,300	15,600	84	179	383	71.5	5.2
Renaissance Parkway east of Ayala Drive	7,000	< 50	84	178	66.5	13,800	6,800	63	130	278	69.4	2.9

	Cumulative Year (2035) Without RSPA (Baseline)					Cumulative Year (2035) With RSPA (including Renaissance Marketplace and Planning Area 108)						
Roadway Segment	**ADT**	**Centerline to 70 dBA CNEL (ft)**	**Centerline to 65 dBA CNEL (ft)**	**Centerline to 60 dBA CNEL (ft)**	**CNEL (dBA) 50 ft from Centerline of Outermost Lane**	**ADT**	**Change in ADT**	**Centerline to 70 dBA CNEL (ft)**	**Centerline to 65 dBA CNEL (ft)**	**Centerline to 60 dBA CNEL (ft)**	**CNEL (dBA) 50 ft from Centerline of Outermost Lane**	**Increase over Baseline CNEL (dBA) 50 ft from Centerline of Outermost Lane**
Baseline Road west of Alder Avenue	18,200	74	156	335	70.6	31,400	13,200	105	224	481	73.0	2.4
Baseline Road between Alder Avenue and Locust Avenue	20,500	80	169	362	71.1	33,600	13,100	110	234	503	73.3	2.2
Baseline Road between Locust Avenue and Linden Avenue	17,100	71	150	321	70.3	30,700	13,600	104	221	474	72.9	2.6
Baseline Road between Linden Avenue and Ayala Drive	20,200	79	167	359	71.1	34,900	14,700	113	240	516	73.4	2.3
Baseline Road east of Ayala Drive	15,500	67	141	301	69.9	23,800	8,300	88	186	400	71.8	1.9
Alder Avenue south of Casmalia Street	18,600	75	158	339	70.7	32,600	14,000	108	229	493	73.1	2.4
Alder Avenue between SR-210 Ramps	18,200	74	156	335	70.6	41,500	23,300	126	269	579	74.2	3.6
Alder Avenue north of Renaissance Parkway	20,800	81	171	366	71.2	49,900	29,100	142	304	655	75.0	3.8
Alder Avenue between Renaissance Parkway and Walnut Avenue	17,400	< 50	108	232	69.3	35,600	18,200	81	173	373	72.4	3.1

	Cumulative Year (2035) Without RSPA (Baseline)					Cumulative Year (2035) With RSPA (including Renaissance Marketplace and Planning Area 108)						
Roadway Segment	**ADT**	**Centerline to 70 dBA CNEL (ft)**	**Centerline to 65 dBA CNEL (ft)**	**Centerline to 60 dBA CNEL (ft)**	**CNEL (dBA) 50 ft from Centerline of Outermost Lane**	**ADT**	**Change in ADT**	**Centerline to 70 dBA CNEL (ft)**	**Centerline to 65 dBA CNEL (ft)**	**Centerline to 60 dBA CNEL (ft)**	**CNEL (dBA) 50 ft from Centerline of Outermost Lane**	**Increase over Baseline CNEL (dBA) 50 ft from Centerline of Outermost Lane**
Alder Avenue between Walnut Avenue and Baseline Road	15,500	< 50	100	215	68.8	27,400	11,900	68	146	314	71.3	2.5
Laurel Avenue south of Renaissance Parkway	1,500	< 50	< 50	< 50	58.6	3,800	2,300	< 50	< 50	84	62.7	4.1
Locust Avenue south of Casmalia Street	4,800	< 50	66	139	64.8	20,900	16,100	81	171	367	71.2	6.4
Linden Avenue north of Renaissance Parkway	3,100	< 50	< 50	104	62.9	12,700	9,600	59	123	263	69.0	6.1
Ayala Drive south of Casmalia Street	18,100	74	156	333	70.6	27,400	9,300	96	205	439	72.4	1.8
Ayala Drive between SR 210-Ramps	20,800	81	171	366	71.2	34,900	14,100	113	240	516	73.4	2.2
Ayala Drive north of Renaissance Parkway	26,500	94	200	430	72.2	44,700	18,200	132	283	608	74.5	2.3
Ayala Drive between Renaissance Parkway and Leiske Drive	25,200	64	138	296	70.9	38,900	13,700	86	184	396	72.8	1.9
Ayala Drive between Baseline Road and Fitzgerald Avenue	20,100	55	119	255	69.9	31,400	11,300	74	159	343	71.9	2.0

Roadway Segment	Cumulative Year (2035) Without RSPA (Baseline)					Cumulative Year (2035) With RSPA (including Renaissance Marketplace and Planning Area 108)						
	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	ADT	Change in ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	Increase over Baseline CNEL (dBA) 50 ft from Centerline of Outermost Lane
Locust Avenue between Renaissance Parkway and Miro Way	4,100	< 50	< 50	89	63.0	18,800	14,700	53	113	244	69.6	6.6
Locust Avenue between Miro Way and Baseline Road	1,400	< 50	< 50	< 50	58.3	14,200	12,800	< 50	94	202	68.4	10.1
Linden Avenue between Renaissance Parkway and Miro Way	3,800	< 50	< 50	84	62.7	14,500	10,700	< 50	95	205	68.5	5.8
Linden Avenue between Miro Way and Baseline Road	2,400	< 50	< 50	62	60.7	12,500	10,100	< 50	86	186	67.9	7.2
Miro Way between Locust Avenue and Linden Avenue	900	< 50	< 50	< 50	56.4	3,600	2,700	< 50	< 50	81	62.4	6.0

Note: Traffic noise within 50 ft of the roadway centerline should be evaluated with site-specific information.
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibels
ft = feet

Source: Compiled by LSA Associates, Inc. (2015).

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

Potentially significant cumulative environmental effects have been eliminated or substantially lessened to a level that is less than significant by virtue of the following mitigation measure as identified in the Final EIR and incorporated into the project.

Mitigation Measures

Implementation of Mitigation Measures NOI-1, NOI-2, NOI-3, and NOI-4 would reduce potential impacts to less than significant.

Reference: Sections 4.4 and 5.3.6 of the Recirculated Draft SEIR.

G. Transportation/Traffic

1. Potentially Significant Impacts Reduced to Less Than Significant Levels

Renaissance Specific Plan Amendment

This section of the traffic analysis identifies the impacts associated with the proposed RSPA under the following scenarios:

- Existing with Renaissance Specific Plan Amendment Conditions
- Year 2035 with Renaissance Specific Plan Amendment Conditions

Impact 4.7-1: Project impacts under "Existing with Renaissance Specific Plan Amendment" conditions, would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, and exceed the level of service standard.

Under the "Existing with Renaissance Specific Plan Amendment" condition, 20 intersections would operate at unsatisfactory levels of service. Based on the City's significant impact criteria, the RSPA would have a significant impact at all 20 of these intersections. At those intersections operating at an unsatisfactory LOS, the addition of project traffic increases the intersection delay by more than 2.0 seconds when operating at LOS E and by more than 1.0 second when operating at LOS F. In addition, the

RSPA would have a significant impact at the intersection of Locust Avenue/Baseline Road, which would experience a satisfactory LOS D, but the addition of project traffic would increase the intersection delay by more than 5.0 seconds.

Under the "Existing with Renaissance Specific Plan Amendment" condition, 13 study area roadway segments would operate at an unsatisfactory LOS. The City does not have significant project impact criteria for roadway segments; however, improvements are recommended when a roadway segment operates at an unsatisfactory level of service. Implementation of mitigation measures TRANS-1, TRANS-2, and TRANS-3 would reduce the impacts related to transportation/traffic to a less than significant level.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the mitigation measures TRANS-1, TRANS-2, and TRANS-3 (shown below) as identified in the Final EIR and incorporated into the project.

Impact 4.7-3: Project impacts under Year 2035 with Renaissance Specific Plan Amendment conditions, the RSPA would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, and exceed the level of service standard.

Under the "Year 2035 with Renaissance Specific Plan Amendment" condition, 26 intersections would operate at unsatisfactory levels of service. Based on the City's significant impact criteria, the RSPA would have a significant impact at all 26 of these intersections. At these locations, the addition of RSPA traffic would increase the intersection delay by more than 2.0 seconds when operating at LOS E and by more than 1.0 second when operating at LOS F.

Under "Year 2035 with Renaissance Specific Plan Amendment" conditions, 22 study area roadway segments would operate at unsatisfactory levels of service. The City does not have significant project impact criteria for roadway segments; however, improvements are recommended when a roadway segment operates at an unsatisfactory level of service. Implementation of mitigation measures TRANS-1, TRANS-2, and TRANS-3 would reduce the impacts related to transportation/traffic to a less than significant level.

Renaissance Marketplace

Potential impacts associated with the proposed Renaissance Marketplace were assessed under the following scenarios:

- Existing with Renaissance Marketplace Conditions
- Operational Year with Renaissance Marketplace Conditions
- Cumulative with Renaissance Marketplace Conditions

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the mitigation measures TRANS-1, TRANS-2, and TRANS-3 (shown below) as identified in the Final EIR and incorporated into the project.

Impact 4.7-4: Under Existing with Renaissance Marketplace conditions, the Renaissance Marketplace would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, and exceed the level of service standard.

Six study area intersections are forecast to operate at unsatisfactory levels of service. Based on the City's significant impact criteria, the Renaissance Marketplace would have a significant impact at these six study intersections. At these intersections operating at an unsatisfactory level of service, the addition of the Marketplace traffic increases intersection delay by more than 2.0 seconds when operating at LOS E and by more than 1.0 second when operating at LOS F.

In addition, the Renaissance Marketplace would also have a significant impact at the intersection of Ayala Drive/Renaissance Parkway-Easton Street. Although this intersection operates at satisfactory LOS D, the addition of the Renaissance Marketplace traffic would increase the intersection delay by more than 5.0 seconds; therefore, a significant impact would occur. Implementation of mitigation measures TRANS-1, TRANS-2, and TRANS-3 would reduce the impacts related to transportation/traffic to a less than significant level.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the mitigation measures TRANS-1, TRANS-2, and TRANS-3 (shown below) as identified in the Final EIR and incorporated into the project.

Impact 4.7-6: Under Operational Year with Renaissance Marketplace conditions, the Renaissance Marketplace would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, and exceed the level of service standard.

Seven study area intersections are forecast to operate at unsatisfactory levels of service under "Operational Year with Renaissance Marketplace" conditions. Based on the City's significant impact criteria, the Renaissance Marketplace would have a significant impact at the six of the seven study intersections operating at unsatisfactory conditions. At these intersections operating at an unsatisfactory level of service, the addition of the Renaissance Marketplace traffic would increase intersection delay by more than 2.0 seconds when operating at LOS E and by more than 1.0 second when operating at LOS F. The Renaissance Marketplace would not have a significant impact at the intersection of Locust Avenue/Casmalia Street because project traffic would not increase the intersection delay by 5.0 seconds when operating at LOS E.

In addition, the Renaissance Marketplace would also have a significant impact at the intersection of Ayala Drive/Renaissance Parkway-Easton Street. Although this intersection would operate at satisfactory LOS D, the addition of the Renaissance Marketplace traffic would increase the intersection delay by more than 5.0 seconds; therefore, a significant impact would occur. Implementation of mitigation measures TRANS-1, TRANS-2, and TRANS-3 would reduce the impacts related to transportation/traffic to a less than significant level.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the mitigation measures TRANS-1, TRANS-2, and TRANS-3 (shown below) as identified in the Final EIR and incorporated into the project.

Impact 4.7-7: Under Cumulative with Renaissance Marketplace conditions, the Renaissance Marketplace would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, and exceed the level of service standard.

Under "Cumulative with Renaissance Marketplace" conditions, 15 study area intersections are forecast to operate at unsatisfactory levels of service. Based on the City's significant impact criteria, the Renaissance Marketplace would have a significant impact at the 14 of the 15 study intersections operating at unsatisfactory conditions. At these intersections operating at an unsatisfactory level of service, the addition of the Renaissance Marketplace traffic would increase intersection delay by more than 2.0 seconds when operating at LOS E and by more than 1.0 second when operating at LOS F. The Renaissance Marketplace would not have a significant impact at the intersection of Ayala Drive/Leiske Drive because project traffic would not increase the intersection delay by 2.0 seconds when operating at LOS E.

In addition, the Renaissance Marketplace would also have a significant impact at the following four intersections operating at a satisfactory level of service because the addition of the Renaissance Marketplace traffic would increase the intersection delay by more than 5.0 seconds: Alder Avenue/Easton Street-Renaissance Parkway; Linden Avenue/Renaissance Parkway; Ayala Drive/Casmalia Street; and Ayala Drive/Renaissance Parkway-Easton Street. Implementation of mitigation measures TRANS-1, TRANS-2, and TRANS-3 would reduce the impacts related to transportation/traffic to a less than significant level.

Planning Area 108

This section of the report identifies the impacts associated with the proposed Planning Area 108 under the following scenarios:

- Existing with Planning Area 108 Conditions
- Operational Year with Planning Area 108 Conditions
- Cumulative with Planning Area 108 Conditions

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the mitigation measures TRANS-1, TRANS-2, and TRANS-3 (shown below) as identified in the Final EIR and incorporated into the project.

Impact 4.7-8: Under Existing with Planning Area 108 conditions, Planning Area 108 would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, and exceed the level of service standard.

Under "Existing with Planning Area 108" conditions, four study area intersections are forecast to operate at unsatisfactory levels of service. Based on the City's significant impact criteria, Planning Area 108 would have a significant impact at all four intersections. At these intersections operating at an unsatisfactory level of service, the addition of Planning Area 108 traffic would increase intersection delay by more than 2.0 seconds when operating at LOS E and by more than 1.0 second when operating at LOS F.

In addition, Planning Area 108 would have a significant impact at the intersections of Laurel Avenue/Casmalia Street, Linden Avenue/Miro Way; and Ayala Drive/Baseline Road. Although these intersections operate at satisfactory LOS D, the addition of Planning Area 108 traffic would increase delay by more than 5.0 seconds; therefore, a significant impact would occur. Implementation of mitigation measures TRANS-1, TRANS-2, and TRANS-3 would reduce the impacts related to transportation/traffic to a less than significant level.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the mitigation measures TRANS-1, TRANS-2, and TRANS-3 (shown below) as identified in the Final EIR and incorporated into the project.

Impact 4.7-10: Under Operational Year with Planning Area 108, conditions Planning Area 108 would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, and exceed the level of service standard.

Under "Operational year with Planning Area 108" conditions, five study area intersections are forecast to operate at unsatisfactory levels of service. Based on the City's significant impact criteria, Planning Area 108 would have a significant impact at four of the five study intersections operating at unsatisfactory conditions. At these intersections operating at an unsatisfactory level of service, the addition of Planning Area 108 traffic would increase intersection delay by more than 2.0 seconds when operating at LOS E and by more than 1.0 second when operating at LOS F. Planning Area 108 would not have a significant impact at the intersection of Locust Avenue/Casmalia Street because project traffic would not increase the intersection delay by 2.0 seconds when operating at LOS E.

In addition, Planning Area 108 would also have a significant impact at the intersections of Laurel Avenue/Casmalia Street, Linden Avenue/Miro Way, and Ayala Drive/Baseline Road. Although these intersections would operate at satisfactory LOS D, the addition of Planning Area 108 traffic would increase the intersection delay by more than 5.0 seconds; therefore, a significant impact would occur. Implementation of mitigation measures TRANS-1, TRANS-2, and TRANS-3 would reduce the impacts related to transportation/traffic to a less than significant level.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the mitigation measures TRANS-1, TRANS-2, and TRANS-3 (shown below) as identified in the Final EIR and incorporated into the project.

Impact 4.7-11: Under Cumulative with Planning Area 108 conditions, Planning Area 108 would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, and exceed the level of service standard.

Under "Cumulative with Planning Area 108" conditions, 16 study area intersections are forecast to operate at unsatisfactory levels of service. Based on the City's significant impact criteria, Planning Area 108 would have a significant impact at all 16 study intersections operating at unsatisfactory conditions.

At these intersections operating at an unsatisfactory level of service, the addition of Planning Area 108 traffic would increase intersection delay by more than 2.0 seconds when operating at LOS E and by more than 1.0 second when operating at LOS F.

In addition, Planning Area 108 would have a significant impact at the following two intersections operating at a satisfactory level of service because the addition of Planning Area 108 traffic would increase the intersection delays by more than 5.0 seconds: Avenue/Renaissance Parkway; and Ayala Drive/Renaissance Parkway-Easton Street. Implementation of mitigation measures TRANS-1, TRANS-2, and TRANS-3 would reduce the impacts related to transportation/traffic to a less than significant level.

Impact 5.3.7: The project would have potential cumulative impacts on roadway and intersection capacity and level of service (LOS).

Based on the Project's traffic impact analysis of the RSPA, the Renaissance Marketplace project, and the Planning Area 108 project, the proposed Project would result in significant impacts to study intersections level of service. As growth occurs, there will be cumulatively considerable traffic impacts and congestion on SR-210.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

Prior to the issuance of building permits, the developer of the proposed project will be required to construct various improvements to these roadways in order to mitigate cumulative considerable impacts. Additionally, the related projects and other conduits of ambient growth will be required to abide by all applicable traffic regulations and potentially the regulations of the San Bernardino County CMP.

Mitigation Measures

The following mitigation measures are required to reduce the proposed project's impacts to a less than significant level:

Mitigation Measure TRANS-1: The City shall ensure that Renaissance Specific Plan Amendment generated traffic will not result in inadequate LOS for Renaissance Specific Plan Amendment project intersections. Based on the Renaissance Specific Plan Amendment traffic study prepared by LSA (2015), the City Traffic Engineer shall review individual site-specific development proposals to evaluate whether such proposals would cause LOS failure at project intersections prior to the issuance of grading permits. If it is determined

that traffic generated from such proposal would cause LOS failure, the project proponent shall provide, either through construction of and/or monetary contribution for, improvements listed in Table 4.7-20, Table 4.7-21, and Table 4.7-22 of the Draft Environmental Impact Report. Such improvements and/or monetary contribution shall be provided in proportion to an individual project's impacts on traffic and to the satisfaction of the City Traffic Engineer.

Mitigation Measure TRANS-2: The Renaissance Marketplace project applicant shall enter into a Development Agreement (DA) with the City of Rialto. This DA shall describe the timing and implementation of project-specific improvements, as well as existing funding mechanisms and proportional fair-share contributions, for the improvements listed in Table 4.7-23, Table 4.7-24, Table 4.7-25, and Table 4.7-26 of the Draft Environmental Impact Report. Where no existing funding mechanism exists for recommended improvements, the DA shall stipulate that the project applicant shall pay not less than the fair share contribution to mitigate project impacts.

Mitigation Measure TRANS-3: The Planning Area 108 (PA 108) project applicant shall enter into a Development Agreement (DA) with the City of Rialto. This DA shall describe the timing and implementation of project-specific improvements, as well as existing funding mechanisms and proportional fair-share contributions, for the improvements listed in Table 4.7.27, Table 4.7-28, Table 4.7-29, and Table 4.7-30 of the Draft Environmental Impact Report. Where no existing funding mechanism exists for recommended improvements, the DA shall stipulate that the project applicant shall pay not less than the fair share contribution to mitigate project impacts.

Reference: Sections 4.7 and 5.3.7 of the Recirculated Draft SEIR.

H. Utilities and Service Systems

1. Potentially Significant Impacts Reduced to Less Than Significant Levels

Impact 4.8.1 **T**he project would require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Build-out of the RSP, including the proposed project, would result in the realignment of major storm drains in the vicinity of the RSP area to allow for RSP development and associated roadway improvements. According to the Master Plan of Drainage (Encompass Associates, 2014) prepared for the project in conjunction with the RSP EIR, the amount of stormwater that will flow into the Cactus Basin complex will actually decrease with build-out of the RSP when compared with existing conditions in the RSP area. The reduction is anticipated due to improved facilities associated with build-out of the RSP area and the overall decrease in the amount of impervious areas.

The proposed project, including the Renaissance Marketplace and Planning Area 108 components, would not result in new or previously unidentified potential impacts to stormwater infrastructure in the vicinity

of the RSP area. With the implementation of mitigation measure HYD-1, impacts related to public utilities and service systems would be reduced to less than significant levels.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant by virtue of the mitigation measure as identified in the Final EIR and incorporated into the project.

Mitigation Measure

The following mitigation measure is required to reduce the proposed project's impacts to a less than significant level:

Mitigation Measure HYD-1: Prior to issuance of grading permits, the developers or their designees shall coordinate the design and obtain approval of all flood control and storm drain structures as identified in the Renaissance Specific Plan Storm Drainage Plan. The developers or their designees shall provide evidence of this approval to the City Public Works Department. These improvements shall be consistent with any master planning efforts of the County to the satisfaction of the City Engineer.

Impact 5.3.8: The project would have cumulative utilities impacts related to the construction of new storm water drainage facilities or expansion of existing facilities and the availability of water supplies to serve the Project from existing entitlements and resources, or are new or expanded entitlements.

The cumulative projects and future City projects will most likely necessitate the expansion of existing utility (water/wastewater) facilities. As development occurs, local surface and groundwater resources will be incrementally impacted as native soils are covered over, which will decease percolation and increase runoff and urban pollutants.

Finding

Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Facts Supporting the Findings

The burden of improving these facilities will be shared amongst the additional users through payment of development impact fees, which will pay their respective "fair-share" of costs associated with required expansions at the reclamation plant. Thus, impacts in this regard will not be cumulatively considerable.

These impacts will be reduced as long as local water agencies maintain their Urban Water Management Plans, which are now required by recent changes in State law. The individual cumulative projects will be required to abide by all applicable regulations for storm water quality. These may require the preparation of the following:

• Water Quality Certifications from the RWQCB;

• SWPPP to prevent adverse water quality affects; and

• WQMP based on the nature and size of the proposed project.

These measures are required to be implemented in order to maintain effluent flows and pollutant concentrations to approximately their current levels. The City of Rialto General Plan identifies the drainage impacts of the City at buildout to be less than significant. Therefore, as long as the cumulative projects abide by the goals and policies of the General Plan and all other applicable regulations, the impacts to stormwater drainage will not be cumulatively considerable.

Mitigation Measure

The following mitigation measure is required to reduce the proposed project's impacts to a less than significant level:

Implementation of Mitigation Measure HYD-1 would reduce potential impacts to less than significant.

Reference: Sections 4.8 and 5.3.8 of the Recirculated Draft SEIR**.**

V. PROJECT ALTERNATIVES

The Final SEIR evaluated five alternatives to the proposed project. These were evaluated based on their ability to (1) reduce the significant impacts of the proposed project, and (2) attain proposed project objectives. As described earlier in this findings document, the project Proponent's objectives are the redevelopment of the site with a total of 1,651,795 square feet of total building area of Class A office space in a high-quality integrated corporate campus environment that utilizes a transit-oriented, pedestrian friendly layout and design.

The alternatives evaluated were:

- Alternative 1: No Project Alternative
- Alternative 2: Existing Specific Plan (0.60 FAR) Alternative

Based on a comparison of the impacts of each alternative, Alternative 2, Existing Specific Plan (0.60 FAR) Alternative, was identified as the "environmentally superior" alternative; however, it would result in the same significant and unavoidable impacts as the proposed project. The other alternatives would not achieve the proposed project's objectives and/or offer no substantial benefits as compared to the project as proposed, for the reasons set forth below.

A. Alternative 1: No Project Alternative

Since the approval of the RSP in 2010, several development projects have been approved and constructed within the boundaries of the Specific Plan area. The No Project – No Development Alternative assumes that no additional development would occur; the project area would remain in its existing condition.

B. Alternative 2: Reduced Site Plan Alternative

This alternative was included in the 2010 RSP EIR and would have the same results for the proposed project. This alternative proposes to reduce development within the residential and commercial areas. The proposed project includes 405 fewer residential units than the 2010 RSP and approximately 1.2 million square feet more of commercial and industrial area than the 2010 RSP. As such, the reduced Site Plan alternative would still have fewer residential units and commercial area than the proposed project. The RSP Amendment area has both residential and commercial areas within the RSP Amendment Area. Therefore, the analysis for this Alternative would remain the same for the Specific Plan Amendment as it was evaluated for the 2010 RSP. The analysis from the 2010 RSP EIR is provided below.

This alternative would develop approximately 8 million square feet of low intensity business and commercial uses as well as 800 single-family residential units on the site compared to the proposed project. Based on rates similar to those of the proposed project, this alternative would generate a population of 2,480 new residents compared to 5,167 residents from the proposed project (-54 percent), and 7,135 new employees compared to 13,618 employees under the proposed project (-47 percent). That area that would be disturbed by new development would remain essentially the same. Development under this alternative have less density and intensity compared to the proposed project. A summary of land uses for this alternative is shown in Table 7-1 compared to the Proposed RSP project.

Table 7-1 Reduced Site Plan Alternative

Land Use	Proposed RSP Amendment Project			Reduced Site Plan		
	Acres	**Square Feet**	**Units**	**Acres**	**Square Feet**	**Units**
Residential	104.5	NA	1,262	149.4	NA	800
Commercial [1]	44.8	448,668	NA	53.2	300,000	NA
Business Park [2]	539.7	10.3 M	NA	450.5	4.5 M	NA
Industrial [3]	419.3	5.9 M	NA	431.4	3.2 M	NA
Other [4]	331.2	NA	NA	360.8.3	NA	NA
TOTAL	**1,439.5**	**16.6 M** [5]	**1,262**	**1,445.3**	**8.0 M**	**800**
TOTAL	**1,439.5**	**16.6 M** [5]	**1,262**	**1,445.3**	**8.0 M**	**800**
Population	**3,912**			**2,480**		
Employment	**13,932**			**7,135**		

[1] includes freeway commercial and general commercial categories.
[2] includes town center, corporate center, business center, and freeway incubator categories.
[3] includes employment (EMP) category.
[4] includes schools, parks, private recreation, open space, paseos, buffers, utilities, and right-of-way categories.
[5] includes 835,200 sq-ft of existing uses expected to remain.
M = Million
NA = not applicable

Source: summarized from Table 3-2 from Section 3, Project Description and Draft Renaissance Specific Plan

The Reduced Site Plan Alternative would decrease a number of project impacts by approximately 50 percent (e.g., traffic, air quality, greenhouse gases, and utilities) and would reduce noise, traffic and utility impacts to less than compared to the proposed project but are also less than significant. This alternative would still have significant air quality impacts (both short- and long-term) and significant GHG impacts. Since the site would be developed with less intense development, this alternative does not achieve the objectives of the project to the same degree as the proposed project which would result in twice as much development and provide twice as many workers to the City's job base which is consistent with the State's and City's goal to use this previously developed, infill site to accommodate as much as the regions projected growth as possible.

C. Alternative 3: Mixed Use I Alternative

This alternative has the same number of dwelling units and devotes more of the non-residential uses to commercial, and less to business park and industrial uses as compared to the proposed project. This alternative would also comprise a total of 14.5 million square feet of non-residential building floor area compared to 16.6 million square feet for the proposed project (-10 percent). This alternative would emphasize more commercial development (200 acres compared to 48 acres). It would contain approximately 6.8 million square feet of business park uses, 5.7 million square feet of light industrial uses, various public uses, and the same number of residential units as the proposed RSP Amendment project. This alternative was included in the 2010 RSP EIR and would have the same results for the proposed project. The analysis from the 2010 RSP EIR is provided below.

Based on rates similar to those of the proposed project, this alternative would generate a population of 5,167 new residents (approximately same as the proposed project), and 14,433 new employees compared to 13,932 employees under the proposed project (+6 percent) even though there was a reduction of 10 percent in building square footage. A summary of land uses for this alternative is shown in Table 7-4.

Table 7-4 Mixed Use I Alternative

Land Use	Proposed RSP Amendment Project			Mixed Use I Alternative		
	Acres	Square Feet	Units	Acres	Square Feet	Units
Residential	104.5	NA	1,262	149.4.0	NA	1,262
Commercial[1]	44.8	448,668	NA	200.0	2.0 M	NA
Business Park[2]	539.7	10.3 M	NA	348.0	6.8 M	NA
Industrial[3]	419.3	5.9 M	NA	410.0	5.7 M	NA
Other[4]	331.2	NA	NA	337.9.3	NA	NA
TOTAL	**1,439.5**	**16.6 M[5]**	**1,262**	**1,445.3**	**14.5 M**	**1,667**
Population	**3,912**					
Employment	**13,932**					

[1] includes freeway commercial and general commercial categories.

[2] includes town center, corporate center, business center, and freeway incubator categories.

[3] includes employment (EMP) category.

[4] includes schools, parks, private recreation, open space, paseos, buffers, utilities, and right-of-way categories.

[5] includes 835,200 sq-ft of existing uses expected to remain.

M = Million

NA = not applicable

Source: summarized from Table 3-2 from Section 3, Project Description and Draft Renaissance Specific Plan

The Mixed Use I Alternative would increase the severity of a number of significant unavoidable adverse impacts that would also be caused by the proposed project (e.g., traffic, air quality, traffic noise, and cumulative greenhouse gas emissions) and would not lessen any impacts. In addition, while this alternative is estimated to create a slightly larger number of employees compared to the proposed project, under this alterative more of the jobs created will be retail oriented, and will tend to be part time and lower paying than jobs generated by business park or industrial uses, which counter to the State's and City's goal to use this previously developed, infill site to provide as many high-paying jobs as possible.

D. Alternative 4: Mixed Use II Alternative

This alternative was based on the original land plan for the RSP from 2006 that proposed a total of 6.8 million square feet of new development compared to 16.6 million square feet for the proposed project (+59 percent). This alternative would emphasize more residential development compared to the Proposed RSP Amendment project. It would contain approximately 6.8 million square feet of business park and light industrial uses, various public uses, and 3,853 residential units compared to the 1,262 units Proposed in

the current RSP Amendment project. This alternative was included in the 2010 RSP EIR and would have the same results for the proposed project. The analysis from the 2010 RSP EIR is provided below.

Based on rates similar to those of the proposed project, this alternative would generate a population of 11,944 new residents compared to 5,167 residents for the proposed project (+120 percent), and 6,065 new employees compared to 13,618 employees under the proposed project. A summary of land uses for this alternative is shown in Table 7-7.

Table 7-7 Mixed Use II Alternative (Summary)

Land Use	Proposed RSP Amendment Project			Mixed Use II Alternative		
	Acres	Square Feet	Units	Acres	Square Feet	Units
Residential	104.5	NA	1,262	306.9	NA	3,853
Commercial [1]	44.8	448,668	NA	43.8	0.4 M	NA
Business Park [2]	539.7	10.3 M	NA	471.9	5.3 M	NA
Industrial [3]	419.3	5.9 M	NA	98.6	1.1 M	NA
Other [4]	331.2	NA	NA	534.1	NA	NA
TOTAL	**1,439.5**	**16.6 M** [5]	**1,262**	**1,455.3**	**6.8 M**	**3,853**
Population	**3,912**			**11,944**		
Employment	**13,932**			**6,065**		

[1] includes freeway commercial and general commercial categories. M = Million NA = not applicable
[2] includes town center, corporate center, business center, and freeway incubator categories.
[3] includes employment (EMP) category.
[4] includes schools, parks, private recreation, open space, paseos, buffers, utilities, and right-of-way categories.
[5] includes 835,200 sq-ft of existing uses expected to remain.

Source: Table 3-2 in DEIR Section 3, Project Description, and Table 3-4 in Draft Renaissance Specific Plan from 2014.

The Mixed Use II Alternative would substantially decrease the magnitude of a number of project impacts that are significant, adverse and unavoidable (e.g., traffic, air quality, greenhouse gases, noise). However, with the exception of noise, these impacts would remain, significant, adverse and unavoidable. Also, this alternative does not achieve the objectives of the project to the same degree as the proposed project since it would have less than half of the employment provided by the proposed project and roughly double the number of dwelling units. The large number of homes provided in proportion to employment generating uses will also server to perpetuate the jobs/housing imbalance that exists in the Inland Empire.

E. Alternative 5: Technology/Education Park Alternative

This alternative examined impacts from a total of 20.5 million square feet of new non-residential development compared to 16.6 million square feet for the proposed project. Although it proposed more square footage, this alternative would emphasize uses that focus on new or “green” technology in a partnership with various educational uses, supported by some commercial uses along the freeway. This

alternative would contain approximately 10 million square feet of technology-oriented business and office uses, and 10 million square feet of educational oriented uses (industrial trade schools, private and/or public post K-12 schools, etc.). It would have no residential units and only 500,000 square feet of commercial uses compared to the Proposed RSP Amendment project. This alternative was included in the 2010 RSP EIR and would have the same results for the proposed project. The analysis from the 2010 RSP EIR is provided below.

Based on rates similar to those of the proposed project, this alternative would generate no new population in the City, compared to 3,912 new residents for the proposed project. It is estimated this alternative could generate 20,000 new jobs or more, but it is difficult to estimate the precise number, as the mix of school facilities to industrial or office uses is not known at this time. A summary of land uses for this alternative is shown in Table 7-10.

Table 7-10 Technology/Education Park Alternative

Land Use	Proposed RSP Amendment Project			Technology/Education Park		
	Acres	Square Feet	Units	Acres	Square Feet	Units
Residential	104.5	NA	1,262	0.0	NA	0
Commercial [1]	44.8	448,668	NA	50.0	0.5 M	NA
Business Park [2]	539.7	10.3 M	NA	525.0	10.0 M	NA
Industrial [3]	419.3	5.9 M	NA	525.0	10.0 M	NA
Other [4]	331.2	NA	NA	345.3	NA	NA
TOTAL	**1,439.5**	**16.6 M** [5]	**1,262**	**1,445.3**	**20.5 M**	**0**
Population	**3,912**			**0**		
Employment	**13,932**			**+20,000 (est.)**		

[1] includes freeway commercial and general commercial categories. M = Million NA = not applicable
[2] includes town center, corporate center, business center, and freeway incubator categories.
[3] includes employment (EMP) category.
[4] includes schools, parks, private recreation, open space, paseos, buffers, utilities, and right-of-way categories.
[5] includes 835,200 sq-ft of existing uses expected to remain.

Source: summarized from Table 3-2 from Section 3, Project Description and Draft Renaissance Specific Plan

The Technology/Education Park Alternative would substantially increase the magnitude of a number of significant adverse and unavoidable impacts (e.g., traffic, air quality, greenhouse gases, and noise) as compared to the proposed project. Since the site would be developed with more employment generating development, this alternative meets one of the major objectives better than the proposed project. However, it does not provide for a balanced community that would facilitate walk-to-work, walk-to-shop, and walk-to-play opportunities. Nor would it meet the objective of accommodating a mix of residential

housing types that serve a range of lifestyles, including first-time buyers, young singles and couples, families, empty-nesters, and seniors.

SUMMARY OF IMPACTS

Table 7-13 summarizes impacts for each alternative except the No Project Alternative in comparison to the proposed project. The No Project Alternative would have less than significant impacts or all issue areas.

Table 7-13 Summary of Impacts for Alternatives Compared to the Proposed Project

Impact Issue	Proposed Project	Reduced Site Plan	Mixed Use I	Mixed Use II	Technology/ Education
Project Residential Uses Commercial Uses Business Park Uses Lt. Industrial Uses	 1,262Units 0.45 M SF 10.3 M SF 6.0 M SF	 800 Units 0.3 M SF 4.5 M SF 3.2 M SF	 1,667 Units 2.0 M SF 6.8 M SF 5.7 M SF	 3,853 Units 0.4 M SF 5.3 M SF 1.1 M SF	 -- Units 0.5 M SF 10.0 MSF 10.0 M SF
Population	3,912	2,167	5,167	11,944	--
Employment	13,932	7,135	14,433	6,065	+20,000
Aesthetics	LTS	LTS	LTS	LTS	LTS
Agriculture	LTS	LTS	LTS	LTS	LTS
Air Quality Operation AQMP Implementation	 **Significant** **Significant**	 **Significant** **Significant**	 **Significant** **Significant**	 **Significant** **Significant**	 **Significant** **Significant**
Biological Resources	LTS	LTS	LTS	LTS	LTS
Cultural Resources	LTS	LTS	LTS	LTS	LTS
Geology & Soils	LTS	LTS	LTS	LTS	LTS
Hazards & Hazmat	LTS	LTS	LTS	LTS	LTS
Hydrology & Water Quality	LTS	LTS	LTS	LTS	LTS
Land Use & Planning	LTS	LTS	LTS	LTS	LTS
Mineral Resources	LTS	LTS	LTS	LTS	LTS
Noise (traffic noise)	**Significant**	LTS	**Significant**	LTS	**Significant**
Population & Housing	LTS	LTS	LTS	LTS	LTS
Public Services	LTS	LTS	LTS	LTS	LTS
Traffic & Circulation	**Significant (freeways)**	**Reduced 50% but Fwys still Significant**	**Reduced 12% but Fwys still Significant**	**Reduced 30% but Fwys still Significant**	**Increased 20% and Fwys still Significant**
Utilities	LTS	LTS	LTS	LTS	LTS
Climate Change	**Significant**	**Reduced but not LTS**	**Reduced but not LTS**	**Reduced but not LTS**	**Significant**
Meets Objectives?	Yes	**To a Lesser Degree**	**To a Lesser Degree**	**To a Lesser Degree**	**To a Lesser Degree**

LTS = Less Than Significant M = Million SF = Square Feet
Bold shows significant impacts or changes from impacts of the proposed Project

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Requirements under CEQA state that an Environmentally Superior Alternative be identified; that is, an alternative that would result in the fewest or least significant environmental impacts. If the No Project Alternative is the Environmentally Superior Alternative, CEQA requires that another alternative be chosen as the Environmentally Superior Alternative.

The Reduced Site Plan Alternative and the Mixed Use II Alternative substantially reduces the traffic, air quality, and greenhouse gas emission impacts of the proposed project, but not to less than significant levels. However, they both reduce noise impacts to less than significant levels. Therefore, the Reduced Site Plan or Mixed Use II Plan is considered environmentally superior to the proposed project. However, they do not achieve the objectives of the project to nearly the same degree as the proposed project.

VI. STATEMENT OF OVERRIDING CONSIDERATIONS

As set forth in the preceding sections, the City's approval of the Renaissance Specific Plan Amendment project will result in environmental impacts that cannot be substantially lessened or avoided. The following adverse impact of the proposed project is considered significant and unavoidable based on the Final SEIR, and conclusions and findings of the City Council. While mitigation measures would reduce these impacts, impacts would remain significant and unavoidable.

A. Project-Level Impacts

Impact 4.2.1: The project would conflict with or obstruct implementation of the applicable air quality plan.

Air Quality: Construction

Construction air emissions: Construction of the Project would exceed the South Coast Air Quality Management District's (SCAQMD's) regional significance emission thresholds for Volatile Organic Compound (VOC), Carbon Monoxide (CO), Nitrogen Oxides (NOx), PM10, and PM2.5 emissions during one or more of the Project's construction periods from 2009 to 2019 after application of

Air Quality: Operational

Operational emissions for criteria pollutants would exceed the SCAQMD emissions thresholds of VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$ under the previously approved RSP. As shown in Table 4.2-4 the operational emissions for the proposed RSP Amendment increase for criteria pollutants. This increase primarily due to a substantial increase in vehicle usage compared to what was calculated in 2010, and also due to more concentrated business center land use. These increases result in operational emissions that would exceed the SCAQMD daily thresholds of VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$; however, emissions of SO_X would remain lower than the SCAQMD emission threshold. As shown in Table 4.2-4 these result are consistent with the

conclusions reported in the 2010 Renaissance Specific Plan EIR. As such, the proposed project would exceed SCAQMD regional significance thresholds for criteria pollutants, Similar to the findings in 2010 RSP EIR, these impacts are considered significant.

B. Cumulative

Impact 4.2.1: The project conflict with or obstruct implementation of the applicable air quality plan.

Air Quality: Cumulative

Because construction and operational emissions would exceed SCAQMD thresholds, the proposed Project would have significant cumulative air quality impacts. No further mitigation is available to reduce this impact to a less than significant level.

Impact 4.4-1: Would the project generate greenhouse gas emissions that may have a significant impact on the environment?

Greenhouse gas emissions for the approved RSP and the currently proposed RSPA (which includes the Renaissance Marketplace and Planning Area 108). As can be seen from Table 4.4-2, operational emissions for GHG would exceed the SCAQMD proposed Tier 4 thresholds of 6.6 MT CO_{2e} per Service Population (SP) where the SP would be 17,844. The proposed RSPA would increase the GHG emissions by 294,242 MT CO_2e/yr compared to that of the approved 2010 RSP. The primary reasons for the increase in greenhouse gas emissions between the 2010 RSP and the Specific Plan amendment area is a result of the increased amount of warehouse uses (and decrease in residential uses) within the specific plan area. The increased amount of warehouse area results in a greater number of truck trips and longer trip lengths which increases the greenhouse gas emissions from transportation sources. The increased amount of warehouse use also results in increased amounts of greenhouse gas emissions from energy sources. As was the case in the 2010 RSP EIR, the proposed project would exceed SCAQMD significance thresholds for greenhouse gas emissions and these impacts are considered significant.

C. Conclusion

Section 15093 of the CEQA Guidelines requires the decision-making agency to balance the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable impacts. When the lead agency approves a project that will result in significant effects identified in the Final EIR that are not avoided or substantially lessened, the agency must state in writing the reasons in support of its action based on the Final EIR and the information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record. Accordingly, the following Statement of Overriding Considerations with respect to the proposed project's significant unavoidable impacts is hereby adopted.

The City Council has balanced the benefits of the proposed project against its unavoidable environmental risks in determining whether to approve the proposed project, and has determined that the benefits of the proposed project outweigh the unavoidable adverse environmental effects, for the following reasons:

The City Council finds that the proposed RSP Amendment would, in part, create a more efficient land use plan and to cluster similar land use types which would allow a range of housing options, including single-family (detached and attached) housing and multi-family housing, that are financially self-supporting and contribute to the City's economic base. The RSP Amendment would create an expanded Business Center capable of accommodating a wide range of land uses contributing to jobs-housing balance, including commercial, employment, business center, educational, and corporate center uses. The improved plan would ultimately create a range of job and economic development opportunities for local individuals and businesses.

The City Council finds that the economic, social and other benefits, which would result from development of this proposed project, outweigh the unavoidable environmental impact identified above. These considerations are described below. In making this finding, the City Council has balanced the benefits of the proposed project against its unavoidable environmental impacts and has indicated its willingness to accept these risks.

The City of Rialto (City) proposes to approve the Renaissance Specific Plan Amendment (project) although significant and unavoidable adverse impacts are expected to occur related to air quality impacts (construction), long-term air quality impacts (operational and cumulative), and climate change impacts (cumulative). The City has made a reasonable and good faith effort to eliminate or substantially mitigate impacts resulting from the project, as described in Section IV, above. All Mitigation Measures recommended in the EIR have been incorporated into the project and will be implemented through the Mitigation Monitoring and Reporting Program.

The project's significant adverse unavoidable impacts have been identified and evaluated in the Final Environmental Impact Report (EIR). Even though these adverse impacts are not reduced to a level considered less than significant, the City finds, after balancing these impacts with the benefits of the project, that those impacts are outweighed by the benefits of the project. The City also has examined alternatives to the proposed project. Alternatives to the project set forth in the EIR are either no better environmentally and/or infeasible because they will prohibit the realization of project objectives (and/or specific economic, social, and other benefits that the City finds outweigh any environmental benefits of the alternatives).

After extensive review of the entire administrative record, the City concludes that the potential environmental impacts of the project have been avoided or substantially lessened to the extent feasible and the remaining unavoidable impacts are acceptable in light of the benefits of the project based upon the following findings:

- The project involves the redevelopment of an underutilized, derelict and contaminated infill site, which is immediately adjacent to, and accessible from SR-210 and is entirely previously developed and entirely surrounded by developed uses. As a result of the extensive transportation network in this part of western San Bernardino County, the project site is located in one of the largest warehouse and distribution regions in the U.S. A large portion of the project is comprised of light-industrial and warehouse uses, consistent with the site's accessibility and the market and existing uses in the region. Regional and local planning encourages this type of infill and redevelopment project that enhances existing land use patterns and benefits existing employment populations. By focusing resources and development in an infill land area that has been previously developed, the project takes development pressure off of further outlying, undeveloped parcels - parcels that, unlike the project site, are not surrounded by existing development, an extensive transportation network, infrastructure, and a warehouse market. Accordingly, the project promotes a smart land use pattern and ultimately reduces greenhouse gas emissions in the process by the wise reuse of this infill site.

- The project complies with SCAG's Compass Blueprint "2% Strategy" by concentrating growth in an area near freeways and transit routes, in an existing city center, and by fulfilling its principles regarding focusing growth in existing and emerging centers and along major transportation corridors and creating significant areas of mixed use development and walkable communities.

- The project helps to carry out land use goals articulated in the City's General Plan, such as ensuring high quality planned developments in Rialto, and promoting commercial and/or industrial development that is well-designed, people-oriented, environmentally sustainable, sensitive to the needs of the visitor or resident, and functionally efficient for its purpose.

- The project helps to carry out economic development goals articulated in the City's General Plan, including providing a broader base of high-paying employment opportunities for the City of Rialto and the west San Bernardino Valley, strengthening and diversifying existing commercial areas, and utilizing the specific plan process for planning in established areas of Rialto which may undergo land use transformations.

- The project helps to carry out conservation goals articulated in the City's General Plan, including improving the balance between jobs and housing to create a more efficient urban form and/or reduce vehicle miles traveled.

- The project proposes commercial, light industrial, office, and residential uses, as well as numerous public facilities, constituting a truly integrated and mixed-use development, and that "improves the quality of planned development in the City of Rialto" pursuant to General Plan Community Design Goal 1.3.

- The proposed project would ultimately house approximately 3,963 residents and would allow residents the opportunity to live, work, and play in the immediate area. This reduces the need to use the automobile, which in turn reduces congestion, improves air quality, fosters walking, and improves overall health and wellness.

- The proposed project would facilitate walk-to-work, walk-to-shop, and walk-to-play opportunities by offering open spaces, paseos, walkable streets, proximity of uses, strategically located recreational facilities, and a desirable range of amenities.

- The Renaissance Specific Plan Amendment is a significant opportunity for the City to achieve many goals described in its General Plan, such as providing housing types suitable for a variety of lifestyles and incomes. The Renaissance Specific Plan accommodates a range of living opportunities including detached residential homes, small-lot detached homes, contemporary townhouses, and condominiums to accommodate a mix of residential housing types that serve a range of lifestyles, including first-time buyers, young singles and couples, families, empty-nesters, and seniors.

- The proposed project will complete the Renaissance Specific Plan with necessary infrastructure while incorporating high quality, consistent design standards. Infrastructure necessary to support the project will be required. project buildings, in conjunction with substantial landscaping, will be well-designed, of high-quality, and visually attractive.

- The proposed project provides additional employment opportunities on the project site. The Final EIR estimates that the proposed project will generate approximately 7,023 jobs, many of which will consist of highly trained workers and high-paying jobs.

- The project will provide a blend of professional offices, light industrial, research and development, Business Park, and retail commercial uses in the northeastern portion of the City that would provide opportunities for a range of employment.

- The proposed blend of professional offices, light industrial, research and development, Business Park, and retail commercial uses will be of benefit in that the proposed project will attract a wide range of new businesses to the currently vacant project site.

- The proposed project will provide new development that will assist the City in obtaining fiscal balance in the years and decade ahead. The establishment of a mixed use specific plan on the currently vacant project site will increase property and other tax revenues, and the influx of new jobs into this area will benefit existing and future retail and services businesses in the area of the project.

- The proposed project will provide convenient access the adjacent SR-210 from the project site in a manner that minimizes traffic through residential areas within the City of Rialto.

- The project will provide for the redevelopment of the Rialto Municipal Airport and surrounding areas in such a manner as to create a new and dynamic district within Rialto that will enhance the City's visibility, employment base, and housing stock.

- The project will provide for the smooth transition of general aviation uses from the project site. The project will provide funding for various elements of regional infrastructure through the City's mitigation fee programs.

The Council hereby finds that each of the reasons stated above constitutes a separate and independent basis of justification for the Statement of Overriding Considerations, and each can independently support the Statement of Overriding Considerations and override the proposed project's unavoidable environmental effects. In addition, each reason is independently supported by substantial evidence contained in the administrative record.

All proposed project impacts, including the effects of previously identified direct and cumulative impacts, are covered by this Statement of Overriding Considerations.

VII. MITIGATION MONITORING AND REPORTING PROGRAM

The City Council recognizes that any approval of the proposed project would require concurrent approval of a Mitigation Monitoring and Reporting Program (MMRP), which ensures performance of identified mitigation measures. Such an MMRP would need to identify the entity responsible for monitoring and implementation, and the timing of such activities. The City will use the MMRP to track compliance with proposed project mitigation measures. The MMRP will remain available for public review during the compliance period. The MMRP is included as part of the Final SEIR, and is hereby incorporated by reference, and attached as Exhibit A to this Resolution.

VIII. RECORD OF THE PROCEEDINGS

The documents and other materials that constitute the record of proceedings on which the Council bases the Findings are located at the Development Services Department, 150 South Palm Avenue, Rialto, California 92376. The custodian for these documents and materials that constitute the record is the City of Rialto Development Services Department. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and Title 14 California Code of Regulations (CEQA Guidelines) Section 15091(e).

The environmental analysis provided in the EIR and these findings are based on and are supported by the following documents, materials and other evidence, which constitute the administrative record for the approval of the project:

A. All application materials for the project and supporting documents submitted by the applicant, including but not limited to those materials constituting the project and listed in Section III of these findings.

B. The NOP, comments received on the NOP and all other public notices issued by the City in relation to the EIR (e.g., Notice of Availability).

C. The Recirculated Draft EIR, the Final EIR, all appendices to any part of the SEIR, all technical materials cited in any part of the SEIR, comment letters, oral testimony, responses to comments, as well as all of the comments and staff responses entered into the record orally and in writing between September 26, 2016 and November 10, 2016.

D. All non-draft and/or non-confidential reports and memoranda prepared by the City and consultants related to the EIR, its analysis and findings.

E. Minutes and transcripts of the discussions regarding the project and/or project components at public hearings or scoping meetings held by the Planning Commission and the City Council.

G. Staff reports associated with Planning Commission and Council Meetings on the project and supporting technical memoranda and any letters or other material submitted into the record by any party.

H. Matters of common knowledge to the Planning Commission and City Council which they consider, such as the Rialto General Plan, any other applicable specific plans or other similar plans, and the Rialto Municipal Code.

IX. INCORPORATION BY REFERENCE

In addition to the Final SEIR, the following document is incorporated into these Findings by reference in its entirety:

- City of Rialto, *Renaissance Specific Plan EIR*. Certified November 19, 2010.

Without limitation, this incorporation is intended to elaborate on the scope and nature of project and cumulative impacts, related mitigation measures, the basis for determining the significance of impacts, and the comparative analysis of alternatives.

X. SUMMARY

A. Based on substantial evidence in the foregoing Findings and in the information contained in the record, the Council has made the following findings with respect to each of the significant effects of the proposed project identified in the Final SEIR:

1. Changes or alterations have been required in, or incorporated into, the proposed project which avoid or substantially lessen the significant environmental effect on the environment.

   Those changes or alterations that are within the responsibility and jurisdiction of another public agency have been, or can and should be, adopted by that other agency.

   Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final SEIR that would otherwise avoid or substantially lessen identified significant environmental effects on the proposed project.

2. Based on the foregoing Findings and the information contained in the record, it is determined that:

   With the exception of impacts in the area of Air Quality and Greenhouse Gas Emissions, all significant effects on the environment due to the approval of the proposed project have been eliminated or substantially lessened where feasible.

   The remaining significant effects found to be unavoidable are acceptable due to the factors described above in the Statement of Overriding Considerations.

Appendix C

Mitigation Monitoring and Reporting Program

CITY OF RIALTO

RENAISSANCE SPECIFIC PLAN AMENDMENT

MITIGATION MONITORING AND REPORTING PROGRAM

SCH No. 2006071021

Environmental Assessment Review No. 16-55
Airport Specific Plan Amendment No. 6
Renaissance Specific Plan Amendment No. 3
Tentative Parcel Map No. 19779
Conditional Development Permit No. 823
Development Agreement No. 16-04

Prepared for:

City of Rialto
Development Services Department
Planning Division
150 S. Palm Avenue
Rialto, California 92376
Contact: Gina Gibson, Planning Manager

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INTRODUCTION

This document is the Mitigation Monitoring and Reporting Program (MMRP) for the Renaissance Specific Plan Amendment Subsequent Environmental Impact Report (SEIR). This MMRP has been prepared pursuant to Section 21081.6 of the California Public Resources Code which requires public agencies to "adopt a reporting and monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." An MMRP is required for the proposed project because the SEIR has identified significant adverse impacts, and measures have been identified to mitigate those impacts. The numbering of the individual mitigation measures follows the numbering sequence as found in the SEIR. Applicable mitigation measures of the program-level Renaissance Specific Plan EIR, certified in 2010 are also included. Those mitigation measures retain their original numbering as well. Revisions to mitigation measures that were necessary as a result of responding to public comments and incorporating staff-initiated revisions have been incorporated into this MMRP.

MITIGATION MONITORING AND REPORTING PROGRAM

The MMRP, as outlined in the following table, describes mitigation timing, monitoring responsibilities, and compliance verification responsibility for all mitigation measures identified in the Draft SEIR as well as any measures that were revised as part of the Final SEIR. The MMRP is presented in tabular form on the following pages. The components of the MMRP are described briefly below:

- Mitigation Measures: The mitigation measures are taken verbatim from the Draft SEIR, as well as any measures which were revised as part of the Final SEIR, in the same order that they appear in the Draft SEIR.
- Implementation Responsibility: Identifies the project applicant, department within the City, or other entity responsible for implementing the mitigation measure.
- Monitoring Responsibility: Identifies the department within the City, project applicant, or consultant responsible for mitigation monitoring.
- Mitigation Timing: Identifies at which stage of the project mitigation must be completed.
- Compliance Verification Responsibility: Identifies the department of the City or other State agency responsible for verifying compliance with the mitigation.

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Mitigation Monitoring and Reporting Program Table

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
AESTHETICS					
From 2016 SEIR: **AES-1: Pursuant to Section 15.32 of the City's Municipal Code** Prior to the issuance of grading permits, the project applicant shall submit to the satisfaction of the Public Works Director, evidence that all electrical distribution lines of 16,000 volts or less, telephone lines, cable antenna television and similar service wires or cable, which provide direct service to the property being developed, shall be installed underground.	Project Applicant	City of Rialto Public Works Department	Shown on grading or improvement plans.	☐ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
AIR QUALITY					
From 2010 EIR: **AQ-1:** Prior to construction of the project, the project proponent shall prepare a Large Operation Notification that will describe the application of standard best management practices to control dust during construction. Best management practices (BMP) will include application of water on disturbed soils a minimum of three times per day, covering haul vehicles, replanting disturbed areas as soon as practical, and restricting vehicle speeds on unpaved roads to 15 mph, and other dust control measures, as deemed appropriate to the site or as included in the South Coast Air Quality Management District (SCAQMD) Rule 403. The Large Operation Notification shall be submitted to the City and SCAQMD for approval prior to construction.	Project Applicant	City of Rialto Public Works Department	Written Evidence of submittal of the Large Operation Notification.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: **AQ-2:** During project construction, construction equipment shall be properly maintained at an offsite location in accordance with manufacturer's specifications; maintenance shall include proper tuning and timing of engines. The equipment maintenance records and equipment design specification data sheets shall be available during construction and subject to inspection.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Direct observations, site inspections, review of equipment maintenance records.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
From 2010 EIR: **AQ-3:** During project construction, the developer shall require all contractors to turn off all construction equipment when not in use or limit idling to less than 5 minutes.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Direct observations, site inspections.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: **AQ-4:** Prior to construction of the project, the project proponent shall prepare a Traffic Control Plan and submit it to the City of Rialto. The Plan shall describe in detail safe detours around the project construction site and congested streets. The Plan shall provide temporary traffic control (e.g., flag person) during construction-related truck hauling activities. The Plan is primarily intended as a safety measure but also can minimize traffic congestion and delays that increase idling and acceleration emissions. The Plan shall include the scheduling of construction truck trips during non-peak hours to reduce peak hour emissions. The Plan shall include the consolidation of truck deliveries, where feasible. The Plan shall also provide for dedicated turn lanes for movement of construction vehicles onsite and offsite. The Plan shall also provide for proper configuration of construction parking to minimize traffic interference. The Plan shall be prepared in accordance with U.S. Department of Transportation Federal Highways Administration Rule on Work Zone Safety 23 CFR 630 Subpart J, Developing and Implementing Traffic Management Plans for Work Zones.	Project Applicant	City of Rialto Public Works Department	Submittal/ approval of Traffic Control Plan.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: **AQ-5:** Contractors shall construct/build with materials that do not require painting and use pre-painted construction materials to the extent practicable; and use high-pressure-low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency. All paints shall be low Volatile Organic Compound (VOC) content paints. For a list of low VOC paints, see www.aqmd.gov/prdas/brochures/paintguide.html.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Inclusion of materials and paints to be used on building plans site inspection	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
From 2010 EIR: **AQ-6:** Prior to issuance of a grading permit, a Construction Employee Trip Reduction Plan shall be created. Included in the Plan shall include a shuttle service to and from retail establishments during lunch hour and/or an onsite lunch service. The Plan shall also include carpooling and/or transit incentives for the construction employees.	Project Applicant	City of Rialto Development Services Department, Planning Division	Submittal of Construction Employee Trip Reduction Plan to City.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: **AQ-7:** During project construction, onsite electrical hook ups shall be provided for electric construction tools including saws, drills and compressors, to eliminate the need for diesel powered electric generators.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Reference to onsite electrical hook-ups on Grading Plan and Building Plan notes. Site inspection.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: **AQ-8:** Grading activity shall not occur on days with an Air Quality Index forecast for San Bernardino County greater than 100 for particulates or ozone. The categories where grading shall not occur are: unhealthy for sensitive groups, unhealthy, very unhealthy, or hazardous. Air Quality Index forecasts can be obtained at the website: www.airnow.gov/index.cfm?action=airnow.showloc al&CityID=211.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Site inspection.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: **AQ-10:** The following shall be included in the Specific Plan: • Synchronize traffic lights on streets impacted by development; • Light colored roofing materials shall be used on all exposed roofs; • Preferential parking for carpool/vanpool vehicles at the non-residential uses; • Secure weather-protected bicycle parking for employees at the non-residential uses; • Connect bicycle lanes/paths to project-wide network; • Provide showers and lockers for employees bicycling or walking to work at the non-residential uses where feasible;	Project Applicant	City of Rialto Development Services Department, Planning Division	Inclusion in the Renaissance Specific Plan.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
• Short-term bicycle parking for retail customers and other non-commuting trips; and • Construct transit facilities such as bus turnouts, benches, and shelters that encourage mass transit usage and provide safe pedestrian access from proposed project facilities to transit stops					
From 2010 EIR: AQ-11: Within the warehouse and distribution center uses, warehouse managers and employees shall be trained on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. All dock and delivery areas shall be posted with signs informing truck drivers of the California Air Resources Board regulations including the following: a) Truck drivers shall turn off engines when not in use; and b) All diesel delivery trucks servicing the project shall not idle for more than five (5) minutes per truck trip per day.	Project Applicant	City of Rialto Development Services Department, Planning Division	Inclusion as a condition of approval of applicable land use applications.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: AQ-12: A minimum of ten percent of the loading docks for the warehouse/distribution center uses shall contain outdoor electrical hook-up sources for service equipment and trucks such as transportation refrigeration units. In addition, electrical hookups shall be provided at the loading docks located at refrigerated warehouses for transportation refrigeration units visiting these locations. All trucks with transportation refrigeration units are required to connect to the electrical hookups while loading or unloading deliveries to the proposed project. Trucks with transportation refrigeration units are prohibited from accessing refrigerated warehouses unless they have the capability to connect to the electrical hookups.	Project Applicant	City of Rialto Development Services Department, Planning Division	Review of site plans, conditions of approval for Warehouse distribution centers.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: AQ-1: Standard Air Quality Conditions *Construction Activity* Prior to the issuance of grading permits, the project applicant shall submit to the satisfaction of the Public Works Director and Planning Division, evidence that development within the Renaissance	Project Applicant	City of Rialto Public Works Department	Shown on grading or improvement plans.	☐ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
Marketplace and Planning Area 108 will comply with regional rules that assist in reducing short-term air pollutant emissions. SCAQMD Rule 403 requires that fugitive dust be controlled with best-available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. Applicable dust suppression techniques from Rule 403 are summarized below. Implementation of these dust suppression techniques can reduce the fugitive dust generation (and thus the PM_{10} component). Compliance with these rules would reduce impacts on nearby sensitive receptors (see SCAQMD Rule 403).[1] This applicable Rule measures as follows: • Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more). • Water active sites at least twice daily. (Locations where grading is to occur will be thoroughly watered prior to earthmoving.) • Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 ft) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code (CVC) Section 23114. • Pave construction access roads at least 100 ft (30 m) onto the site from the main road. • Reduce traffic speeds on all unpaved roads to 15 mph or less. The applicable California Department of Resources Recycling and Recovery (CalRecycle) Sustainable (Green) Building Program Measures are: • Recycle/reuse at least 50 percent of the construction material including, but not limited to, soil, mulch, vegetation, concrete, lumber, metal, and cardboard. 2 • Use "green building materials" such as those materials that are rapidly renewable or resource-efficient, and recycled and manufactured in an environmentally friendly way, for at least 10 percent of the project.				☐ PA 108	

[1] South Coast Air Quality Management District (SCAQMD). Rule 403. Website: http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf, accessed October 2015.

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
Operations Prior to the issuance of building permits, the project applicant shall submit to the satisfaction of the Public Works Director, evidence that development within the Renaissance Marketplace and Planning Area 108 comply with Title 24 of the California Code of Regulations (CCR) established by the CEC regarding energy conservation and green buildings standards. The project applicant shall incorporate the following in building plans: • Low-emission water heaters shall be used. Solar water heaters are encouraged. • Exterior windows shall utilize window treatments for efficient energy conservation. These measures will result in reduced emissions during the construction and operation phases of the proposed Renaissance Marketplace and Planning Area 108 projects.					
From 2016 EIR: **AQ-2: Sensitive Receptors – 500-Foot Buffer** Prior to the issuance of any grading permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the following uses will not be located within the distance specified from an existing or future sensitive receptor (residence, school, hospital, nursing home, day care centers, parks and playgrounds): within 500 feet of the 210 Freeway; within 500 feet of the equipment within a dry cleaning facility utilizing Perchloroethylene; and within 300 feet of a fueling station facility (i.e. fuel pumps). These facilities may be located closer than the proscribed distances if a project-specific health risk assessment is performed that demonstrates that the project-specific health risk impacts do not exceed the South Coast Air Quality Management District's health risk significance thresholds. Note: This mitigation measure satisfies mitigation measure AQ-13 from the 2010 EIR.	Project Applicant	City of Rialto Development Services Department, Planning Division	Site plan review, conditions of approval for applicable land use applications.	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 EIR: **AQ-3: Sensitive Receptors – 1,000-Foot Buffer** Prior to the issuance of any grading permits, the project applicant shall submit, to the satisfaction of the Public Works Director and	Project Applicant	City of Rialto Development Services Department,	Site plan review, conditions of approval for applicable land use applications.	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance	Initials: _____ Date: _____ Initials: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
Planning Division, evidence that the following uses will not be located within 1000 feet of a nearby sensitive receptor (occupied portions of existing or future residences, schools, hospitals, nursing homes, day care centers, parks, and playgrounds): a warehouse, distribution center, or logistics center unless a project-specific health risk assessment is performed that demonstrates that the project-specific health risk impacts do not exceed the South Coast Air Quality Management District's health risk significance thresholds. Note: This mitigation measure satisfies mitigation measure AQ-14 from the 2010 EIR.		Planning Division		Marketplace ☐ PA 108	Date: _____
From 2016 EIR: **AQ-4: Off-Road Diesel Equipment** Prior to the issuance of any grading permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that offroad diesel-powered construction equipment greater than 50 horsepower will meet the Tier 4 emission standards, where feasible. In addition, where feasible all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the Air Resources Board (ARB). Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by ARB regulations. Note: This mitigation measure satisfies mitigation measure AQ-9 from the 2010 EIR.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Referenced as a note on grading plans and building plans. Site inspection.	☐ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 EIR: **AQ-5: Construction Equipment Tier Specification** Prior to the mobilization of each applicable offroad diesel-powered construction equipment greater than 50 horsepower, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, a copy of the certified tier specification, Best Available Control Technology (BACT) documentation, and Air Resources Board or South Coast Air Quality Management District's operating permit for each shall be provided at the time of mobilization of each applicable unit of equipment. Note: This mitigation measure satisfies mitigation measure AQ-9 from the 2010 EIR.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Referenced as a note on grading plans and building plans. Site inspection.	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
From 2016 SEIR: AQ-6: Truck Building Access Prior to the issuance of any grading permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the following truck access routes have been incorporated into the project design, to the maximum extent practicable, to reduce air quality and potential future health risk impacts from the operation phases of the proposed project: • Design warehouse/distribution centers such that entrances and exits discourage that trucks from traversing past neighbors or other sensitive receptors. • Design warehouse/distribution centers such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility. • Establish area(s) within the facility for repair needs. • Provide electrical service capacity for equipment at facilities.	Project Applicant	City of Rialto Public Works Department	Shown on grading or improvement plans.	☐ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: AQ-7 Truck Routes Prior to the issuance of any grading permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the following truck access routes have been incorporated into the project design, to the maximum extent practicable, to reduce air quality and potential future health risk impacts from the operation phase of the proposed project, if feasible: • Develop, adopt and enforce truck routes both for entering and leaving the city and in and out of facilities; keeping in mind common pedestrian routes, especially for schools. • Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas. • Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride. • Where there are traffic impacts, improve traffic flow by signal synchronization.	Project Applicant	City of Rialto Public Works Department	Shown on grading or improvement plans.	☐ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
From 2016 SEIR: AQ-8: Super-Compliant VOC Paints Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the construction contractor shall be required to utilize Super-Compliant VOC paints, which are defined by SCAQMD as meeting the "super-compliant" VOC standard of 10 grams per liter (g/L). Use of HVLP or electrostatic spray equipment shall be encouraged.	Project Applicant	City of Rialto Public Works Department	Shown on building plans.	☐ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: AQ-9: Exterior and Interior Finishes Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that exterior and interior finishes that do not require painting shall be used where feasible.	Project Applicant	City of Rialto Public Works Department	Shown on building plans.	☐ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: AQ-10: Building Orientation Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that buildings have been oriented and incorporate landscaping to maximize passive solar; heating during cool seasons, and minimize solar heat gain during hot seasons where feasible depending upon site condition and topography.	Project Applicant	City of Rialto Public Works Department	Shown on building plans.	☐ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: AQ-11: Title 24 Standards Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the building design has met the requirements of 2016 Title 24 standards for building and site efficiency to reduce energy and water usage.	Project Applicant	City of Rialto Public Works Department	Shown on building plans.	☐ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: AQ-12: Energy Efficiency Education Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that building tenants shall be encouraged to educate employees on energy efficiency measures.	Project Applicant	City of Rialto Public Works Department	Shown on building plans.	☐ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
From 2016 SEIR: AQ-13: Preferential Parking Spaces Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that preferential parking spaces shall be offered to car pools and van pools.	Project Applicant	City of Rialto Public Works Department	Shown on building plans.	☐ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: AQ-14: Electrical Hookup Capacity Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that building designs provide electrical capacity for installation of electrical hookups at onsite loading docks and for electric vehicle charging stations.	Project Applicant	City of Rialto Public Works Department	Shown on building plans.	☐ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: AQ-15: Warehouse Employee Amenities Prior to the issuance of any building permits, the project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that warehouse and industrial buildings that exceed 500,000 square feet provide on-site food vending machines, refrigerator, and microwave for project employees.	Project Applicant	City of Rialto Public Works Department	Shown on building plans.	☐ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
BIOLOGICAL RESOURCES					
From 2016 EIR: BIO-1: California Gnatcatcher Prior to the issuance of grading permits, the project applicant shall submit to the satisfaction of the Development Services Director/Planning Division, evidence that focused surveys have been undertaken to determine the presence/absence of this species as indicated below. Surveys shall follow protocols established by the U.S. Fish and Wildlife Service (USFWS). Portions of the Project area have been determined to contain suitable habitat for California Gnatcatcher (CAGN) (Planning Areas 58, 104, 108, 110, 113, 114, 115, and 119, as appropriate). Prior to development of those planning areas, focused surveys must be undertaken to determine the presence/absence of this species. Surveys shall follow protocols established by the USFWS. In the event that CAGN is detected or observed within the disturbance	Project Applicant	City of Rialto Development Services Department, Planning Division	Imposition of conditions of approval for applicable land use applications. If applicable, written evidence of completion of and compliance with requirements related to consultation with the U.S. Fish and Wildlife Service under Section	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
footprint, avoidance, minimization, and mitigation measures shall be developed and implemented through consultation with the USFWS under Section 10 of the Federal Endangered Species Act (FESA) (or Section 7 as appropriate). At a minimum, mitigation measures will include the timing of construction activities outside of the breeding season (February 15 to August 31) and/or the purchase/conservation of offsite suitable habitat that is known to support CAGN at a minimum 1:1 ratio depending on the quality of habitat removed compared to the quality of habitat provided. Specific ratios will be determined in consultation with USFWS. Prior to the issuance of occupancy permits, the developer shall provide evidence of applicable species mitigation agreements/permits to the Development Services Director/Planning Division. Note: This mitigation measure satisfies mitigation measure BIO-1 from the 2010 EIR.			10 or Section 7 of the Federal Endangered Species Act.		
From 2016 SEIR: **BIO-2: San Bernardino Kangaroo Rat** Prior to the issuance of grading permits, the project applicant shall submit to the satisfaction of the Development Services Director/Planning Division, evidence that focused surveys have been completed by a qualified biologist to determine the presence/absence of San Bernardino Kangaroo Rat (SBKR) in areas of suitable habitat within the RSP Amendment Area. Surveys shall follow protocols established by the USFWS. In the event that SBKR is detected or observed within the disturbance footprint, avoidance, minimization, and mitigation measures shall be developed and implemented through consultation with the USFWS under Section 10 of the FESA (or Section 7 if appropriate). At a minimum, mitigation measures will include the purchase/conservation of offsite suitable habitat that is known to support SBKR at a minimum 1:1 ratio depending on the quality of habitat removed compared to the quality of habitat provided. Specific ratios will be determined in consultation with USFWS. Prior to the issuance of occupancy permits, the developer shall provide copies of applicable species mitigation agreements or permits to the Development Services Director/Planning Division. Note: This mitigation measure satisfies mitigation measure B-02 from the 2010 EIR.	Project Applicant	City of Rialto Development Services Department, Planning Division	Imposition of conditions of approval for applicable land use applications. If applicable, written evidence of completion of and compliance with requirements related to consultation with the USFWS under Section 10 or Section 7 of the Federal Endangered Species Act.	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
From 2016 SEIR: BIO-3: Burrowing Owl Prior to the issuance of grading permits and/or an action that would result in project site disturbance (whichever occurs first) (including but not limited to discing and demolition activities), the applicant shall submit to the satisfaction of the Development Services Director/Planning Division, evidence that focused clearance surveys have been completed to determine the presence/absence of burrowing owls (BUOW). Pre-construction surveys for BUOW shall be required in accordance with protocols established by California Department of Fish and Wildlife (CDFW) before the start of grading activities to confirm the absence of BUOW from the site. If the survey determine the BUOW to be present, protective measures shall be required to ensure compliance with the Migratory Bird Treaty Act and other applicable CDFW Code requirements and include, but are not limited to the following: • Occupied BUOW shall not be disturbed during nesting season unless a qualified biologist verifies through non-invasive methods that either 1) the birds have not begun egg-laying or incubation or 2) that juveniles from the occupied burrows are foraging independently and are capable of an independent survival flight. • All relocation shall be approved by the CDFW. The permitted biologist shall monitor relocated owls a minimum of three days per week for a minimum of three weeks. A report summarizing the results of the relocation and monitoring shall be submitted to the CDFW within 30 days following completion of the relocation and monitoring of the BUOW. • A BUOW Long-term Management Plan (LTMP) shall be prepared by a qualified biologist and submitted to the CDFW for review and approval prior to relocation of owls. The BUOW LTMP shall describe proposed relocation, biological monitoring, and long-term management. The plan shall include the number and location(s) of occupied BOUW sites and details on suitable habitat at the receiver site selected and approved for relocation. The LTMP shall also describe specific procedures to compensate for impacts to BUOW/occupied burrows at the Project area. Such procedures may include, but are not limited to, the purchase/conservation of offsite suitable habitat that is known to support BUOW at a minimum 1:1 ratio depending on the quality of habitat removed compared to the quality of	Project Applicant	California Department of Fish and Wildlife	Pre-Construction Survey (if required): 30 days prior to issuance of a grading permit and/or an action that would result in project site disturbance (whichever occurs first) If present, preparation and approval of BUOW Mitigation Monitoring Plan. Implementation of Plan prior to issuance of a grading permit and/or an action that would result in project site disturbance (whichever occurs first)	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
habitat provided. Specific ratios will be determined in consultation with CDFW. Prior to the issuance of occupancy permits, the developer shall provide copies of applicable species mitigation agreements/permits to the Development Services Director/Planning Division. Note: This mitigation measure satisfies mitigation measure B-03 from the 2020 EIR.					
From 2016 SEIR: **BIO-4: Focused Plant Surveys** Prior to the issuance of grading permits or and/or an action that would result in project site disturbance (whichever occurs first) (including but not limited to discing and demolition activities), the project applicant shall submit to the satisfaction of the Development Services Director/Planning Division, evidence from a qualified biologist that the project site does not contain suitable habitat for Plummer's mariposa-lily or Parry's spineflower. Should the project site be located within an area that does have potential for Plummer's mariposa-lily or Parry's spineflower, the applicant shall provide evidence that a focused plant survey for Plummer's mariposa-lily and Parry's spineflower has been conducted during the appropriate blooming season (generally May to July for Plummer's mariposa-lily and April to June for Parry's spineflower). If the survey results are negative for the presence of Plummer's mariposa-lily or Parry's spineflower, then no further action is required. If the surveys are positive for the presence of Plummer's mariposa-lily or Parry's spineflower, then their distribution and associated natural plant community shall be documented and a formal report submitted to the California Department of Fish and Wildlife. These data will then be used to determine the level of impact to each identified species from project development. Impacts on sensitive plants shall be mitigated offsite at a minimum 2:1 ratio. Conservation credits for each of these species can be purchased at an approved conservation bank such as the Cajon Creek Conservation Bank.	Project Applicant	City of Rialto Development Services Department, Planning Division	Imposition of conditions of approval for applicable land use applications. If applicable, written evidence of completion of and compliance with requirements related to consultation with the CDFW.	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: **BIO-5: Riversidian Alluvial Fan Sage Scrub** Prior to the issuance of grading permits, the project applicant shall submit to the satisfaction of the Development Services	Project Applicant	City of Rialto Development Services Department,	Imposition of conditions of approval for applicable land use applications.	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
Director/Planning Division, evidence that preservation of RAFSS habitat with equal or better habitat value has been preserved at a suitable location where the long-term viability of the habitat can be assured. Satisfactory evidence includes, but is not limited to evidence that the appropriate amount (to be determined by the City of Rialto, the California Department of Fish and Wildlife [CDFW], and the project applicant) has been purchased at an approved mitigation bank, or that a long-term conservation plan that has been developed and implemented as part of longer-term mitigation strategy for multiple projects. Any long-term conservation plan must be presented to the City of Rialto and CDFW for review and comment as part of any needed incidental take permits.		Planning Division	If applicable, written evidence of completion of and compliance with requirements related to consultation with the CDFW.	Marketplace ☐ PA 108	
From 2016 SEIR: **BIO-6: Migratory Birds** Prior to the issuance of grading permits and/or an action that would result in project site disturbance (whichever occurs first) (including but not limited to discing and demolition activities), the project applicant shall submit to the satisfaction of the Development Services Director/Planning Division, evidence that a pre-construction nesting bird survey has been conducted prior to any ground disturbing activities and removal of vegetation or other potential nesting habitat during the nesting period (generally February 1st to August 31st). If birds are found to be nesting inside or within 250 feet (500 feet for raptors) of the impact area, construction will need to be postponed, at the discretion of a qualified biologist, until it is determined that the nests are no longer active.	Project Applicant	City of Rialto Development Services Department, Planning Division	Land use application review/conditions of approval.	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
CULTURAL RESOURCES					
From 2010 EIR: **CR-1:** When site specific design plans are submitted for approval within the Renaissance Specific Plan and associated project-level CEQA documentation prepared, a finding of significance must be established for all cultural resources located within the proposed Planning Area based upon the inventory of cultural resources provided in the Phase I Cultural Resources Assessment (MBA 2006e). As shown in Table 4.5-2 of the 2010 DEIR, 25 Planning Areas exhibit one or more cultural resources. Prior to City approval	Project Applicant	City of Rialto Development Services Department, Planning Division	Preparation of significance evaluations as applicable. Recordation of cultural resources as applicable.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
of plans for development, significance evaluations of the resource(s) located in the specific Planning Area(s) must be conducted by a qualified professional. Recordation of identified cultural resources onto DPR523 form sets shall be undertaken during the significance evaluation(s), if such recordation has not yet occurred, as established under rules and regulations regarding such matters in effect at the time of the evaluation. This measure shall be implemented to the satisfaction of the City Development Services Director.					
From 2010 EIR: CR-2: Should implementation of CR-1 show that an area proposed for development contains a significant cultural resource, that resource must be avoided or mitigated. Isolated artifacts are excluded from this restriction as they are not considered significant resources by the OHP. If it is determined that the proposed project will directly impact a potentially significant resource and that the resource cannot be avoided, then mitigation for impacts to the individual resource(s) must be proposed. The mitigation plan document must contain a description of how and where artifacts will be curated if found during the fieldwork, and contingency plans associated with Native American tribal efforts if the recovered artifacts are considered sacred items by one or more Native American tribes. For prehistoric archaeological sites only, monitoring of the work by a selected Native American group must take place. This measure shall be implemented to the satisfaction of the City Development Services Director.	Project Applicant	City of Rialto Development Services Department, Planning Division	Preparation and compliance with applicable mitigation plan to protect the significant cultural resource in question (if applicable).	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: CR-3: If a cultural resource is determined to be significant during the testing process, continued impacts to those sites would also be considered significant. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in greenspace, parks, or open space, or Phase III data recovery excavations of the finds. This measure shall be implemented to the satisfaction of the City Development Services Director.	Project Applicant	City of Rialto Development Services Department, Planning Division	Preparation and compliance with applicable mitigation plan to protect the significant cultural resource in question (if applicable).	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: CR-4: Monitoring of development-related excavation is required during all construction-related ground disturbances that take place along Baseline Road, Alder Avenue, Laurel Avenue, Locust Avenue,	Project Applicant	City of Rialto Development Services Department,	Establishment of monitoring procedures. Site observation.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance	Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
Linden Avenue and Maple Avenue in the southern portion of the project area. Specifically, monitoring is recommended for the entire southern portion of the project area, from Baseline Road to a northern point marked by an east-west extension of Walnut Avenue. This is due to the high level of historic development in the southern portion of the project area, and the resultant high probability that significant, intact subsurface deposits would be found. These monitoring procedures shall be directed by the project archaeologist and discussed with the general contractor onsite before construction begins. Construction-related disturbances in the southern portion of the project area should be monitored on a full-time basis by a qualified cultural resource professional or the project archaeologist. Once 50 percent of the earth to be moved during grading has been examined, the project archaeologist may, at his or her discretion, terminate monitoring if and only if no buried cultural resources have been detected. If buried cultural resource sites are detected during monitoring, no matter whether such resources are significant or not, monitoring must continue until 100 percent of the earth within the southern portion of the project has been disturbed and inspected by the monitor(s). If sites are exposed during construction, they should be handled in the manner established in Mitigation Measures 5-1 through 5-3. This measure shall be implemented to the satisfaction of the City Development Services Director.		Planning Division		Marketplace ☐ PA 108	Initials: _____ Date: _____
From 2010 EIR: **CR-5:** Prior to the issuance of grading permits in that portion of the Specific Plan area located between Linden Avenue and the eastern project boundary (ie: Planning Area 6, 7, 8, 9, 28, 29, 45, 46, 47, 48, 49a, 49b, 49c, 50, 53, 54, 55, 56, 57, 58, 60c, 62, 63, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81), a paleontologic field survey shall be conducted prior to development-related earthmoving activities to determine the paleontologic sensitivity of the Pleistocene eolian dune sands. This survey shall be conducted by a qualified vertebrate paleontologist with experience in regional geology. If this field survey results in a determination of high paleontologic sensitivity, a paleontologic monitoring program shall be implemented. This monitoring program shall be consistent with the provisions of California Environmental Quality Act (CEQA) and with the guidelines of the Society of Vertebrate Paleontology. If a monitoring program is found to be required and is implemented, monitoring may be reduced or eliminated if the sensitive deposits	Project Applicant	City of Rialto Development Services Department, Planning Division	Completion of a paleontologic field survey and, if necessary, preparation and implementation of paleontological monitoring program.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
are determined upon exposure and examination by qualified paleontologic personnel to have low potential to contain fossil resources. If the field assessment determines that the Pleistocene eolian dune sands have low paleontologic sensitivity, no program to mitigate adverse impacts to paleontologic resources will be necessary. This measure shall be implemented to the satisfaction of the City Development Services Director.					
GEOLOGY, SOILS AND SEISMICITY					
From 2010 EIR: GS-1: Prior to the issuance of grading permits for each planning area of the project, the project applicant or its designee shall provide design-level geotechnical reports for those areas. These reports shall consider, but shall not necessarily be limited to, such factors as manufactured slope stability (if applicable), compressible soils, corrosive soils, and the engineering and construction of occupied or inhabited structures. The findings and recommendations contained in these reports shall be implemented. As necessary, the City may require additional studies and/or engineering protocols to meet its requirements. This measure shall be implemented to the satisfaction of the City Development Services Director.	Project Applicant	City of Rialto Public Works Department, Engineering and Traffic Division	Submittal and approval of design level geotechnical report, as applicable, and incorporation of the requirements of such reports into grading and building plans	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: GS-2: Prior to the issuance of building permits for each planning area of the project, the project applicant or its designee shall demonstrate that all occupied or inhabited structures will be able to withstand a horizontal seismic acceleration of 0.96g. Specific design-level geotechnical reports shall be prepared by a State of California Certified Engineering Geologist for planning areas within the Specific Plan to determine that structures within those areas meet required design criteria. This measure shall be implemented to the satisfaction of the City Development Services Director.	Project Applicant	City of Rialto Public Works Department, Engineering and Traffic Division	Evidence of compliance with this mitigation measure based on design criteria contained in applicable geotechnical	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: GS-3: Prior to the issuance of building permits for each planning area, the project applicant or its designee shall demonstrate that all occupied or inhabited structures will be constructed to the	Project Applicant/ Construction Contractor	City of Rialto Development Services Department,	Written evidence of compliance with and incorporation of applicable	☒ 2010 RSP ☐ RSP Amendment	Initials: _____ Date: _____ Initials: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
standards outlined in the Uniform Building Code, the California Building Code, the design-level geotechnical reports, and/or other such standard as identified and required by the City. This measure shall be implemented to the satisfaction of the City Development Services Director.		Building Division (building construction).	standards and criteria in building plans.	☐ Renaissance Marketplace ☐ PA 108	Date: _____
From 2010 EIR: GS-4: uring construction and excavation activities on the project site, all temporary slopes (i.e., excavations and trenching) shall be adequately shored and/or flattened to a shallower gradient to lessen the possibility of failure. All Cal-OSHA regulations shall be implemented for excavations that will be entered by people. All excavations will be open only as long as is necessary and shall be backfilled immediately upon completion of work. This measure shall be implemented to the satisfaction of the City Development Services Director.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Site Inspection	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: GS-5: Prior to the issuance of grading permits, the project applicant or its designee shall present an Erosion Control Plan (ECP) designed to lessen the impacts of erosion during construction. This plan shall comply with all applicable grading codes and water quality protection protocols. This plan shall be implemented during site construction. This measure shall be implemented to the satisfaction of the City Development Services Director.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Preparation of Erosion Control Plan	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: GS-6: During grading and development of the project site, all oversized material (larger than 12 inches in largest dimension) shall be handled as recommended in the project geotechnical reports. This material may be placed in deeper fills, nonstructural areas, or disposed of offsite. This measure shall be implemented to the satisfaction of the City Development Services Director.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Inclusion of notes on grading plan. Direct observation	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
HAZARDS AND HAZARDOUS MATERIALS					
From 2010 EIR: HAZ-1 Remediation of Contaminated Soils: The remediation of soils containing Chemicals of Concern (COCs) at concentrations exceeding the residential or industrial screening level shall meet the Cleanup Plan Removal Goals for Soils as depicted in Table 4.7-4 of the 2010 DEIR. This measure shall be implemented to the satisfaction of the Development Services Director. HAZ-1(a) Excavation and Stockpiling Management: The excavated materials will be segregated based upon type (e.g. tarmac, pavement, and soil) and will be temporarily stockpiled onsite for loading, transport and disposal to an offsite facility, or onsite management, as provided under the Cleanup Plan. Soil excavated will be placed in separate stockpiles based on the COC present in soil. For instance, soil containing PAHs shall be placed in a separate stockpile from soil containing TRPH and PCBs. The exception to this procedure will be in the case when soil excavated contains multiple constituents (e.g. PAHs/TRPH). In this case, soil containing multiple constituents shall be segregated accordingly based on the constituents present in soil (e.g. soil containing PAHs/TRPH shall be placed in a separate stockpile from soil containing TRPH/PCBs). The excavated soils may be further segregated based on field observation, and field monitoring results. All potentially contaminated soils excavated will be hauled offsite for disposal or relocated and contained onsite. HAZ-1(b) Offsite Disposal of Excavated Soil: All excavated soils to be exported offsite will be transported to an appropriately permitted licensed treatment, storage, and disposal facility (TSDF) for disposal. Potential disposal facilities include TRS (located in Azusa, California) TPS Technologies (located in Adelanto, California) or Western Environmental (located in Mecca, California. All transportation activities will be performed in strict compliance with regulations and ordinances. The hauling contractor(s) used to transport contaminated soils will be fully licensed and permitted by the U.S. Environmental Protection Agency (USEPA) and the State of California. All Department of Transportation (DOT) and California Highway Patrol (CHP) safety regulations will be strictly followed.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Compliance with the goals, requirements and procedures of the Clean Up Plan, including the transportation and disposal of contaminated soils	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
Transportation equipment will be chosen to safely transport the expected volumes of soil, taking into consideration the types of roads to be traveled and their loading capacity. Routine truck maintenance and repairs will be performed at the remediation contractor's premises prior to picking up loads of waste from the Site. The remediation contractor will be required to clean up, to the satisfaction of the regulatory agencies involved, any spills resulting from maintenance of the trucks due to road accidents during operation of this project. All vehicles, trailers, and containers of the subcontractors will be inspected by CRWQCB and/or San Bernardino County and contractor personnel on a routine basis. Trucks will use only pre-planned and authorized routes, as approved by the City of Rialto, California. A detailed log of the loads hauled from the Site will be maintained in the Site field logbook. The log will include, at a minimum, the date and time trucks were loaded and off-loaded, the destination, size (volume and weight) of the load, description of the contents, name and signature of the hauler, and name and signature of the Contractor's representative. The waste will be off-loaded for disposal in a manner consistent with current Federal EPA, State, and local regulations. Trucks for the offsite transportation of contaminated soil will remain on clean areas at all times to minimize the need to decontaminate the truck tires. During loading, dust, and odor emissions will be monitored and mitigated as necessary according to discussions earlier in this section. The hauling trucks will be equipped to fully cover all soils during transportation. At a minimum, the soils will be tightly covered by a heavy tarp. Trucks hauling soils will be developed prior to the initiation of remedial efforts. HAZ-1(c) Onsite Relocation of Excavated Soil: All excavated soil to be relocated onsite, with the exception of soils affected by TPH-g at concentrations in excess of Cleanup Goals may be placed beneath publicly-owned streets, from edge of curb to edge of curb within in public right of way, Figure 20. The relocation cells will be sized and excavated based on the estimated quantities of the removal areas. Further, individual relocation cells will be completed to accommodate soil based on the COC present in the soil stockpile. For instance, soil containing PAHs will be placed in a dedicated relocation cell designed to contain soils contaminated with PAHs. In the case when soil is contaminated with multiple constituents (e.g. PAHs/TRPH), these soils shall be placed in a dedicated relocation cell designed to contain these types of soils (e.g. soil containing PAHs/TRPH shall be placed in a relocation cell					

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
separate from soil containing TRPH/PCBs). The soil excavated during construction of the relocation cells will be temporarily stockpiled onsite for subsequent reuse and for cover of the relocation cell. Upon excavation, the soil from the relocation cells will be transported to a staging area for stockpiling and subsequent sampling and analysis. The location(s) for the proposed relocation cell(s) will be constructed using appropriate excavation techniques, such as sloping the excavation sidewalls at a 45-degree angle or benching to ensure slope stability is maintained and the trenching is conducted in accordance with Cal-OSHA regulations regarding trenches. Land-use restrictions will be applied to the areas of the roadways which include the relocation cells. Impacted soil will be placed in the cells at a minimum of 2 feet below the lowest utility main, which is estimated to be between 7 and 10 feet bgs, and clean backfill will be placed between the ground surface and the top of the remediation cell. Backfill and compaction will be conducted appropriately. The placement of clean backfill above the relocation cell allows for the installation and maintenance of the proposed subgrade utility alignments within the area of the relocation cells without disturbing the relocated affected soil. The proposed utilities to be installed include storm drain, sanitary sewer, joint trench (i.e., electrical, telephone, cable), and water. A typical relocation cell cross section is shown on Figure 20. The final site of the relocation cell(s) is subject to revision upon the written approval of CRWQCB staff. The engineered design and specifications of the relocation cell(s) will be determined through discussions with the RDA. The engineered design and specifications will be provided to CRWQCB staff for approval. A geotextile fabric will be placed over the top of the affected soil to mark the interface between the clean backfill soil and the relocated affected soil. The geotextile will be extended along the edges of the right of way. The soil above the relocation cell(s) will be capped with road base material following placement and compaction of the clean backfill material. Asphaltic concrete pavement, curbs and gutters will be constructed during redevelopment of the Site. Placing the soil beneath publicly-owned city streets, separate from the rest of the development project, will allow unrestricted use of the unaffected portions of the development, which will be separately parceled.					

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
HAZ-1(d) Excavation of Tarmac and Base Aggregate Material: The tarmac and base material down to native soil on Property C will be removed and the exposed native soil surface will be examined for discoloration and observation of chemical odor originating from the surface/subsurface. Areas exhibiting staining or a chemical odor will be included as part of the confirmation sampling program. It is intended that the tarmac paving be recycled and used in asphalt or as fill material onsite or offsite as part of a value engineering program. The tarmac could also be used onsite as aggregate base beneath streets and parking lots. Alternatives for onsite reuse of the aggregate material include the construction of landscape berm(s), placement of such material in below grade pits in dedicated areas of the Site that will be used as parkways, parks, and landscaping will also be an option. Implementation of these alternatives will control any potential exposure for future receptors, and will require a land-use restriction, including: (1) excluding use of the subject area for residential, hospital, schools or day care facility use; (2) requiring Regional Board notification prior to disturbance of such relocated tarmac or aggregate base materials.					
From 2010 EIR: **HAZ-2 Confirmation Sampling and Analysis:** Confirmation sampling shall be collected following excavation activities and prior to backfilling as described in the Confirmation Sampling and Analysis Plan. All sampling activities shall be conducted in accordance with the approved Field Sampling Plan (FSP) prepared by the primary contractor. This measure shall be implemented to the satisfaction of the Development Services Director.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Compliance with Confirmation Sampling and Analysis Plan and the Field Sampling Plan. Direct observations / site inspections.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: **HAZ-3 Contingency Plan for Further Remedial Action:** To minimize the potential for exposure of construction personnel to unknown contaminated soil during excavation and grading activities, prior to initiating construction or soil disturbance activities and to address the contingency of the discovery of unknown hazardous materials, a Site Management Plan (SMP) will be developed and provided to construction contractors that summarizes applicable legal requirements regarding the discovery, reporting, management, and disposal of hazardous materials or	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Preparation of and compliance with a Site Management Plan.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
hazardous wastes. Contractors will also be obligated to comply with applicable legal requirements. The SMP shall be prepared and implemented by a qualified environmental firm that has a registered civil engineer, a registered geologist, or a registered environmental assessor on their staff, and shall be subject to review and approval by the County of San Bernardino. As a component of the SMP, a contingency plan shall be prepared that shall identify parameters and physical observations that indicate potential hazardous materials contamination, including soil discoloration, suspicious odors, presence of underground storage tanks, or buried building material, including asbestos containing material. This contingency plan shall include measures to protect worker safety if signs of contamination are encountered, identify sampling and analysis protocols for various substances that might be encountered (e.g., volatile organic compounds, petroleum hydrocarbons, heavy metals, asbestos), and list required regulatory agency contacts if contamination is found. Such worker safety measures may include use of personal environmental protection equipment, 40 hour HAZWOPER training, and use of real time monitoring devices. The SMP document shall specify procedures for sampling and profiling of soils, consistent regulatory requirements, prior to transport and disposal, and procedures for groundwater waste management.					
From 2010 EIR: **HAZ-4 Groundwater Use**: The drilling of new wells or the use of existing wells shall be prohibited within the Specific Plan area, except for those purposes that will not harm the public or create environmental impacts related to perchlorate contamination. This measure shall be implemented to the satisfaction of the Public Works Director/City Engineer.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Evaluation of proposals to drill new wells or use existing wells.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
From 2010 EIR: HAZ-5 Hazards Associated with Illegal Fenceline Dumping at the Site's Western Edge: Materials from the western portion of the Site will be removed and observed for evidence of recognized environmental conditions. If such conditions are identified, sampling will be performed to confirm the absence (or presence) of contaminants in soil to determine if further action is required. Any remedial actions necessary will be undertake consistent with contingency plans as identified under mitigation measure HAZ-3 of this section.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Evidence of materials removal and (as necessary) sampling.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: HAZ-6 Underground Pipeline: Any development located immediately adjacent to the existing easement for the underground gas pipeline will require coordination between the contractors and the easement holder to establish a monitoring program.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Evidence of establishment of monitoring program.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: HAZ-7 Pre-Demolition Activities: Prior to approval of demolition by the Development Services Department, an asbestos survey will be conducted prior to demolition of applicable structures pursuant to state and federal law. All asbestos containing building materials will be removed prior to structure demolition. This work will be performed by an abatement contractor who is certified by the California OSHA Division of Occupational Safety and Health (DOSH) with properly trained and registered workers. All abatement techniques will be in accordance with DOSH and EPA protocol and also in conformance with South Coast Air Quality Management District rules. All removed asbestos containing building materials will be properly disposed of at a landfill certified to accept asbestos waste and waste will be transported under the waste manifest by a certified waste transportation company. Once all of these materials have been removed, structure demolition will commence. A lead based paint survey will be conducted under applicable state and federal. Abatement or paint stabilization techniques will be applied consistent with state and federal law will be applied prior to demolition. Such measures will include removal and stabilization of	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Preparation of asbestos and lead based paint surveys.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
loose, flaking or peeling paint. Measures will be taken to ensure that paint chips are not generated in the demolition process. Once peeling paint has been removed and remaining paint surfaces have been stabilized demolition can commence. Lead paint having concentrations of 0.1 percent or more will be disposed of as hazardous if the composite samples exceed this level. Composite samples of the demolition waste should be collected and analyzed for lead content by TTLC, then Cal WET, and finally TCLP methods to characterize it for disposal. All removal and stabilization will be conducted by certified lead abatement contractors. Workers addressing lead paint condition will be subject to monitoring, personal protective equipment and control measures while abatement and demolition is being done to ensure that workers are not being exposed above regulatory Permissible Exposure Limits (PEL).					
From 2010 EIR: **HAZ-8 Underground Storage Tank Removal:** UST will be permanently closed in accordance with the San Bernardino County requirements. USTs will be purged, cleaned, and excavated. All above and below ground UST appurtenances such as dispensers will be removed and disconnected from vents or other above and below ground piping, including all other underground utilities associated with the buried UST. Prior to tank removal, preparation activities will be performed by purging and cleaning the USTs. The tanks will then be removed by exposing (excavating) soils over and around the USTs, lifting the USTs from the excavation, sampling the excavation, further excavation as required to meet applicable regulatory thresholds, and backfilling the excavation with clean certified soil. The USTs and appurtenances will be transported as hazardous waste, accompanied by a California Hazardous Waste Manifest and taken to a licensed Treatment, Storage, and Disposal Facility (TSDF). USTs may only be handled as non-hazardous if they are triple rinsed onsite and the rinsate is manifested and hauled to a licensed TSDF. Soil samples will be collected per the San Bernardino County UST removal procedures. A minimum of one (1) sample will be collected from the fill end, and one (1) sample from the turbine end of the	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Written evidence of completion of removal and soil sampling/ remediate as described.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
UST. Samples will also be collected at least 2 feet below native soil and a separate sample will be collected at each dispenser, and at every 20 linear feet of piping and/or at each joint, bend or connection. Soil samples will be collected from the soil stockpiled from the excavation. Soil samples will be submitted to a State of California, Department of Health Services certified Laboratory for chemical analysis of all constituents of the previously stored hazardous substances and their breakdown or transformation products.					
HAZ-9 Pole-Mounted Transformers: Prior to grading of the Site, the existing transformers will be inspected to determine whether or not they contain PCBs. If PCBs are present, the transformers will be replaced with newer models that do not contain PCBs. The old transformers will be disposed of through a commercially permitted PCB disposal company, as identified by the U.S. Environmental Protection Agency.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Written evidence of inspection and, if necessary, replacement of transformers.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: HAZ-10 Schools: Any school proposed as part of the redevelopment of the Project site will be subject to the oversight of the California Department of Toxic Substances Control, as required by State law. Any school site will be free of contamination or, if the properties were previously contaminated, they will be cleaned up under DTSC's oversight to a level that protects the students and staff who will occupy the new school.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction).	Written evidence of absence of contamination, or evidence of clean up subject to DTSC oversight.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
HYDROLOGY AND WATER QUALITY					
From 2016 SEIR: HYD-1: Prior to issuance of grading permits, the developers or their designees shall coordinate the design and obtain approval of all flood control and storm drain structures as identified in the Renaissance Specific Plan Storm Drainage Plan. The developers or their designees shall provide evidence of this approval to the City Public Works Department. These improvements shall be consistent with any master planning efforts of the County to the satisfaction of the City Engineer.	Project Applicant	City of Rialto Public Works Department, Engineering and Traffic Division	Review and approval of design of flood control and storm drain structures. Evidence of County approval	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
Note: This mitigation measure satisfies mitigation measure HYD-1 from the 2010 EIR.					
From 2016 SEIR: **HYD-2:** The developers or their designees shall obtain a General Permit for Stormwater Discharge Associated with Construction Activity (Construction Activity General Permit). The developers or their designees shall provide a copy of this permit to the City Public Works Department prior to the issuance of grading permits. Note: This mitigation measure satisfies mitigation measure HYD-2 from the 2010 EIR.	Project Applicant	City of Rialto Public Works Department, Engineering and Traffic Division	Provide a copy of permit.	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: **HYD-3:** Prior to the issuance of grading permits, the developers or their designees shall prepare a WQMP and an Erosion and Sediment Control Plan (ESCP) to implement the most appropriate BMPs and to prevent any significant removal and/or downstream deposition of soil from the Project area during construction. The WQMP and ESCP shall contain provisions requiring that all erosion control measures and structures be maintained and repaired as needed for the life of the Project. Prior to the issuance of a grading permit, the Public Works Department shall approve the WQMP and ESCP based on review and input by the RWQCB. At the request of the developer, the City Public Works Department may accept a Stormwater Pollution Prevention Plan (SWPPP) as a substitute for the ESCP as long as it fulfills the intent of this measure to an equivalent degree. The SWPPP or ESCP shall be prepared to the satisfaction of the City Public Works Department. The WQMP and ESCP or SWPPP shall include, but is not limited to, the following: a) Specify the timing of grading and construction to minimize soil exposure to winter rain periods experienced in southern California; Specify the timing of grading and construction to minimize soil exposure to winter rain periods experienced in southern California; b) Natural vegetation shall be retained on all areas that will not be disturbed for grading, except areas that must be cleared and revegetated as part of a fuel modification program; c) All slopes greater than five feet in height shall be evaluated to define the optimum length and steepness to minimize flow	Project Applicant	City of Rialto Public Works Department, Engineering and Traffic Division	Review and approval of WQMP and ESCP (or SWPPP as applicable).	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
velocity and erosion potential. Lateral drainage collection systems shall be incorporated at the base of slopes, when determined appropriate, to transport flows in a controlled, non-erodible channel; d) Indicate where flows on the site can be diverted from denuded areas and carried in the natural channels on the site; e) Construct man-made channels to minimize runoff velocities; f) Disturbed areas shall be vegetated and mulched immediately after final grades have been established; g) Sediment traps, basins, or barriers (silt fences, hay bales, etc.) shall be established on the property to prevent the release of "first flush" urban pollutants, including sediment, from developed areas, including the emergency access roads. The design and location of these improvements shall be identified in the plan subject to review and approval by the City; h) Drainage facilities designed to transport flows shall be described and the adequacy of the channel shall be verified by City approval of a detailed drainage analysis; i) An inspection and maintenance program shall be included to ensure that any erosion, which does not occur either on or offsite as a result of the Project, will be corrected through a remediation or restoration program within a time frame specified by the City; j) Confirmed observations by the City of uncontrolled runoff being carried onsite will be grounds for suspension of revocation of any grading or building permit in process, or any discretionary permit subsequently applied for until the problem is resolved to the satisfaction of the City Public Works Department. Note: This mitigation measure satisfies mitigation measure HYD-3 from the 2010 EIR.					
From 2016 SEIR: **HYD-4:** Prior to the issuance of grading building permits, graded but undeveloped land shall be maintained in a relatively weed-free condition and/or planted with interim landscaping unless building permits are obtained within 180 days of completion of grading. This measure shall be implemented to the satisfaction of the Development Services Director.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction)	Direct observation	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
Note: This mitigation measure satisfies mitigation measure HYD-4 from the 2010 EIR.					
From 2016 SEIR: HYD-5: Prior to the issuance of grading permits, the applicant shall demonstrate that the development's Erosion Control Plans comply with the Statewide General Construction Permit to the satisfaction of the City Engineer and/or Public Works Director as applicable.Note: This mitigation measure satisfies mitigation measure HYD-5 from the 2010 EIR.	Project Applicant/ Construction Contractor	City of Rialto Public Works Department, Engineering and Traffic Division	Site inspection	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: HYD-6 : Prior to issuance of the first occupancy permit, the developers or their designees shall provide proof to the Public Works Department that the onsite drainage facilities will be maintained by the County, City, HOA, or equivalent. The developer must demonstrate that these facilities will be adequately maintained by an appropriate mechanism or organization, to the satisfaction of the City Public Works Department. Note: This mitigation measure satisfies mitigation measure HYD-6 from the 2010 EIR.	Project Applicant/ Construction Contractor	City of Rialto Public Works Department, Engineering and Traffic Division	Written evidence identifying maintenance entity	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
NOISE					
From 2016 SEIR: N-1: Construction activities shall be limited to the City's allowable hours of construction activities as shown in Table 4.11-2 of the 2010 DEIR, in accordance with the City's Noise Ordinance. Note: This mitigation measure satisfies mitigation measure N-01 from the 2010 EIR. Note: This mitigation measure satisfies mitigation measure N-01 from the 2010 EIR.te: This mitigation measure satisfies mitigation measure N-01 from the 2010 EIR.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction)	Direct observations, site inspections.	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: N-2: All construction equipment shall use noise-reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer. Note: This mitigation measure satisfies mitigation measure N-02 from the 2010 EIR.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction)	Direct observations, site inspections.	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
From 2016 SEIR: **N-3:** Construction staging and heavy equipment maintenance activities shall be performed a minimum distance of 300 feet from any nearby noise sensitive uses, unless safety or technical factors take precedence, subject to City approval. Note: This mitigation measure satisfies mitigation measure N-03 from the 2010 EIR.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction)	Incorporation of requirement into grading and building plans (plan notes). Site inspection.	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: **N-4:** Stationary combustion equipment such as pumps or generators operating within 300 feet of any nearby noise sensitive uses shall be shielded with a noise protection barrier. Note: This mitigation measure satisfies mitigation measure N-04 from the 2010 EIR.	Project Applicant/ Construction Contractor	City of Rialto Development Services Department, Building Division (building construction)	Incorporation of requirement into grading and building plans (plan notes). Site inspection.	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: **N-5:** Stationary combustion equipment such as pumps or generators operating within 300 feet of any nearby noise sensitive uses shall be shielded with a noise protection barrier. Note: This mitigation measure satisfies mitigation measure N-05 from the 2010 EIR.	Project Applicant	City of Rialto Development Services Department, Planning Division	Review and approval of land use applications, review and approval of analyses as specified	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: **N-6:** The City shall require that a noise impact analysis be prepared for all proposed residential subdivisions within the Specific Plan, and proposed commercial retail or business uses located adjacent to Alder Avenue, Baseline Road, SR-210, or adjacent to other sensitive on-site or off-site uses. Each noise impact analysis shall identify potential direct, project-related, transportation noise impacts and provide mitigation, if necessary, to reduce the traffic noise impacts as well as other onsite stationary noise impacts to within the City noise level standards of the Land Use Element of the Rialto General Plan (shown in Table 4.11-1 in the 2010 DEIR). Note: This mitigation measure satisfies mitigation measure N-06 from the 2010 EIR.	Project Applicant	City of Rialto Development Services Department, Planning Division	Review and approval of land use applications, submittal and review of noise analyses as specified	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
From 2016 SEIR: **N-7:** The City shall require that a noise impact analysis be prepared for all proposed residential subdivisions within the Specific Plan, and proposed commercial retail or business uses located adjacent to Alder Avenue, Baseline Road, SR-210, or adjacent to other sensitive on-site or off-site uses. Each noise impact analysis shall identify potential direct, project-related, transportation noise impacts and provide mitigation, if necessary, to reduce the traffic noise impacts as well as other onsite stationary noise impacts to within the City noise level standards of the Land Use Element of the Rialto General Plan (shown in Table 4.11-1 in the 2010 DEIR). Note: This mitigation measure satisfies mitigation measure N-07 from the 2010 EIR.	Project Applicant	City of Rialto Development Services Department, Planning Division	Review and approval of land use applications, submittal and review of noise analyses as specified	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: **N-8:** The City shall require that a vibration impact analysis be prepared for any commercial or business developments located adjacent to existing or proposed vibration sensitive land uses. Each vibration analysis shall identify potential sources of vibration impacts and provide mitigation, if necessary, to reduce the vibration impacts to within the County standards. Note: This mitigation measure satisfies mitigation measure N-08 from the 2010 EIR.	Project Applicant	City of Rialto Development Services Department, Planning Division	Review of land use applications. Submittal and review of noise analyses/ mitigation as necessary.	☒ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: **Traffic Noise Impacts.** The following mitigation measures are required for traffic noise impacts: **Mitigation Measure NOI-4:** Prior to Certificate of Occupancy or City acceptance of the Public Parks (as applicable), the applicant shall demonstrate that required sound barriers have been constructed for the following Planning Areas: 1. For the school (Sub-Area 123) and public park (Sub-Area 126) along Ayala Drive with outdoor active use areas within 184 feet of the Ayala Drive centerline, sound walls with a minimum height of 6 feet are required along the Project boundary along Ayala Drive or along the perimeter of the active use areas that are directly exposed to traffic on Ayala Drive. The Development Services Director/Planning Division may also allow the	Project Applicant	City of Rialto Development Services Department, Planning Division	Review of land use applications. Submittal and review of noise analyses/ mitigation as necessary.	☐ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
applicant to prepare a site-specific noise study that demonstrates noise walls are not needed.					
2. For residential uses proposed in Sub-Area 115 with outdoor living areas (e.g., patios and balconies/decks) or recreational areas (e.g., barbecue area or children's playground) within 184 feet of the Ayala Drive centerline, a sound wall with a minimum height of 6 feet should be constructed along the project boundary along Ayala Drive or along the perimeter of the outdoor living/recreational areas that are directly exposed to traffic on Ayala Drive. Higher walls may be necessary if these outdoor living/recreational areas are proposed within 86 feet (70 dBA CNEL) of the centerline of Ayala Drive. The Development Services Director/Planning Division may also allow the applicant to prepare a site-specific noise study that demonstrates noise walls are not needed.					
3. For the public park (Sub-Area 126) along Linden Avenue with outdoor active use areas proposed within 86 feet of the Linden Avenue centerline, sound walls with a minimum height of 6 feet are recommended along the Project boundary along Linden Avenue or along the perimeter of the active use areas that are directly exposed to traffic on Linden Avenue. The Development Services Director/Planning Division may also allow the applicant to prepare a site-specific noise study that demonstrates noise walls are not needed.					
4. For residential uses proposed in Sub-Areas 110, 116, and 113 with outdoor living areas (e.g., backyards/patios and balconies/decks) or recreational areas (e.g., barbecue area or children's playground) within 95 feet of the Linden Avenue centerline, prior to the occupancy of the residential units, outdoor living/recreational areas should be protected with a sound wall with a minimum height of 6 feet. The Development Services Director/Planning Division may also allow the applicant to prepare a site-specific noise study that demonstrates noise walls are not needed.					

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
TRANSPORTATION AND CIRCULATION					
From 2010 EIR: **T-1 Intersection Improvements:** The City shall ensure that RSP generated traffic will not result in inadequate Level of Service (LOS) for RSP project intersections. Prior to any discretionary approval of development pursuant to the RSP, the City Traffic Engineer shall use the Traffic Impact Analysis (TIA - LSA 2009) to evaluate which portion of the above-listed improvements are attributable to the proposed development, and appropriate based upon the progress of cumulative development. Based upon this evaluation, the proposed development shall be required, to either, a) construct the applicable improvements; or b) pay appropriate fair-share fees for the development's contribution to a cumulative impact, as determined necessary to meet acceptable levels of service pursuant to the applicable jurisdiction.	Project Applicant	City of Rialto Development Services Department, Planning Division and Department of Public Works, Engineering and Traffic Division	Evaluation of development proposals. Evidence of enforceable requirements to provide monetary contributions and/or improvements as necessary to maintain acceptable LOS.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: **TRANS-1**: Prior to the issuance of grading permits, the City Traffic Engineer shall review individual site-specific development proposals to evaluate whether such proposals would cause LOS failure at Project intersections. If it is determined that traffic generated from such proposal would cause LOS failure, the applicant shall provide, either through construction of and/or monetary contribution for, improvements listed in Table 4.7-20, Table 4.7-21, and Table 4.7-22 of the Recirculated Draft SEIR. Such improvements and/or monetary contribution shall be provided in proportion to an individual project's impacts on traffic and to the satisfaction of the City Traffic Engineer.	Project Applicant	City of Rialto Development Services Department, Planning Division and Department of Public Works, Engineering and Traffic Division	Evaluation of development proposals. Evidence of enforceable requirements to provide monetary contributions and/or improvements as necessary to maintain acceptable LOS.	☐ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	
From 2016 SEIR: **TRANS-2**: Prior to issuance of building permits, the Renaissance Marketplace project applicant shall enter into a Development Agreement (DA) with the City of Rialto. This DA shall describe the timing and implementation of project-specific improvements, as well as existing funding mechanisms and proportional fair-share contributions, for the improvements listed in Table 4.7-23, Table 4.7-24, Table 4.7-25, and Table 4.7-26 of the Recirculated Draft SEIR. Where no existing funding mechanism exists for	Project Applicant	City of Rialto Development Services Department, Planning Division and Department of Public Works, Engineering	Evaluation of development proposals. Evidence of enforceable requirements to provide monetary contributions and/or	☐ 2010 RSP ☐ RSP Amendment ☒ Renaissance Marketplace ☐ PA 108	

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Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
recommended improvements, the DA shall stipulate that the applicant shall pay not less than the fair share contribution to mitigate project impacts.		and Traffic Division	improvements as necessary to maintain acceptable LOS.		
From 2016 SEIR: **TRANS-3:** Prior to issuance of building permits, the Planning Area 108 (PA 108) applicant shall enter into a Development Agreement (DA) with the City of Rialto. This DA shall describe the timing and implementation of project-specific improvements, as well as existing funding mechanisms and proportional fair-share contributions, for the improvements listed in Table 4.7.27, Table 4.7-28, Table 4.7-29, and Table 4.7-30 of the Recirculated Draft SEIR. Where no existing funding mechanism exists for recommended improvements, the DA shall stipulate that the applicant shall pay not less than the fair share contribution to mitigate project impacts.	Project Applicant	City of Rialto Development Services Department, Planning Division and Department of Public Works, Engineering and Traffic Division	Evaluation of development proposals. Evidence of enforceable requirements to provide monetary contributions and/or improvements as necessary to maintain acceptable LOS.	☐ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☒ PA 108	
CLIMATE CHANGE					
From 2010 EIR: **CC-01:** Homes and businesses will exceed the 2008 Standards for Title 24 Part 6 energy efficiency standards by at least 10 percent.	Project Applicant	City of Rialto Development Services Department, Building Division	Incorporation of standards into building plans.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: **CC-02:** Where appliances are offered by homebuilders, Energy Star appliances will be installed.	Project Applicant	City of Rialto Development Services Department, Building Division	Incorporation of requirement into building plans.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: **CC-03:** The Proposed Project will comply with any applicable local Climate Action Plan (CAP) or mitigation program for the reduction of	Project Applicant	City of Rialto Development Services	Incorporation into conditions of approval for	☒ 2010 RSP ☐ RSP Amendment	Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
greenhouse gases (GHGs) adopted by the City of Rialto or the County of San Bernardino that is adopted prior to the issuance of building permits for subsequent project phases.		Department, Planning Division	future development proposals.	☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____
From 2010 EIR: **CC-04:** The Proposed Project shall promote the use of alternative fuel technologies for construction vehicles by including language in construction bid specifications and weighting the use of alternative fuel technologies in the selection of construction contractors.	Project Applicant	City of Rialto Development Services Department, Building Division	Written evidence of described language in construction bids.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2010 EIR: **CC-05:** Throughout construction, the Proposed Project shall maintain a centralized information repository for available recycled building materials. Recycled building materials shall be incorporated where practicable.	Project Applicant	City of Rialto Development Services Department, Building Division	Periodic review of centralized information repository.	☒ 2010 RSP ☐ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____
From 2016 SEIR: **GHG-1: Project Design Features** Prior to issuance of a building permit, the project applicant must submit to the satisfaction of the Development Services Director/Planning Division, evidence that the proposed Renaissance Marketplace and Planning Area 108 projects comply with and would not conflict with or impede the implementation of reduction goals identified in Assembly Bill (AB) 32, the Governor's Executive Order (EO) S-3-05, and other strategies to help reduce greenhouse gases (GHGs) to the level proposed by the Governor. The Renaissance Marketplace and Planning Area 108 projects will be designed and constructed to incorporate and/or implement to the extent feasible and to the satisfaction of the City, the following measures: *Construction and Building Materials* • Use locally produced and/or manufactured building materials for at least 10 percent of the construction materials used for the Projects.	Project Applicant	City of Rialto Development Services Department, Building Division	Incorporation of requirement into building plans	☐ 2010 RSP ☐ RSP Amendment ☒ Renaissance Marketplace ☒ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
• Recycle/reuse at least 50 percent of the demolished and/or grubbed construction materials (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard) if feasible.					
• Use "Green Building Materials," such as those materials that are resource-efficient and are recycled and manufactured in an environmentally friendly way, for at least 10 percent of the Projects.					
Energy Efficiency Measures					
• Design all project buildings to meet or exceed the California Building Code's (CBC) Title 24 energy standard, including, but not limited to, any combination of the following:					
○ Increase insulation such that heat transfer and thermal bridging is minimized;					
○ Limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption; and					
○ Incorporate ENERGY STAR or better rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment.					
• Install efficient lighting and lighting control systems. Use daylight as an integral part of the lighting systems in buildings.					
• Install "cool" roofs and cool pavements.					
• Install energy-efficient heating and cooling systems, appliances and equipment, and control systems.					
• Install solar lights or light-emitting diodes (LEDs) for outdoor lighting or outdoor lighting that meets the City of Rialto City Code.					
• Install solar photovoltaic or other technology to generate electricity on-site to reduce consumption from the electrical grid.					
• Install electrical vehicle charging stations to promote the use of electrical vehicles.					
• Promote and incentivize solar installations on new warehouse space through partnerships with SCE and other private sector funding sources including Sungevity, SolarCity, and other solar lease or PPA companies. Establish a goal that a percentage of new warehousing projects install solar to provide a minimum of					

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
25 percent of the project's new on-site energy needs and that all existing warehousing install solar to provide a minimum of 25 percent of power needs with solar. This goal could be supported through nonfinancial incentives or streamlined permitting. Cities may also act as a resource for connecting project proponents with funding opportunities.					
Water Conservation and Efficiency Measures					
• Devise a comprehensive water conservation strategy appropriate for the Project and its location. The strategy may include the following, plus other innovative measures that may be appropriate:					
○ Create water-efficient landscapes within the development.					
○ Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.					
○ Use reclaimed water, if available, for landscape irrigation within the Project. Install the infrastructure to deliver and use reclaimed water, if available.					
○ Design buildings to be water-efficient. Install water-efficient fixtures and appliances, including low-flow faucets and waterless urinals.					
○ Restrict watering methods (e.g., prohibit systems that apply water to nonvegetated surfaces) and control runoff.					
Solid Waste Measures					
• To facilitate and encourage recycling to reduce landfill-associated emissions, among others, the Projects will provide trash enclosures that include additional enclosed area(s) for collection of recyclable materials. The recycling collection area(s) will be located within, near, or adjacent to each trash and rubbish disposal area. The recycling collection area will be a minimum of 50 percent of the area provided for the trash/ rubbish enclosure(s) or as approved by the waste management vendor for the City of Rialto.					
• Provide employee education on waste reduction and available recycling services.					
Transportation Measures					
• To facilitate and encourage nonmotorized transportation, bicycle racks shall be provided in convenient locations to facilitate bicycle access to the Project area. The bicycle racks shall be shown on building plans submitted for Planning					

Mitigation Monitoring and Reporting Program Table Cont.

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring/ Reporting Action	Mitigation Required When Implementing:	Monitoring Compliance Record (Name/Date)
Department approval and shall be installed in accordance with those plans. • Provide pedestrian walkway and connectivity requirements. All new non-residential and multifamily developments of ten or more units shall be designed to incorporate the transportation control measures (TCM) described in Chapter 18.59 of the City of Rialto Municipal Code.					
UTILITIES AND SERVICE SYSTEMS					
From 2016 SEIR: Implementation of Mitigation Measure HYD-1. HYD-1: Prior to issuance of grading permits, the developers or their designees shall coordinate the design and obtain approval of all flood control and storm drain structures as identified in the Renaissance Specific Plan Storm Drainage Plan. The developers or their designees shall provide evidence of this approval to the City Public Works Department. These improvements shall be consistent with any master planning efforts of the County to the satisfaction of the City Engineer.	Project Applicant	City of Rialto Developmen t Services Department, Planning Division and Department of Public Works, Engineering and Traffic Division	Provide a copy of permit.	☐ 2010 RSP ☒ RSP Amendment ☐ Renaissance Marketplace ☐ PA 108	Initials: _____ Date: _____ Initials: _____ Date: _____