

**FINAL SUPPLEMENTAL  
Environmental Impact Report No. 534  
San Gorgonio Crossing  
Riverside County, California  
State Clearinghouse Number: 2014011009**

Prepared for:



**County of Riverside**

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Date: March 6, 2020

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## SECTION 1: INTRODUCTION

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088, the County of Riverside (Lead Agency) has evaluated the comments received on the San Gorgonio Crossing Draft Supplemental Environmental Impact Report (Draft SEIR). Pursuant to CEQA Guidelines Section 15132, this Final SEIR includes a list of persons, organizations, and agencies that provided comments on the Draft SEIR; responses to the comments received regarding the Draft SEIR; and errata, or revisions to the Draft SEIR; as well as a Mitigation Monitoring and Reporting Program (MMRP) for use by the County of Riverside during its review. This document is organized into three sections:

- **Section 1—Introduction.** Provides an introduction to the Final SEIR.
- **Section 2—Responses to Comments.** Provides a list of the agencies, organizations, and individuals who commented on the Draft SEIR. Copies of all of the letters received regarding the Draft SEIR and responses thereto are included in this section.
- **Section 3—Errata.** Includes general corrections, minor refinements, and clarifications to the Draft SEIR based on comments received from the public and agencies and other items requiring revisions. These changes are minor and do not add significant new information that would affect the analysis or conclusions provided in the Draft SEIR.

This Final SEIR constitutes the second part of the Supplemental EIR for the San Gorgonio Crossing Project and is intended to be a companion to the Draft SEIR.<sup>1</sup> The Draft SEIR, which was circulated for public review from December 16, 2019, through January 30, 2020, constitutes the first part of the SEIR and is incorporated by reference but packaged separately from the Final SEIR. The Final SEIR includes the following contents:

- Draft SEIR (provided under separate cover)
- Draft SEIR Appendices (provided under separate cover)
- Responses to Written Comments on the Draft SEIR and Errata (Sections 2 and 3 of this document)
- MMRP (provided under separate cover)

<sup>1</sup> As noted in the Draft Supplemental EIR, the Riverside County Board of Supervisors certified the Final EIR for the San Gorgonio Crossing Project (PP25337, CZ07799, PM36564, and GPA01079) on October 24, 2017. After the Final EIR was certified, two entities filed legal actions challenging the EIR, which were consolidated and heard by the Riverside Superior Court. On February 7, 2019, in the case titled *Cherry Valley Pass Acres and Neighbors and Environmental Planning Group v. the County of Riverside*, the Court ordered the Respondent County of Riverside (County) to (1) address in its Final EIR the South Coast Air Quality Management District (SCAQMD) recommendation to maximize the use of solar panels and provide an explanation as to why the mitigation measure was not adopted, and (2) include in the Final EIR a further analysis of the Project's projected transportation energy use requirements and, in particular, its overall use of efficient transportation alternatives. The Court further ordered that (1) the remainder of the Final EIR certified on October 24, 2017, is in full compliance with CEQA and remains certified, and (2) the project approvals are valid and shall remain in place. Therefore, the County prepared a Draft SEIR that (1) analyzed the South Coast Air Quality Management District (SCAQMD) recommendation to maximize the use of solar panels and provide an explanation as to why the mitigation measure was not adopted, and (2) provided further analysis of the Project's projected transportation energy use requirements and, in particular, its overall use of efficient transportation alternatives to ensure that the Projects' energy use is not inefficient, wasteful, or unnecessary in accordance with Appendix F. There are no other changes to the project or environmental circumstances that require additional environmental review under CEQA (Public Resources Code Section 21000, et seq.), State CEQA Guidelines (California Code of Regulations [CCR] Title 14 § 15000, et seq.), or the County's rules and regulations.

As demonstrated in this Final SEIR, neither the comments submitted on the Draft SEIR, the responses to these comments, nor the corrections and additions presented in Section 3 of this Final SEIR constitute new significant information warranting recirculation of the Draft SEIR as set forth in CEQA Guidelines Section 15088.5. Rather, the Draft SEIR is comprehensive and has been prepared in accordance with CEQA.

## SECTION 2: RESPONSES TO COMMENTS

### 2.1 - List of Authors

A list of public agencies, organizations, and individuals that provided comments on the San Gorgonio Crossing Project Draft Supplemental Environmental Impact Report (Draft SEIR) is presented below. Each comment has been assigned a code. Individual comments within each communication have been numbered so comments can be cross-referenced with responses. Following this list, the text of the communication is reprinted and followed by the corresponding response.

Author	Author Code
<b>State Agencies</b>	
State Clearinghouse.....	SCH
<b>Local Agencies</b>	
None .....	
<b>Organizations</b>	
Cherry Valley Pass Acres and Neighbors.....	CVAN
<b>Individuals</b>	
Judith Bingham.....	BINGHAM
Nancy Carroll .....	CARROLL
Zenaida Concepcion .....	CONCEPCION
Mary A. Daniel .....	DANIEL
Thomas G. Dean .....	DEAN
Patrick Doherty.....	DOHERTY
Faith Donavin .....	DONAVIN
Stephen Hilario .....	HILARIO
Stanley Ross .....	ROSS
Marc Sanders .....	SANDERS
Libi Uremovic .....	UREMOVIC
Geoffrey Wilson .....	WILSON
James Wright .....	WRIGHT

### 2.2 - Responses to Comments

#### 2.2.1 - Introduction

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088, the County of Riverside, as the CEQA Lead Agency, evaluated the comments received on the Draft SEIR for the San Gorgonio Crossing Project (State Clearinghouse No. 2014011009) and has prepared the following responses to the comments received. This Response to Comments document becomes

part of the Final Supplemental Environmental Impact Report (Final SEIR) for the project in accordance with CEQA Guidelines Section 15132.

### **2.2.2 - Comment Letters and Responses**

The comment letters reproduced in the following pages follow the same organization as used in the List of Authors.



Gavin Newsom  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Kate Gordon  
Director

January 30, 2020

Brett Dawson  
Riverside County  
4080 Lemon Street, 12th Floor  
Riverside, CA 92501-3634

Subject: San Geronio Crossing/Gateway Center Project  
SCH#: 2014011009

Dear Brett Dawson:

The State Clearinghouse submitted the above named SIR to selected state agencies for review. The review period closed on 1/29/2020, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act, please visit: <https://ceqanet.opr.ca.gov/2014011009/5> for full details about your project.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

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## **State Agencies**

### ***State Clearinghouse (SCH)***

#### *Response to SCH-1*

This comment acknowledges compliance with the requirements of State Clearinghouse review and documents that no State agencies submitted comments on the Draft SEIR. This comment is noted.

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**CHERRY VALLEY PASS ACRES AND NEIGHBORS  
P.O. Box 3257  
BEAUMONT, CALIFORNIA 92223**

January 29, 2020

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

*bdawson@rivco.org*

Brett Dawson  
Project Planner  
Riverside County Planning Department  
4080 Lemon Street, 12th Floor  
Riverside, CA 92501

Re: Comments on Draft Supplemental Environmental Impact Report No.  
534, San Gorgonio Crossing Project

Dear Mr. Dawson:

I am submitting these comments on the Draft Supplemental Environmental Impact Report ("SDEIR") for the San Gorgonio Crossing Project on behalf of Cherry Valley Pass Acres and Neighbors("CVAN"). Please provide me with all future notices regarding this Project.

CVAN is a California non-profit corporation comprised of more than 300 families, many of whom live and work in Cherry Valley, an unincorporated community of interest located north and east of the proposed project.

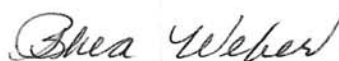
On March 6, 2019, the Riverside County Superior Court issued a Peremptory Writ of Mandate ("Writ"), ordering Riverside County ("the County") to address deficiencies in its prior Final Environmental Impact Report ("FEIR") for the referenced Project. On December 16, 2019, the County circulated the SDEIR.

Brett Dawson  
January 29, 2020  
Page 2

CVAN does not believe that the SDEIR satisfactorily addresses the deficiencies described in the Writ, and thus fails to comply with the Court's order. First, the SDEIR does not provide evidence that the proposed use of solar panels represent "the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility." (See Writ, at p. 2; Administrative Record at p. 349) Second, the SDEIR does not adequately analyze the Project's "use of efficient transportation alternatives." For example, there is no discussion of hydrogen fuel-cell vehicle technologies. Nor is there any discussion of requiring that all vehicles utilizing the Project to utilize alternative fuels (e.g., electric or hydrogen cell). Both Tesla and Cummins have introduced electric big rig engines, and Kenworth is already testing hydrogen fuel cell big rig engines in California. Given the degraded air quality in the San Geronio Pass area it is critical that these alternatives be evaluated.

Thank you for your consideration of these comments.

Very truly yours,



Rhea Weber  
President Cherry Valley Pass Acres & Neighbors

cc: Robert C. Goodman, Esq.

## Organizations

### ***Cherry Valley Pass Acres and Neighbors (CVAN)***

#### *Response to CVAN-1*

This comment asserts that the Draft SEIR did not satisfactorily address the Court's order to address the South Coast Air Quality Management District's (SCAQMD's) recommendation to maximize the use of solar panels and provide an explanation as to why the mitigation measure was not adopted.

This comment is incorrect. As described in the Draft SEIR, SCAQMD recommended that the County further reduce the project's significant operational air quality impacts from on-site area sources by "maximiz[ing] the use of solar energy including solar panels" and "installing the maximum possible number of solar energy arrays on the building roofs and/or on the project site to generate solar energy for the facility." Addressing SCAQMD's comment, the Draft SEIR requires implementation of Mitigation Measure (MM) AIR-1i to install a 1.25 megawatt (MW) DC rooftop solar energy system that is projected to offset 100 percent of the project's annual electrical consumption. This array, and the data demonstrating that the solar energy system would fully offset the project's annual electricity consumption, is shown in Appendix A, Appendix B, and Appendix D of the Draft SEIR. Implementation of MM AIR-1i will eliminate all of the project's operational air emissions associated with building energy consumption. Thus, consistent with the Court's order and SCAQMD's comment, the Draft SEIR requires mitigation to ensure that the project installs the maximum number of solar arrays to offset all of the annual electricity consumption for the facility and fully eliminate the project's operational air emissions generated by building energy consumption.

State CEQA Guidelines Section 15126.4(a)(4) requires that any mitigation measures be roughly proportional to the impacts of a project. The Draft SEIR describes that, requiring the project to incorporate solar energy, no matter how much, would neither avoid nor substantially lessen the project's significant and unavoidable operational emission impact or be roughly proportional to such impact, as only a small percentage of the project's air pollutant emissions are associated with energy use (see RDEIR Section 3.3, Air Quality, Table 3.3-15, Mitigated Regional Operational Emissions—Summer). Notwithstanding this, however, the project has committed pursuant to MM AIR-1i to maximize the use of solar panels by installing a 1.25 MW DC system that would cover approximately 220,000 square feet of the building roof area and offset an estimated 100 percent of the project's electricity consumption.

#### *Response to CVAN-2*

The comment states that the Draft SEIR does not adequately analyze the project's use of efficient transportation alternatives, including alternative fuels such as electric or hydrogen cell technology. This is incorrect. Draft SEIR Section 2.2 analyzes the project's transportation energy use requirements, including its overall use of efficient transportation alternatives consistent with the State CEQA Guidelines, and determined that transportation-related energy usage would not be wasteful, inefficient, or unnecessary.

The Draft SEIR analyzes alternative-based fuels to power the project's motor vehicles on Pages 2-11 and 2-12. Specifically, the Draft SEIR describes that there are limited alternative-fueled medium- and heavy-duty trucks in use. Moreover, the project does not legislate or control emissions standards or

technologies that trucks will use in the future, nor does it otherwise own or manage truck fleets. Thus, the project does not control the rate in which future truck technology, including alternatively fueled trucks, are adopted. However, to further support the deployment of alternative fuels, specifically zero emission technologies such as battery electric engines, the Draft SEIR requires implementation of MM ENER-1 to design the building to include infrastructure that would support the deployment of zero emission technologies, if and when they become available.

**MM ENER-1** Infrastructure for Electric Trucks/Transportation Refrigeration Units. The building shall be constructed with electrical conduits located at all loading docks, and other suitable location(s), to facilitate installation of electrical wiring and charging stations or plugs, in anticipation of future technology that allows trucks to operate partially on electricity.

A recent report entitled *2018 Feasibility Assessment for Drayage Trucks*<sup>1,2</sup> supports the analysis described in the Draft SEIR. The report performed a technology assessment to provide a near-term snapshot (2018 to 2021) of the state of zero-emitting (ZE) and near zero-emitting (NZE) truck platforms, including infrastructure readiness to fuel and service them for large-scale deployment of such platforms. The assessment summarized the relative feasibility ratings of several technologies in terms of commercial availability, operational feasibility, infrastructure availability, and economic workability. Five core ZE or NZE-fuel technologies were initially screened in the assessment, including:

1. ZEB (battery electric or direct-grid electric)
2. ZEH (hydrogen fuel cell electric)
3. NZEI (advanced diesel internal combustion engine (ICE))
4. NZEN (advanced natural gas (or propane) ICE)
5. NZEH (hybrid-electric (electric drive hybridized with an ICE using any fuel))

Two basic feasibility parameters—Commercial Availability and Technical Viability—were used to initially screen the five core fuel-technology platforms, while those technologies that met the basic needs today or were very likely to do so by 2021 were further assessed as to their operational feasibility, infrastructure availability, and economic workability. In summary, and as discussed in greater detail below, the report concluded that of the five platforms evaluated the deployment of natural gas trucks appears to be the most obvious choice to replace diesel trucks, as this technology will be available by 2021. However, infrastructure concerns for truck refueling remains a question for the successful large-scale full-transition to natural gas technology deployment. A second potential technology, battery electric trucks, is limited as to large-scale commercial availability, technological viability, infrastructure deployment, and range and weight limitations. Moreover, the remaining technologies (zero-emitting hydrogen, advanced diesel engines, and hybrid electric/fuel platforms), will not be readily available until after 2021 at the earliest.

<sup>1</sup> Port of Los Angeles and Port of Long Beach. 2019. Clean Air Action Plan, 2018 Feasibility Assessment for Drayage Trucks. Website: <https://cleanairactionplan.org/documents/final-drayage-truck-feasibility-assessment.pdf/>

<sup>2</sup> Drayage is the transporting goods a short distance via ground freight or the charge for such a transport. In freight forwarding, drayage is typically used to describe the trucking service from an ocean port to a rail ramp, warehouse, or other destination. Trucking from the San Geronio Crossing Project would likely consist of truck trips characteristic of drayage trucks.

## Commercial Availability

As of late 2018, only one ZE and one NZE technology platform are sold by original equipment manufacturers (OEM) in commercially available Class 8 trucks suitable for drayage. In addition, the assessment found that:

- ZEB battery electric technology is commercially offered in one of its Class 8 truck models by a single startup company. This is effectively an “early commercial launch.”
- NZEN natural gas ICE technology is the dominant commercially available Class 8 truck platform. All six major OEMs are offering Class 8 NZEN trucks powered by the Cummins natural gas engine.
- The other three core technologies, including ZEH, did not meet the basic criteria and considerations deemed commercially available in late 2018 nor do they appear to be on that path by 2021.

## Technical Availability

- Class 8 ZEB battery trucks are presently at the demonstration and initial systems conditioning level, but ongoing range may limit short-haul applications by 2021.
- Class 8 NZEN natural gas trucks should be technically available by 2021.
- No other ZE or NZE fuel technology platform currently exceeds a technology-level development stage.

## Operational Feasibility

- ZEB battery electric trucks usage is limited due to vehicle range, weight, and recharging times. Questions remain as to the adequacy of the service supply chain.
- NZEB natural gas trucks are the closest direct replacement for the diesel trucks in terms of operational feasibility.

## Infrastructure Availability

- ZEB battery truck deployment appears highly unlikely, if not impossible, to develop the full charging infrastructure needed by 2021.
- ZEN natural gas trucks rely on well-known and proven fueling technology. Still, the ability to deploy the required infrastructure at the pace needed to fully support the truck fleet by 2021 remains in doubt.

## Economic Workability

- ZE battery trucks have substantially higher upfront capital costs and require significant investments in infrastructure. Savings from fuel and maintenance savings, however, will not reduce the higher capital costs compared to diesel trucks.
- NZEN natural gas trucks have higher upfront capital costs but overall cost of ownership is comparable to diesel trucks.

In a separate report titled “Transitioning to Zero-Emission Heavy Duty Freight Vehicles,” the International Council on Clean Transportation (ICCT) provides an overview of advancing technologies.<sup>3</sup> The ICCT reports that although the technology is advancing and although at some point in the distant future non-diesel technology will likely be used in mass to power freight movement, “zero-emission vehicle technologies do present considerable challenges. They have a combination of near- and long-term barriers, issues, and questions that will have to be addressed before they can become widespread replacements for conventional trucks and tractor-trailers that are typically diesel fueled.”<sup>4</sup> “Tesla’s announced battery electric semi-tractor prototype is the *only* (emphasis added) battery electric project we found in our [world-wide] assessment targeting long-haul heavy-duty applications.”<sup>5</sup>

It is important to note that the project will accommodate gas, diesel, and alternatively fueled trucks including biodiesel, natural gas, hydrogen, and electric vehicles as they become commercially feasible and/or government agencies controlling emissions standards require it. Further, the Draft SEIR requires, pursuant to MM ENER-1, that the buildings be constructed with electrical conduits located at all loading docks, and other suitable location(s), to facilitate installation of electrical wiring and charging stations or plugs, in anticipation of future technology that allows trucks to operate partially on electricity. The certified Final EIR also requires, pursuant to MM AQ-1g(c), that heavy duty haul trucks be equipped with Model Year 2010 engines to further reduce the project’s transportation energy use.

Imposing extensive requirements on the proposed project related to future technology, when the various types of technological advancements and their timeframes for common availability are not known with any certainty, will not control the rate in which future truck technology including alternatively fueled trucks, are adopted.

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<sup>3</sup> International Council on Clean Transportation (ICCT). 2017. Transitioning to Zero-Emission Heavy-Duty Freight Vehicles. Website: <https://theicct.org/publications/transitioning-zero-emission-heavy-duty-freight-vehicles>. Accessed February 11, 2020.

<sup>4</sup> International Council on Clean Transportation (ICCT). 2017. Transitioning to Zero-Emission Heavy-Duty Freight Vehicles. Page 31. Website: <https://theicct.org/publications/transitioning-zero-emission-heavy-duty-freight-vehicles>. Accessed February 11, 2020.

<sup>5</sup> Ibid.

January 28, 2020

Attention : Brett Dawson

Dear Riverside County Planning Department,

I am protesting against the San Geronio Crossing /Gateway Center Project. In October, 2016 the Institute of Transportation Engineers prepared a report for SCAQMD. Why wasn't their calculation of High Cube Warehouse Analysis used.

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We know Riverside is a dirty county that really doesn't care about the health of its citizens, but only about making money for developers.

The Planning Department will push this through in spite of the people's protests – but record me as being opposed to this project since the first scoping meeting years ago and watching how this has been handled is nauseating.

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Judith Bingham

115 Veile Ave.

Beavmont, CA 92223

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## Individuals

### ***Judith Bingham (BINGHAM)***

#### *Response to BINGHAM-1*

The comment generally questions why the Draft SEIR didn't use calculations for High Cube Warehouse contained in a report prepared by the Institute of Transportation Engineers for the SCAQMD. The comment does not attach the report generally referenced or state a specific concern with respect to the analysis contained in the Draft SEIR.

The County of Riverside Board of Supervisors certified the San Gorgonio Crossing Final Environmental Impact Report (FEIR) on October 24, 2017. The certified FEIR included a variety of technical studies and regional plans, including the 2016 SCAQMD Air Quality Management Plan that was adopted on March 3, 2017, and a Traffic Impact Analysis (TIA) prepared by Urban Crossroads.<sup>6</sup> The TIA estimated trip generation rates for the project based on the Institute of Transportation Engineers (ITE) Trip Generation (9<sup>th</sup> Edition 2012) manual for the proposed land use (ITE Land Use Code 152—High-Cube Warehousing). In the case titled *Cherry Valley Pass Acres and Neighbors and Environmental Planning Group v. the County of Riverside*, the Court required the County to (1) further analyze the project's projected transportation energy use requirements, including its overall use of efficient transportation alternatives; and (2) address SCAQMD's recommendation to maximize the use of solar panels and provide an explanation as to why the mitigation measure was not adopted. The Court further ordered that (1) the remainder of the FEIR certified on October 24, 2017, is in full compliance with CEQA and remains certified, and (2) the project approvals are valid and shall remain in place.

This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted.

#### *Response to BINGHAM-2*

The comment expresses general opposition to the project. This comment is noted and is included as part of the record before decision makers. No further analysis is warranted.

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<sup>6</sup> Evatt, A., Tarikere, P., and Alvarado, B. (2017). San Gorgonio Crossing (Parcel Map No. 36093) Traffic Impact Analysis, County of Riverside. Report No. 10734-04. Costa Mesa, CA: Urban Crossroads.

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**From:** Nancy Carroll <nancyjeanc@gmail.com>  
**Sent:** Wednesday, January 29, 2020 4:53 PM  
**To:** Dawson, Brett  
**Subject:** Response to EIR 534 San Gorgonio Crossing  
**Attachments:** EIR 534 Response January 2020.docx

**CAUTION:** This email originated externally from the **Riverside County** email system.  
**DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

Hi Brett,

I have two addresses for you so I am sending my written response to both. It is attached to this email.

Please include my response in the responses to EIR (or the recirculated EIR whichever is legally appropriate).

Thank you.  
Nancy Carroll

Brett Dawson, Planning Riverside County CA.

Citizen Response to EIR 534 San Geronio Crossing

Please include in public responses

January 29, 2020

Dear Mr. Dawson

This is in response to the EIR 534 for a heavy traffic industrial “usage” change to land on Cherry Valley Boulevard in Unincorporated Cherry Valley. I continue to object to moving this project forward. While the citizens as taxpayers have had to sue to address the legality, appropriateness and risks to the property rights and quality of life issues, it seems that this project will continue to move forward to exploitative ends.

While there are few steps that can be taken by the community to stop this project, I must rightfully voice my concerns again. I will summarize as follows.

#### Zoning/Spot Zoning

This project does still spot zone a community. In prior responses to this concern, the land developer response has been to deny that this is an “island” that effectively will be rezoned (it has been now referred to as designated, not zoned) to negatively impact the rightful properties that circle this proposed development. It is not bordering on development that is similar in zoning. Hence it is an island that is spot zoned. To refer to a small commercial area that is nearly two miles away on Cherry Valley Boulevard as similar in usage is an inappropriate justification. When the response from the developer team is read, it basically comes down to that the Supervisor is able to override any land usage without full justification. Yes, the usage was changed without a general plan amendment because the Supervisor said so. This is a sad state of affairs when the tax payers must pay for the general plan development, the County planning staff, and be burdened with the results of an override because the Supervisor has ultimate authority to override all.

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#### Traffic

Caltrans does not expect the road improvements to Cherry Valley Boulevard to begin until 2023. Calimesa is striving to get this done faster by doing a minimal cost approach with a roundabout design that is only appropriate in a rural setting. There will not be adequate ingress and egress off Interstate Highway 10 until long after this property is rezoned and probably resold after entitlements are in place. While this may be the way of the world for many projects, the high impact of a trucking warehouse is a high risk for the taxpayers and citizens who must use the highway ramps daily. This is also a route to schools for many. This is an inappropriate delay and solution, quite simply because this is an inappropriate burden by rezoning (or designating) this as approved by a lead Supervisor for District 5.

2

There are so many other concerns, but I expect they will not be addressed by the planning staff nor the Supervisors. As so many say, this was a done deal from the start and as we get near the end the truth of that becomes only more evident.

Sincerely,

Nancy Carroll

1165 Lantana Road

Beaumont, CA.

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**Nancy Carroll (CARROLL)**

*Response to CARROLL-1*

The comment pertains to land use and zoning.

Impacts related to land use and zoning issues were previously analyzed in the certified FEIR. (See Section 3.10, Land Use and Planning, of the RDEIR.) The County of Riverside Board of Supervisors certified the FEIR on October 24, 2017. Subsequently, in the case titled *Cherry Valley Pass Acres and Neighbors and Environmental Planning Group v. the County of Riverside*, the Court required the County to (1) further analyze the project's projected transportation energy use requirements, including its overall use of efficient transportation alternatives; and (2) address SCAQMD's recommendation to maximize the use of solar panels and provide an explanation as to why the mitigation measure was not adopted. The Court further ordered that (1) the remainder of the FEIR certified on October 24, 2017, is in full compliance with CEQA and remains certified, and (2) the project approvals are valid and shall remain in place. This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted.

*Response to CARROLL-2*

This comment pertains to traffic impacts associated with increased use of highway ramps from Interstate 10.

Traffic impacts were previously analyzed in certified FEIR. (See RDEIR Section 3.16, Transportation and Traffic.) The comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted.

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***Zenaida Concepcion (CONCEPCION)***

*Response to CONCEPCION-1*

The commenter circled a quote that says “Planning Our Future... Preserving Our Past” and stated, “That’s what is it all about.” The comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted.

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January 20, 2020

Riverside County Planning Department  
4080 Lemon Street 12<sup>th</sup> Floor  
P O Box 1409  
Riverside, Ca 92502-1409

Re: SEIR: San Gorgonio Crossing

Dear Brett:

Thank you for yet another opportunity to respond to this Project. I have responded to only what was written in the SEIR as requested. Since it was a mere 30 pages, it didn't take long and showed how seriously this developer took the court rulings.

On page 1-1 the SEIR states in the background information section that when the original DFEIR was circulated that “various comments were submitted during the public review period.” This is an understatement if there ever was one and by using the word “various” the writers of this SEIR seem to want it to appear that only a minimal opposition was made to this project. The truth is that when the original FEIR was circulated there were 605 protest letters sent to Riverside County Planning -- it was my understanding that this was the most letters they had ever received on a single project. At that point, apparently to avoid answering that avalanche of letters, the county decided to “revise and re-circulate” the FEIR and indicated that the first letters would not be answered and only new letters would get a written response. Well, if it was thought that this new scheme would result in fewer letters this second time, that proved incorrect! For the second DEIR, 760 letters in opposition deluged Riverside County planning department. It took over 1000 pages in the Final EIR to respond to all of them. Because there are three new county supervisors since this project was approved, I think this is an important fact for them to know.

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On page 1-3 the SEIR states that: “*An SEIR is also appropriate where, as here, a court rules that portions of the original FEIR were inadequate and additional environmental analysis should be performed.*” Let's be perfectly clear -- the only reason that this SEIR is being written is because these land

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speculators were sued and lost the court case. And the SEIR is not only appropriate but required by the subsequent court ruling. The importance of analyzing the additional environmental studies and evaluating the conclusions made cannot be overstated. They should meet the legal requirements of the court findings and not just be canned comments pulled from other EIRs. Statements unsupported by evidence cannot by definition, meet that legal threshold and should not be considered in the final decision making process. The burden of proof that the legal requirements have been met is on the developer. I would hope that this board of supervisors will hold them to that requirement this time around.

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CONT

Speaking of statements unsupported by evidence, on Page 2-4 the SEIR states: *“Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.”* It would certainly be nice if that statement always proved true. But there is nothing in that paragraph that says anything about enforcement or even verifying what equipment the contractors and owners are actually using on the job. It’s like making a statement that those who drive gas guzzling pickups and SUVs would have a “strong financial incentive” to drive a more economical and efficient car and then making the assumption that in fact this is what they **would** do. But that assumption might not be true. They may really like their gas guzzler or it’s paid for -- there could be a myriad of reasons that those drivers would not go out and get a more efficient and economical car. Therefore, the “strong financial incentive” does not guarantee that they will get a new vehicle that meets the accepted standards of efficiency and economy.

3

In the same way, if the SEIR makes the unsupported statement that the contractors will be using equipment that meets the federal standards for fuel efficiency because they have a strong financial interest to do so, then this must be supported by some evidence that the statement is actually true. The SEIR doesn’t indicate that any verification of this statement was made. Without that evidentiary support, the SEIR can’t categorically state that *“Therefore this project’s fuel consumption would not be inefficient, wasteful and unnecessary”* If you are going to claim that the most efficient and economical equipment is being used on your construction project and then use that statement to support your conclusion, there must be some kind of evidence that this is indeed true.

4

On page 2-10 there is the reiteration of the same “signage” that had been included in the original FEIR which will inform the truck drivers of the health effects of diesel particulates, the idling regulations and then a phone number to call for violations. The paragraph does not state exactly who is going to report these offenses -- although it will probably not be the other truck drivers. Merely posting a sign does not have any impact without someone enforcing the regulations. It’s similar to posting the sign at the handicap parking spaces. That sign does no good if it’s not enforced -- as was shown when a enforcement team actually verified the handicapped placards displayed in the cars parked in those handicapped parking spaces and found many to be in violation. Simply stating that a “sign” asking everyone to be a “good neighbor” will meet a mitigation measure is naïve, and if it is unsupported by any evidence that it will be enforced -- there is no reason to put any faith in the statement.

5

On Page 2-11 it says that there will be bicycle spaces available -- that might be a feasible mitigation if this warehouse was being built in a logical and appropriate location. But it’s out in the middle of a rural area and the use of bicycles to get to work is unlikely and therefore would have a negligible effect on fuel consumption. Also stating that the ridesharing program will result in a 1-15% reduction in vehicle miles traveled for commute trips is only valid if the ridesharing program is instituted and more or less mandatory. In this case it is only “encouraged” and available so the benefits of reduced vehicle miles cannot be used as a satisfaction of a mitigation measure *until and when* it can be shown that there really is a valid ridesharing program in effect and statistics show that it has actually reduced vehicle miles. This SEIR has used the benefit of reduced miles because of bicycle riding and ridesharing-- which has no basis in actual data-- and plugged it in their Table 2-2 to show that this mitigation measure has been met and significantly reduced the vehicle miles traveled to work.

6

Again, simply stating that the ridesharing program will reduce the vehicle miles traveled does not make it true unless it is actually in effect and statistics have been collected. This fact was made clear in a 2016 Report from the Institute of Transportation Engineers in Washington DC where on page 19 it indicated the there were significant weakness in the ability to forecast vehicle trips with confidence. The problem is compounded in this case since there is no indication of what kinds of businesses will be leasing

this building and therefore how is it possible to estimate a reduction of miles traveled or use that estimate to show that the transportation energy use was affected in any way when there is no way to know the number of workers? This makes the Table 2-2 merely wishful thinking.

6  
CONT

On that same page it states that workers can commute from nearby areas reducing the overall vehicle miles traveled. This would certainly be true if it was guaranteed that the employees will be hired from those nearby areas. Perhaps a requirement that a certain percentage of workers must come from within 5 miles of the project needs to be added. That would not only bolster this mitigation measure, but also fulfill one of the promises made by the developer and might actually be the supporting evidence on one of the “overriding considerations” that this warehouse would result in more local jobs. Without that stipulation the statement that workers will come from nearby areas is mere conjecture and can’t be used to prove that the overall vehicle miles traveled will be reduced. And as stated before, without the knowledge of exactly who the occupants of this building will be -- and no one knows -- any statement of workers reducing vehicle miles traveled is unsubstantiated and unproven and therefore does not meet the legal requirement of proof.

7

On page 1-4 it states that the SEIR will “*address the SCAQMD’s comment suggesting that the project maximize the use of solar panels and provide an explanation about whether the mitigation measure was adopted.*”

According to the cover letter sent by the planning department, and page 1-1 of the SEIR, the actual words the court used and what they want to see in the finished document was an analysis of the SCAQMD **recommendation** (not suggestion) to maximize the use of solar panels and to provide an explanation as to **why** the mitigation measure was **not** adopted.” (Emphasis is mine.) The statement in the SEIR does not reflect what the court ordered to be done.

8

A second time in the SEIR (Page 2-13) it states that the developer is responding to the “suggestion” in the SCAQMD letter about using the maximum number of solar panel on this project. In the letters I’ve read in which the Air Quality Board responded to a development project, it was made clear that there was to be a “good faith effort” (their words), on the part of the developer to work with the local utility to install the **maximum** number of solar panels that would fit on the roof or the project site in order

to reduce the project's overall significant regional air quality impacts and reduce the GHG impacts during operation. This would appear to be more than a suggestion. To quote from the actual letter the SCAQMD sent in response to the FEIR on July 6, 2017 it says: *"The lead agency should incorporate the following onsite area source mitigation measures below to further reduce the proposed project's significant operational air quality impacts: a). Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility."* (end quote).

8  
CONT

One of the "overriding considerations" used by the Board of Supervisors to approve this project and certify the original REIR (Letter "G" of the Certification Document) was that a significant benefit would be that the project will establish roof top solar panels that will provide approximately 23% of the project's power. Since this particular overriding consideration is a simple reiteration of what was stated in the RDEIR -- and was determined by the courts to be insufficient --how can this be used as evidence of a significant benefit? An overriding consideration is supposed to be (according to the Public Resource Code #21081) those significant reasons and benefits which were used to approve the project regardless of its impacts on the environment and they must be supported by substantial evidence in the record.

9

In this case, the court ruled that the use of solar panels was not adequate and there must be additional evaluation and explanation as to why the maximum number of solar panels weren't even considered let alone incorporated into the project. However, as it turns out, the actual conclusion and findings in the SEIR don't support the recommendation of the SCAMD or the "overriding consideration" either because on page 2-15 of the SEIR it states categorically that *"the use of solar energy, including solar panels, will not meaningfully reduce the projects significant and unavoidable operational air emission impacts."* Since this admission comes directly from the developer, how is it possible for any solar panels to be considered of such significant benefit that they are included in an "overriding consideration" and used as a basis for approval?

10

I had no doubts that "maximizing solar" would probably be a quick fix -- as it certainly turned out to be. Grudgingly, on page 2-15 the developer

11

promises to “maximize the use of solar panels” even though it doesn’t do any good! As I said, a quick fix. However, in my personal opinion, the court challenge to the RDEIR on the use of solar panels also high-lights the deficiencies of the “overriding considerations” that were used to certify the EIR. Using wording directly from the EIR is not providing “substantial evidence” per CCR 15091 3(a) or even showing significant benefits from the project that would override the negative impacts. It’s simply saying that whatever the developer states in the EIR is a good enough reason to ignore the negative impacts this warehouse will have on the environment of Cherry Valley, as well as disregarding reams of opposition from the people most affected by the project. Whenever inadequate reasons, unsupported by any objective evidence, are used to approve a highly controversial project such as this one, it inevitably leads the reader to wonder why.

11  
CONT

Again, thank you for the opportunity to respond to the SEIR for this project. I am grateful that we still have the CEQA Guidelines to at least impose some sort of environmental restrictions on developers who would otherwise run rampant through our county. It would be nice if those guidelines, along with the General Plan, were taken seriously by everyone involved. But developers donate to the supervisors and then cut corners and do the bare minimum unless forced to do more by a court case, public agencies approve without reading carefully and even when the people get massively involved as they did in this case, they are ignored. A sad commentary on the way our county works.

12

Sincerely yours,



Mary A. Daniel  
P O Box 2041  
Beaumont, CA 92223

**Mary A. Daniel (DANIEL)**

*Response to DANIEL-1*

The comment states that there were a greater number of protest letters previously received on the FEIR than was stated in the Draft SEIR. This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted. This comment will be provided to the County decision makers for their review and consideration.

*Response to DANIEL-2*

The comment states that the SEIR is necessary and required to meet the legal requirements of the Court ruling. This comment does not identify environmental impacts or raise issues about the environmental analysis contained in the Draft SEIR. The analysis of all environmental impacts was provided in complete detail within both the previously certified FEIR and the Draft SEIR. All comments provided during the public review of these two documents have been addressed thoroughly. Since this comment was not relevant to the topical areas analyzed in the Draft SEIR, no further analysis or response is warranted.

*Response to DANIEL-3*

This comment objects to the observation in the Draft SEIR which states: “Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.” Specifically, the comment asserts that the paragraph does not say anything about the enforcement or verification of the equipment that contractors and owners will use during construction.

This comment is inaccurate. The rational goal of any construction job, whether it be for a household task or large construction project such as the San Gorgonio Crossing Project, is to minimize construction costs while meeting all legal requirements for doing so. Further, the Draft SEIR describes that the project is required to implement a number of mitigation measures that will result in an efficient use of all types of energy over the project’s implementation period. Specific to construction, the Draft SEIR describes that compliance with federal and State regulations, as well as implementation of the mitigation measures required by the previously certified FEIR (see RDEIR Section 3.3, Pages 3.3-38 to 3.3-40 and in the adopted Mitigation Monitoring and Reporting Program [MMRP]) will ensure construction fuel consumption associated with the proposed project would not be inefficient, wasteful, or unnecessary, and would not otherwise conflict with or obstruct a State or local plan for renewable energy or energy efficiency. MM AQ-1a requires all off-road diesel-powered construction equipment greater than 50 horsepower to meet or exceed Tier 3 engine emissions standards. This will ensure that on-site construction equipment will utilize Tier 3 engines or higher which maximize fuel efficiency and reduce unnecessary fuel consumption. MM AQ-1e addresses the enforcement of mitigation measures by the County of Riverside as to equipment type, design specifications, and maintenance records. Implementation of MM AQ-1e will ensure that all construction equipment will be operated in a manner that will employ the most fuel-efficient equipment and minimize short-term construction energy.

**MM AQ-1e** During project construction, the following measures shall be implemented to the satisfaction of the County of Riverside. Construction equipment maintenance records and data sheets of equipment design specifications (including the emission control

tier of the equipment) shall be kept on-site during construction and subject to inspection by the County of Riverside.

- a) Construction equipment shall be properly maintained according to manufacturer specifications.
- b) All contractors shall turn off all construction equipment and delivery vehicles when not in use, or limit on-site idling for no more than 5 minutes in any 1 hour.
- c) On-site electrical hook ups to a power grid shall be provided for electric construction tools including saws, drills, and compressors, where feasible, to reduce the need for diesel-powered electric generators.
- d) The project shall demonstrate compliance with South Coast Air Quality Management District (SCAQMD) Rule 403 concerning fugitive dust and provide appropriate documentation to the County of Riverside.
- e) Traffic speeds on all unpaved roads to be reduced to 15 miles per hour or less.
- f) Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).
- g) Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1.
- h) All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe.
- i) All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 miles per hour (mph); wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction; and vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.
- j) All trucks and equipment, including their tires, shall be washed off prior to leaving the site; site accesses to a distance of 100 feet from paved roads shall be treated with a 6- to 12-inch compacted layer of wood chips, mulch, or gravel.

These mitigation measures will be implemented and enforced by their incorporation into the project's MMRP, and the County of Riverside will ensure these measures are appropriately implemented.

*Response to DANIEL-4*

This comment further refers to the issue of fuel efficiency regarding construction equipment. See response to Daniel-3, above.

*Response to DANIEL-5*

This comment refers to the inclusion of "signage" that will inform truck drivers of the health effects of diesel particulates, including idling restrictions and a phone number to call for violations.

MM AQ-1g of the previously certified FEIR requires implementation of measures to reduce emissions, including MM AQ-1g(a) which requires signs informing truck drivers about the health effects of diesel particulates and California Air Resources Board diesel idling regulations; MM AQ-

1g(b) which requires signs informing truck drivers that they shall turn off engines when not in use and not idle for more than five minutes, and providing numbers of the building facilities manager and California Air Resources Board to report violations. This mitigation measure will be implemented and enforced by incorporation into the project's MMRP, and the applicant and County of Riverside will ensure these measures are appropriately implemented.

**MM AQ-1g(b)** Prior to issuance of a certificate of occupancy, post signs in all dock and delivery areas containing the following: truck drivers shall turn off engines when not in use; trucks shall not idle for more than five minutes; telephone numbers of the building facilities manager and the California Air Resources Board to report violations.

For example, telephone numbers for reporting violations would be provided for the following entities, and signage with these numbers would be posted at all facility entrances:

- County of Riverside Code Enforcement (951-955-2004)
- South Coast Air Quality Management District (1-800-CUT-SMOG)
- California Air Resources Board (1-800-952-5588)

Additionally, all heavy-heavy duty diesel tractor truck drivers that access the project site will be provided two fact sheets for their information:

- Fact sheet on Health Effects of Diesel Exhaust
- Fact Sheet on Changes to California's Commercial Vehicle Idling Regulation

*Response to DANIEL-6*

The comment states that a rideshare program would not be effective unless the rideshare program is mandatory. MM AQ-1h of the RDEIR, Section 3.3, Air Quality, requires all tenants to participate in Riverside County's Rideshare Program and states that the program shall provide employees with assistance in using alternate modes of travel, including carpooling encouragement, ride-matching assistance, and vanpool assistance. This mitigation measure would require the rideshare program to be instituted by the tenant. According to a recent Park & Ride/Commute Survey prepared for the San Diego Association of Governments and the Riverside County Transportation Commission, among Riverside County residents who currently drive alone to work, the most preferred alternative commute mode is a traditional carpool (23.7 percent) followed by an on-demand rideshare service (20.3 percent). More than half of the respondents from Riverside County said they would be willing to use an alternative mode of transportation.<sup>7</sup> While the research shows that Riverside County residents are open to ridesharing, there must be options available for those interested in ridesharing. The Riverside County Rideshare Program would not only require this option to be provided by the building tenant, but would also offer incentives for those who choose to participate in the program. For additional information about the project's reduction in transportation energy demand, see response to UREMOVIC-1, below.

<sup>7</sup> True North Research, Inc. (2018). Park & Ride/Commute Survey. Prepared for SANDAG. Website: [https://www.sandag.org/uploads/publicationid/publicationid\\_4549\\_24879.PDF](https://www.sandag.org/uploads/publicationid/publicationid_4549_24879.PDF). Accessed February 6, 2020.

*Response to DANIEL-7*

This comment questions the geographical proximity of employees who would work at the project site. The certified FEIR (Section 3.13, Population and Housing, of the RDEIR) previously estimated the number of employees the project would generate and where they would be located. The estimation is based on the Fiscal and Economic Benefits Study prepared for the project by Kosmont in 2015. The project would generate approximately 518 full-time direct equivalent employees, 116 indirect employees, and 115 induced employees for a total of 748 permanent, full-time employees. Construction would also generate approximately 577 short-term employees (direct, indirect, and induced). Most of the new jobs would be filled by local residents, due to the current economic climate of the region. As stated in the certified FEIR, a report called the Economic Impact of the Gateway Distribution Center was used to determine that the project would provide local jobs to the surrounding area. The study indicated that the Pass Area had an 11.5 percent unemployment rate in 2013.<sup>8</sup> Additionally, the report indicated that the Pass Area's jobs-to-housing ratio is approximately 0.598. The jobs-to-housing ratio reflects the availability of local jobs for each occupied home in a community. The Pass Area is far below the 1.102 ratio for the Inland Empire or the 1.168 ratio for all of Southern California. The certified FEIR concluded that by providing local jobs to the surrounding area, the project would help improve the existing jobs-to-housing ratio.

*Response to DANIEL-8*

The comment asserts that the Draft SEIR did not address the Court's order to address SCAQMD's recommendation to maximize the use of solar panels and provide an explanation as to why the mitigation measure was not adopted. The comment is incorrect. See response to CVAN-1, above.

*Response to DANIEL-9*

The comment asserts that the use of rooftop solar panels was one of the overriding considerations used by the Board of Supervisors to approve the project and was later found to be insufficient. The comment is incorrect. The Court upheld the County Board of Supervisors' adoption of a statement of overriding considerations and did not determine that it was insufficient. As such, the statement of overriding considerations remains in place and is not subject to further consideration or approval. As this comment does not address the additional analysis required by the Court and contained in the Draft SEIR, no further analysis or response is warranted. Notwithstanding, it should be noted that the Draft SEIR describes that the project will install more solar, not less. Moreover, the statement of overriding considerations identified a number of economic, legal, social, technological and other benefits of the project, and specifically found that each and every benefit individually outweighed and rendered acceptable each and every one of the project's significant environmental effects.

*Response to DANIEL-10*

The comment claims that the court ruled that the use of solar panels was not adequate. This comment is incorrect. See Responses to CVAN-1 and DANIEL-9, above.

*Response to DANIEL-11*

This comment claims that maximizing the use of solar panels is inadequate and unsupported by evidence. This comment is incorrect. See Responses to CVAN-1 and DANIEL-9, above.

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<sup>8</sup> Economics & Politics, Inc. 2014. Economic Impact of Gateway Distribution Center. January.

*Response to DANIEL-12*

This comment implies that environmental review pursuant to CEQA is not taken seriously by those involved. This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted. This comment will be provided to the County decision makers for their review and consideration.

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**From:** Brady, Russell <rbrady@RIVCO.ORG>  
**Sent:** Wednesday, January 29, 2020 7:08 PM  
**To:** Thomas G Dean  
**Cc:** Dawson, Brett  
**Subject:** RE: San Gorgonio Crossing/Gateway Center Project

I have cc'd the project planner here to include your comments for the record.

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: Thomas G Dean <tdtommy@charter.net>  
Date: 1/29/20 3:53 PM (GMT-08:00)  
To: "Brady, Russell" <rbrady@RIVCO.ORG>  
Cc: 'tdtommy' <tdtommy@charter.net>  
Subject: San Gorgonio Crossing/Gateway Center Project



I have just heard about this project and based on the information that I have received, traffic on Cherry Valley Blvd would be greatly increased and there would be a decrease in property values in nearby areas. It is for these two reasons I strenuously protest this project.

1

I am writing to you because I just learned of this and will not be able to get a letter of protest in before the deadline of tomorrow. We are new to Beaumont and Riverside County and would hope that the planning commission would keep the wishes of the people as a priority over the wishes of big business.

2

Thank you for your attention.

Tom Dean

Email: [tdtommy@charter.net](mailto:tdtommy@charter.net)

Tel: 715-212-1482

Address: 1743 Dalea Way

Beaumont, CA 92223

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**Thomas G. Dean (DEAN)**

*Response to DEAN-1*

This comment raises general concerns about impacts to traffic and property values resulting from the project.

Economic or social considerations such as real estate values are not within the purview of CEQA or the Draft SEIR. Further, traffic impacts were previously analyzed in the certified FEIR. (See RDEIR Section 3.16, Transportation and Traffic.) The County of Riverside Board of Supervisors certified the FEIR on October 24, 2017. Subsequently, in the case titled *Cherry Valley Pass Acres and Neighbors and Environmental Planning Group v. the County of Riverside*, the Court required the County to (1) further analyze the project's projected transportation energy use requirements, including its overall use of efficient transportation alternatives; and (2) address SCAQMD's recommendation to maximize the use of solar panels and provide an explanation as to why the mitigation measure was not adopted. The Court further ordered that (1) the remainder of the FEIR certified on October 24, 2017, is in full compliance with CEQA and remains certified, and (2) the project approvals are valid and shall remain in place.

This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted.

*Response to DEAN-2*

The comment states that the commenter will not have sufficient time to submit a letter of protest. The comment further states that Riverside County should prioritize the wishes of the people. This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted. This comment will be provided to the County decision makers for their review and consideration.

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**From:** composerx <composerx@verizon.net>  
**Sent:** Thursday, January 30, 2020 8:07 AM  
**To:** Dawson, Brett  
**Subject:** please read attached letter  
**Attachments:** dawson.rtf

Brett Dawson Project Planner

Riverside County Planning Department

4080 Lemon Street, 12th Floor Riverside, CA 92501

Re: Comments on Draft Supplemental Environmental Impact Report No. 534, San Geronio Crossing Project

Dear Mr. Dawson:

On behalf of the residents of Cherry Valley , Beaumont and Calimesa who had signed petitions against this warehouse that I had circulated which numbered in the 100's , I again appeal to you on their behalf . We do not want to see this warehouse placed in a spot where 4 senior communities are present . Rancho calimesa is incredibly close . There are places for warehouses and this area is not one that deserves to have the community destroyed by a greedy person who lives nowhere around here . We live here . You do not . The supervisors do not and this land developer does not . WE DO , nor do we wish to have property values decimated by a project that during my circulation efforts 99% of the people who signed these petitions were against . It was obvious that during the 1st supervisor meeting when the room overflowed with citizens protesting this project , and the largest attendance ever , the strength of the community is certainly obvious in its opposition to a warehouse that should be put somewhere out of our rural community . Plus you received over 600 letters of protest. Why is the county NOT listening to its residents ? If democracy was present as it should be , the county would hear our plea to keep this area at the current zoning .

There are deficiencies in the sdeir writ that are not being addressed , which to us are some of the most important . One being the massive congestion in truck traffic and even worse , the pollution that over 800 trucks a day are going to bring to this area . It appears that the solution to the pollution problems is to put up solar panels on the warehouse . We would appreciate knowing just what solar panels have to do with massive truck pollution . Any changes in the off-on ramps to try and provide accomodation to this amount of truck traffic will still be an unsolveable problem and complete without safety for residents trying to maneuver with so many trucks . Cherry valley blvd. will become a major problem as it is the main road to leave the area towards the western side to the 10 freeway . The residents who now live so close to this land will be hearing trucks and breathing truck fumes constantly . Why would the county allow so many people to lose the quality of live they purposely moved here to get away from ? Plus this property is an animal migration spot and a most important place where the Beaumont basin receives a large part of its water supply . Cementing over it and creating a diminished water supply is absurd in an area that will continue to have drought problems . All these are negative situations and to make matters worse by giving approval seems beyond belief .

You have heard us . Now please do what is the correct solution and do not allow any zone changes in one of the last pristine areas the county has left and allow it to continue being the rural community we

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all care about .

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Thank you for paying attention ...

Patrick Doherty . Cherry Valley

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**Patrick Doherty (DOHERTY)**

*Response to DOHERTY-1*

The comment notes general concerns about the siting of the project due to its proximity to the nearby community.

The County of Riverside Board of Supervisors certified the FEIR on October 24, 2017. Subsequently, in the case titled *Cherry Valley Pass Acres and Neighbors and Environmental Planning Group v. the County of Riverside*, the Court required the County to (1) further analyze the project's projected transportation energy use requirements, including its overall use of efficient transportation alternatives; and (2) address SCAQMD's recommendation to maximize the use of solar panels and provide an explanation as to why the mitigation measure was not adopted. The Court further ordered that (1) the remainder of the FEIR certified on October 24, 2017, is in full compliance with CEQA and remains certified, and (2) the project approvals are valid and shall remain in place.

This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted.

*Response to DOHERTY-3*

The comment notes generalized concerns about the project's effect on property values.

Economic or social considerations such as real estate values are not within the purview of CEQA or the Draft SEIR. Further, this comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted. This comment will be provided to the County decision makers for their review and consideration.

*Response to DOHERTY-3*

The comment is about community opposition to the project and concern about a zone change.

Impacts related to land use and zoning issues were previously analyzed in the certified FEIR. (See Section 3.10, Land Use and Planning, of the RDEIR.) This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted.

*Response to DOHERTY-4*

This comment raises general concerns regarding truck traffic and associated pollution. Traffic and air quality impacts were previously analyzed in the FEIR certified by the Riverside Board of Supervisors on October 24, 2017. In certifying the FEIR, the Riverside Board of Supervisors affirmed the adequacy of the analyses related to traffic impacts. This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted.

This comment also questions the relevance of the solar panel analysis. As stated in the Notice of Preparation of a Draft SEIR, after the County of Riverside Board of Supervisors certified the FEIR for this project, two entities filed legal actions challenging the EIR, which were consolidated and heard by the Riverside Superior Court. On February 7, 2019, in the case titled *Cherry Valley Pass Acres and Neighbors and Environmental Planning Group v. the County of Riverside*, the Court ordered the

Respondent County of Riverside (County) to address in its FEIR the SCAQMD recommendation to maximize the use of solar panels and provide an explanation as to why the mitigation measure was not adopted.

*Response to DOHERTY-5*

The comment notes generalized concerns about animal migration and water supply. This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted. This comment will be provided to the County decision makers for their review and consideration.

*Response to DOHERTY-6*

The comment expresses opposition to the zone change and land use. Impacts related to land use and zoning were previously analyzed in the San Geronio Crossing FEIR certified by the Riverside Board of Supervisors on October 24, 2017. This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted. This comment will be provided to the County decision makers for their review and consideration.

Date: Jan. 27, 2020  
To: Riverside County Planning Department  
From: Faith Donavin  
Re: San Gorgonio Crossing/Gateway Center Project

I believe this project should be rejected for the following reasons:

- Paving over the watershed that Cherry Valley depends on will be disastrous;
- Air pollution from trucks frequenting the area will be unhealthful;
- Traffic on Cherry Valley Blvd. will be untenable;
- There is so much unused warehouse footage in the area that it is infeasible.

My greatest concern is the paving over of our watershed.

Yours truly,



Faith Donavin  
40801 Cheyenne Trl.  
Cherry Valley, CA 92223

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***Faith Donavin (DONAVIN)***

*Response to DONAVIN-1*

The comment states generalized concerns regarding potential impacts on the watershed, traffic, unused warehouse footage, and air pollution from trucks. Environmental impacts related to water and traffic were previously analyzed in the San Geronio Crossing FEIR certified by the Riverside Board of Supervisors on October 24, 2017. This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted.

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**From:** Stephen Hilario <shilario9@gmail.com>  
**Sent:** Tuesday, December 31, 2019 6:06 PM  
**To:** Dawson, Brett  
**Subject:** EIR-No-534-San-Gorgonio

CAUTION: This email originated externally from the Riverside County email system. DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Brett,

What is their plan for the existing easements for address 9975 Roberts St, Cherry Valley? I've not been asked to sign away my rights to access my property on, what would be the south and north entrances. The north entrance will be completely blocked by the new Yucaipa water facility. I can provide documents to better illustrate what I'm talking about.

1

Regards,  
Stephen Hilario  
805-207-6052

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**Stephen Hilario (HILARIO)**

*Response to HILARIO-1*

This comment inquires about the plan for the existing easements for 9975 Roberts Street in Cherry Valley, California. Specifically, the comment inquires about the location of the south and north entrances to the project site, with concern that the north entrance to the site will not be accessible due to a new Yucaipa water facility.

An analysis related to site access was provided in the FEIR certified by the Riverside Board of Supervisors on October 24, 2017. This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted. This comment will be provided to the County decision makers for their review and consideration.

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Stanley L. Ross  
40285 Grand Ave  
Cherry Valley CA  
September 20 2019

Riverside County Planning Department  
4080 Lemon Street, 12<sup>th</sup> Floor  
Riverside, CA 92502

Project Title: San Geronio Crossing Gateway Center Project  
Attn: Brett Dawson-Project Planner

Mr. Dawson et al:

I am writing this letter to express my opposition to this project

As you are well aware, it is impossible to estimate the number of vehicle trips and pollution created for this "project". The Interstate 10 corridor is already a congested road and is one of the most polluted areas in the USA-per MSN.com. Let me know if you want the specific reference and I shall gladly provide to you.  
It is impossible to estimate the number of vehicle trips and pollution created for this because the warehouse and its occupants have NOT been identified. The ONLY focus in changing Cherry Valley's zoning from one house per acre.  
Shopoff and crew have NOT stated the warehouse use before the number of vehicles can be counted. Perhaps you and others have a crystal ball...  
Shopoff does NOT live in Cherry Valley and only wants to destroy the area- along with many politicians who will gladly sell themselves to the Devil (as the saying goes)

1

I have sent you prior letters indicating my opposition to this project and my opposition remains **UNCHANGED**. I am certain you have maintained these on file yet here we are regurgitating. This area remains a wildlife corridor, watershed, etc. High Density Housing and the "Crossings" are UNACCEPTABLE. Every Riverside County elected official and appointed official MUST stop selling out to corrupt Developers every time money or a ride on a boat is offered as a carrot. As a resident, voter, citizen, I expect them to be honest, protect, and represent their constituents as they have sworn themselves to do.

2

  
Stanley L Ross

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**Stanley L. Ross (ROSS)**

*Response to ROSS-1*

This comment states that the number of vehicle trips and pollution cannot be estimated without identifying the proposed warehouses' uses and occupants.

The project's trip generation was previously analyzed in the certified FEIR. (See Section 3.16, Transportation and Traffic.) In order to estimate the traffic characteristics of the project, trip-generation statistics published in the Institute of Transportation Engineers (ITE) Trip Generation (9<sup>th</sup> Edition 2012) manual for the proposed land use (ITE Land Use Code 152—High-Cube Warehousing) were used. This particular rate was selected based on the project's design and operating characteristics. The project trip generation summary is based on a total building area of approximately 1,860,760 square feet, while the project will only provide approximately 1,823,760 square feet; thus, the Traffic Study slightly overestimated the additional traffic that will be attributable to the project, resulting in a more conservative analysis. Although the number of employees can be used to estimate vehicle trips, using building square footage as an estimator for vehicle trips is a commonly accepted method.

This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted.

*Response to ROSS-2*

This comment expresses general opposition to the project, including concerns about wildlife corridors and watersheds, as well as opposition to high density housing.

These issues were previously analyzed in the certified FEIR. This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted.

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From: [Marc Sanders](#)  
To: [Rhea Weber](#)  
Cc: [Dawson, Brett](#); [Bruce & Charlene Byers](#); [Diane & John Franklin](#); [Glen Dye](#); [Patrick W. Doherty](#); [Reeley, Patsy](#); [Robert C. Goodman](#)  
Subject: Re: SDEIR 534  
Date: Wednesday, January 29, 2020 5:55:03 PM

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I read it before, and I think it's good.

Marc

1

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Rhea Weber

Wednesday, January 29, 2020 4:32 PM

Please see attached response.

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***Marc Sanders (SANDERS)***

*Response to SANDERS-1*

The commenter states that he has reviewed the project CEQA documentation and found it to be appropriate. Comment noted.

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Libi Uremovic  
1440 E. 6th Street  
Beaumont, California 92223  
(702) 503-2022  
libiure@gmail.com

Riverside County Planning Department  
4080 Lemon Street, 12th Floor  
Riverside. CA. 92502-1409

Project Title: San Gorgonio Crossing/Gateway Center Project  
Attn; Brett Dawson, Project Planner

The Notice states: "Comments on the adequacy of the analysis included in the Draft Supplemental EIR may be made in writing, indicating the sections of concern. Comments should be limited to only the two issue areas outlined above that are being reviewed within this Draft Supplemental EIR."

Table 2-3 on page 2-13 of Draft SEIR claims a reduction in fuel consumption from 6,569/day to 5,919/day based on "participating in ride sharing programs" and "locating the project in close proximity to the I-10".

1

Actual participation in ride sharing programs can not be guaranteed and the land is no closer to the I-10 than it was in 2015. The I-10 corridor has already turned into a congested boulevard and has become the most polluted area in the U.S.A.: <https://www.msn.com/en-us/health/wellness/the-30-most-polluted-places-in-america/ss-BBXlaMW?li=BBnb7Kz#image=31>

In October, 2016 the Institute of Transportation Engineers in Washington D. C. Prepared a Report for the SCAQMD and the National Association of Industrial and Officers Properties titled: High-Cube Warehouse Vehicle Trip Generation Analysis: <https://www.ite.org/pub/?id=a3e6679a%2De3a8%2Dbf38%2D7f29%2D2961becdd498>

2

The Report identifies five different types of warehouses and compares them to a 'standard warehouse'. Page 19 of the Report states: "The preceding analysis of available HCW trip generation data identified significant weaknesses in the ability to forecast vehicle trips with confidence."

It is impossible to estimate the number of vehicle trips and pollution created for this project because the type of warehouse and occupants of the warehouse have never been revealed. The only focus is in changing Unincorporated Cherry Valley's Zoning from one house per acre.

The Developer must state the warehouse's use BEFORE the number of vehicles can be estimated. Does Shopoff have a Contract for an occupant of this warehouse he's spending millions to build or is the entire warehouse zoning nothing but a diversion to pressure Unincorporated Cherry Valley to accept high-density housing?

3

A major contributor in the air pollution is the City of Beaumont's construction of over 20,000 houses and 9 Million square feet of warehouses without filing any CEQA EIRs or mitigation of traffic and air pollution.

4

Because Beaumont has no primary industries; almost the entire population of Beaumont's working class commute to work, which added thousands of daily commutes contributing to the smog along the I-10 corridor that has never been mitigated.

Beaumont has also 'approved' over 9 million square feet of warehouses further adding to the congestion and smog. Facilities include Wolverine, Lowes, Icon, and a massive Amazon warehouse that's almost completely built and will add hundreds more vehicles' daily trips to the already congested and underdeveloped I-10, 60, and 79 highways.

The Pass Area is only two miles wide and surrounded by mountains. Warehouses and high density housing should have never been allowed in the Pass Area because if the wind isn't blowing the smog is trapped between the mountains. Additional warehouses and/or high density housing will leave the Pass Area uninhabitable for children, the elderly, and the sickly.

5

Every Property Owner in Unincorporated Cherry Valley purchased their property knowing of the one house per acre zoning and everyone living in Unincorporated Cherry Valley want their zoning to remain one house per acre.

6

Shopoff does not live in Unincorporated Cherry Valley, he just wants to destroy Unincorporated Cherry Valley and everyone else's property values and health for his own financial gain. All of Unincorporated Cherry Valley must stay zoned one house per acre for the benefit of the entire Pass Area and Riverside County.

For the health of all Pass Area residents; please return this property to it's original zoning of one house per acre, which will reap much more profit than a warehouse.

Thank you,



Libi Uremovic

### ***Libi Uremovic (UREMOVIC)***

#### *Response to UREMOVIC-1*

This comment states that ride sharing programs cannot be guaranteed, and questions the fuel consumption reductions shown in Draft SEIR Table 2-3: Daily Vehicle Fuel Consumption.

This is incorrect. The certified FEIR Mitigation Measure MM AQ-1h(a) requires that all tenants participate in Riverside County's Rideshare Program. Thus, participation in the County's rideshare program is an enforceable requirement. The program, provided by the Riverside County Transportation Commission, provides access to a network of carpool, vanpool, and alternative transit options, and incentive programs and subsidies to commuters.<sup>9,10</sup> Also, it should be noted that the project's reduction in transportation energy demand related to fuel consumption is based on the requirements that the project operations use 2010 or newer on-road heavy-duty trucks, SmartWay verified technologies, ride sharing programs, and "end-of-trip" facilities, which would reduce fuel and energy consumption by approximately 9 to 10 percent, or up to 99 gallons per day from passenger vehicles and light-duty trucks, and 551 gallons per day from heavy-duty trucks. The calculations supporting the reductions are contained in the RDEIR Appendix B: Air Quality and Greenhouse Gases.

#### *Response to UREMOVIC-2*

This comment states that the number of vehicle trips and pollution cannot be estimated without identifying the proposed warehouses' uses and occupants. Please refer to Response to ROSS-1.

#### *Response to UREMOVIC-3*

This comment states that the number of vehicle trips cannot be estimated without identifying the proposed warehouses' uses and questions whether the project is proposing high-density housing. Please refer to Response to ROSS-1.

#### *Response to UREMOVIC-4*

The comment pertains to the projects under construction in the City of Beaumont.

Cumulative projects were previously analyzed in the certified FEIR. (See Section 4, Cumulative Impact Analysis, of the RDEIR.) The County of Riverside Board of Supervisors certified the FEIR on October 24, 2017. Subsequently, in the case titled *Cherry Valley Pass Acres and Neighbors and Environmental Planning Group v. the County of Riverside*, the Court required the County to (1) further analyze the project's projected transportation energy use requirements, including its overall use of efficient transportation alternatives; and (2) address SCAQMD's recommendation to maximize the use of solar panels and provide an explanation as to why the mitigation measure was not adopted. The Court further ordered that (1) the remainder of the FEIR certified on October 24, 2017, is in full compliance with CEQA and remains certified, and (2) the project approvals are valid and shall remain in place. This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted.

<sup>9</sup> Riverside County Transportation Commission. 2019. Reimagine Your Commute with Ridesharing. Website: <https://www.rctc.org/rideshare-week-2019/>. Accessed February 7, 2020.

<sup>10</sup> IE511. 2020. Inland Empire Commuter Incentives. Website: <https://www.ie511.org/rideshare/incentives>. Accessed February 7, 2020.

*Response to UREMOVIC-5*

This comment pertains to cumulative projects in the area. Please refer to Response to UREMOVIC-4.

*Response to UREMOVIC-6*

The comment pertains to zoning.

Impacts related to land use and zoning issues were previously analyzed in the certified FEIR. (See Section 3.10, Land Use and Planning, of the RDEIR). This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted.

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**From:** sw072153@aol.com  
**Sent:** Tuesday, December 31, 2019 12:33 PM  
**To:** Dawson, Brett  
**Subject:** Gateway Warehouse Project

**CAUTION:** This email originated externally from the **Riverside County** email system.  
**DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Dawson,  
As previously stated re this EIR nonsense, they/you are trying to put lipstick on a pig, which is probably being unkind to pigs !  
Presumably you and your family breathe the Riverside County air which is the second most polluted in the USA.  
When the "project" is built there will be minimal , if any, monitoring of idling diesel trucks by the thousand and enforcement will add up to a slap on the wrist.  
The feeble protests of those opposed to being choked to death by this monstrosity were brushed aside and if that adds up to a Happy New Year for you then I wish you one.  
However, I think we both know that this hideous blight on the landscape is no cause for celebration.  
Geoffrey Wilson, Beaumont.

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***Geoffrey Wilson (WILSON)***

*Response to WILSON-1*

The comment raises issues related to the potential air quality impacts of idling diesel trucks in Riverside County and their associated health impacts. An analysis of air quality emissions was previously provided in the San Geronio Crossing FEIR, certified by the Riverside Board of Supervisors on October 24, 2017. This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted.

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1-28-2020

RIVERSIDE PLANNING DEPARTMENT  
4080 LEMON STREET 12TH FLOOR  
RIVERSIDE, CA. 92501

JAMES WRIGHT  
10320 CALIMESA BLVD. #4  
CALIMESA, CA. 92320-2313

ATTN: MR. BRETT DAWSON, PROJECT PLANNER

RE: SAN GORGONIO CROSSING DRAFT SUPPLEMENTAL EIR NO. 534

DEAR MR. DAWSON:

THIS LETTER IS IN OPPOSITION TO DRAFT SUPPLEMENTAL EIR # 534 AND I TAKE THIS TIME TO RESERVE THE PRESENT AND FUTURE LEGAL DUE PROCESS RIGHTS FOR ME AND JANET MARTIN AND THE SENIOR RESIDENTS AND RESIDENTS AT RANCHO MOBILE HOME PARK.

I ASSERT THESE RIGHTS DUE TO THE DANGERS AND RISKS OF GATEWAY SAN GORGONIO CROSSING MEGA-WAREHOUSE PROJECT.

THE COUNTY AND THOSE WHO PREPARED THE ORIGINAL AND DRAFT SUPPLEMENTAL EIR # 534 DID NOT PROVIDE FOR THE HEALTH AND SAFETY ASPECTS OF THE RESIDENTS, MANY WHO HAVE SERIOUS HEALTH PROBLEMS ESPECIALLY HEART AND LUNG DISEASE WHICH MAKES THEM VULNERABLE AND BECAUSE OF THEIR HEALTH, THEY ARE SENSITIVE RECEPTORS.

NOR DID THEY PROPERLY DISCLOSE THE LOCAL ENVIRONMENTAL ( IMPACT EFFECTS ) OF THE ( OPERATIONAL ACTIVITIES ) OF THE DIESEL TRUCK TRAILERS, DIRECTLY ASSOCIATED WITH THE PROJECT THAT IS IN ( CLOSE PROXIMITY ) WITH RANCHO CALIMESA MOBILE HOME PARK.

THIS PROJECT IS A NIGHTMARE. WHY THE COUNTY AND ENGINEERS WHO PREPARED BOTH OF THE REPORTS DID NOT ACKNOWLEDGE THEM AND THEIR HEALTH AND PERSONAL SAFETY AND VALID LEGAL CONCERNS AND THEIR FUTURE QUALITY OF LIFE IS INEXCUSABLE. NO MENTION OF RANCHO CALIMESA MOBILE HOME PARK OR THE SMALL FIELD SEPARATING THE PARK WITH THE PROJECT SITE. CALIMESA BLVD. IS NOT NOTED EVEN THOUGH IT INTERSECTS CHERRY VALLEY BLVD. AND IS RELEVANT.

BY IGNORING THE RESIDENTS INTERFERES AND DENIES THEIR RIGHTS. THERE HAS NEVER BEEN A HEALTH STUDY DONE OF RANCHO CALIMESA MOBILE HOME PARK AND THE DESERVING RESIDENTS WHO LIVE THERE AND THE TOXIC EFFECTS OF THE OPERATIONAL ACTIVITIES OF THE DIESEL TRUCK-TRAILERS WHICH WILL BE DIRECTLY ASSOCIATED WITH THIS PROJECT.

THOSE WHO PREPARED AND IGNORED THESE WONDERFUL RESIDENTS ARE THOSE WHO ARE OBLIGATED TO AND HAVE A DUTY TO PROTECT THE RESIDENTS AS THEIR OVERVIEW OF THE SEVERITY OF OVERLOOKED ENVIRONMENTAL IMPACTS TO THEIR HEALTH ARE UNFAIR AND DETRIMENTAL TO THE FUTURE QUALITY OF THE RESIDENTS LIVES. I VEHEMENTLY ADVOCATED FOR THESE RESIDENTS IN FRONT OF THE BOARD OF SUPERVISORS BECAUSE THEY DESERVE IT.

THESE RESIDENTS HAVE WORKED HARD AND BUILT THIS COUNTRY, SERVED IN THEIR PROFESSION, SERVED IN OUR MILITARY, ARE GOLD STAR WIVES, ARE DISABLED, HAVE SERIOUS HEALTH PROBLEMS, HAVE A SPOUSE WHO IS SERIOUSLY ILL, ARE ON FIXED INCOMES AND THIS PUTS THEM AT RISK AS THE PLANNERS KNEW OR SHOULD HAVE KNOWN THAT PUTTING A PREDATORY DEVELOPMENT NEAR THEM LIMITS THEIR ABILITY TO COPE WITH THE PHYSICAL AND EMOTIONAL STRESS ASSOCIATED WITH THE DANGERS AND RISKS OF THIS

PROJECT. AND THE PEOPLE WHO SHOULD REVIEWED THE EIR'S DID NOT SEE THE VERY REAL ENVIRONMENTAL THREATS AGAINST OUR SENIOR COMMUNITY NEED TO MAKE THIS RIGHT. OTHERWISE IT LEAVES THEM IN A VUNERABLE AND UNTENABLE POSITION.I KNOW AND LOVE THE SENIOR RESIDENTS AND RESIDENTS OF RANCHO CALIMESA MOBILE HOME PARK. THAT IS WHY I AM WRITING THIS LETTER.

2  
CONT

THIS IS ENVIRONMENTAL JUSTICE. AND THERE ARE NO PROVISIONS IN THE EIR'S FOR THESE RESIDENTS PROTECTION. IT IS BECAUSE NO ONE THOUGHT ENOUGH ABOUT THEM TO INCLUDE THEIR LIVES AND SAFETY WHEN THERE IS A RICH DEVELOPER NEXT DOOR. THE COUNTY AND PLANNERS SHOULD HAVE BEEN MADE THE HEALTH AND SAFETY A PARAMOUNT CONCERN, AND PROTECT WELFARE AND DIGNITY, IN THE INTEREST OF JUSTICE.

3

IT IS AGAINST THE STATE AND FEDERAL LAW AND CIVIL RIGHTS FOR THE COUNTY AND THE PLANNERS OF THE EIR'S TO DISCRIMINATE AGAINST OUR SENIOR RESIDENTS AND DISABLED. THEY ARE PROTECTED BY THE STATE OF CALIFORNIA FROM BREACHES AND INTENTIONAL WRONG DOING OF A CIVIL WRONG, LIKE ILL WILL OR THE TOTAL DISREGARD FOR OTHERS WELL BEING.

THE COUNTY AND PLANNERS LEFT OUT RELEVANT INFORMATION LIKE A WHOLE SENIOR COMMUNITY WITH SENSITIVE RECEPTORS, BLURRED MAP EXHIBITS THAT DON'T SHOW STEETS THAT ARE RELEVANT AND MAKE THIS PROJECT LOOK LIKE IT WOULD NOT NEGATIVELY IMPACT THE SURROUNDING POPULATED AREAS AROUND THIS PROJECT. IT IS MISLEADING AND JUST WRONG.

THE COURT ORDERED THAT THE PROJECTS EIR DESCRIBE, WERE RELEVANT, THE WASTEFUL, INEFFICIENT, AND UNECESSARY CONSUMPTION OF ENERGY CAUSED BY A PROJECT. PER APPENDIX F, POTENTIALLY SIGNIFICANT ENERGY IMPLICATIONS OF A PROJECT SHALL BE CONSIDERED IN A EIR TO THE EXTENT RELEVANT TO THE PROJECT.

AS I MENTIONED BEFORE, THE FINAL EIR OR THE DRAFT EIR NEVER DEFINED OR DISCLOSED THE RELEVANT ( LOCAL ENVIROMENTAL ) IMPACT EFFECTS OF THE ( OPERATIONAL ACTIVITIES ) OF THE DIESEL TRUCK-TRAILERS, DIRECTLY ASSOCIATED WITH THE PROJECT, THAT IS IN ( CLOSE PROXIMITY ) WITH RANCHO CALIMESA MOBILE HOME PARK.

4

AND BECAUSE THEY HAD A DUTY TO RECOGNIZE THE PRESENCE OF THE HUNDREDS OF SENIOR RESIDENTS AND RESIDENTS OF THE PARK, THE COUNTY PLANNERS AND ENGINEERS WHO PREPARED THE FINAL EIR AND THE SUPPLEMENTAL DRAFT EIR BREACHED THEIR DUTY TO DIRECTIVES TO INCLUDE ALL RELEVANT AND SIGNIFICANT ENERGY IMPLICATIONS TO BE PUT IN THAT EIR, AS ORDERED BY THE COURT.

MY POINT IS THIS, THEY KNEW OR SHOULD HAVE KNOWN THAT THIS PROJECT CAME WITH INHERENT RISKS TO THE PUBLIC, AND THE EIR IS THERE TO DESCRIBE ALL ASPECTS OF ENVIRONMENTAL CONCERNS. THE COUNTY PLANNING DEPARTMENT AND ITS ENGINEERS, THE COUNTY SUPERVISORS KNEW OR SHOULD HAVE KNOWN ALL IMPLICATIONS ASSOCIATED WITH THE EIR'S OF THIS PROJECT.

ALSO I CONTEND THE THE ( LOCAL ENVIRONMENTAL ) IMPACT EFFECTS OF THE PROJECT WOULD PUT THE ( OPERATIONAL ACTIVITIES ) OF THE DIESEL TRACTOR-TRAILERS RIGHT IN FRONT OF RANCHO CALIMESA MOBILE HOME PARK WHEN STACKED IN FRONT OF THE PARK WAITING TO MOVE FORWARD TO DELIVER THE CONTENTS OF THEIR TRAILER TO THE MEGA-WAREHOUSE. I ALSO ASSERT

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CONT

THAT THE FINAL EIR AND THE SUPPLEMENTAL DRAFT EIR BY OMISSION DID NOT LEGALLY ADDRESS THE OPERATIONAL ENVIRONMENTAL EFFECTS OF EACH TRUCK WITH A TRAILER INBOUND TO THE WAREHOUSE THECNICALLY IS THE PROJECT DUE TO THE CONTENTS OF THE TRUCK-TRAILER AND IF IT HAS NOT ARRIVED AT THE WAREHOUSE BUILDING, THEN THIS SHOULD HAVE BEEN PUT IN THE EIR'S. ALSO, ANY AND ALL TOXIC POLLUTION GENERATED BY THE ( PROJECT ) IS ENVIRONMENTAL AND A DETRIMENT TO THE COMMUNITY OF RANCHO CALIMESA MOBILE HOME PARK AND ITS SENSITIVE RECEPTORS AND ALL RESIDENTS. THE PLANNERS NEVER DESCRIBED THE ADVERSE AFFECTS THIS PROJECT WOULD POSE TO THE RESIDENTS OF RANCHO CALIMESA LIKE THE WAREHOUSE WILL OPERATE 24 HOURS A DAY WITH TRUCK-TRAILERS LINING UP AND DOWN CALIMESA BLVD. AND CHERRY VALLEY BLVD. WAITING TO GET TO THE WAREHOUSE. THE EIR DID NOT MENTION THAT TRUCK MAYBE 600 A DAY WILL EMIT DANGEROUS FUMES INTO THE AIR ( DIESEL PARTICULATE ), NOX AND ROG GASES AND CARBON MONOXIDE, DEADLY FOR THE SENSITIVE RECEPTORS AND ALL WHO BREATH IT. AND AT ANY GIVEN MOMENT WITH HUNDREDS OF TRUCKS, THEIR PRESENCE WILL BE IN FRONT OF THE WHOLE PARK AND ON THE RIGHT SIDE OF THE PARK SEPARATED BY A SMALL FIELD AND ON CHERRY VALLEY BLVD.

WITH ALL THE BIG RIGS COMING IN AND OUT OF THE WARHOUSE, WILL KEEP THE TOXIC FUMES STAGNATING AROUND AND ABOVE THE WAREHOUSE. THEN WHEN AN OFFSHORE AIR FLOW COMPRESSES THE AIR, ( SANTA ANNA ) THE WIND FORCES THE POLLUTION INTO FIRST RANCHO CALIMESA, AND INTO POPULATED CALIMESA.

WITH THE HUNDREDS AND THOUSANDS ( CUMULATIVE ) OF BIG RIGS STAGE ( WAIT IN LINE ), ONE AFTER ANOTHER WILL CONTAMINATE THE PROPERTY, PLANT AND WILD LIFE. AND ENGINES AND TRUCK TRANSMISSIONS DRIP ONTO THE ROADS AND WHEN DRY WILL POLLUTE WITH TOXIC DUST THAT OUR SENIORS CAN BREATHE.

THERE ARE OTHER DANGERS LIKE SENIORS NOT BEING ABLE TO SEE AROUND THE BIG RIGS AND THE DISRUPTION OF WAITING BEHIND AND NOT BE ABLE TO MOVE IN TRAFFIC BECAUSE BIG RIGS WILL LINE UP AND DOWN OUR STREETS ACCIDENTS CAN OCCUR AND COULD BLOCK THE SAFE EVACUATION OF RANCHO CALIMESA RESIDENTS IN A PARK FIRE EVENT, AS WE ARE IN A HIGH SEVERITY HAZARD ZONE.

FOR ALL THESE REASONS THAT WILL BE DANGEROUS TO RANCHO CALIMESA SENIOR RESIDENTS AND ALL RESIDENTS THE FINAL AND SUPPLEMENTAL DRAFT EIR'S BY NOT MENTIONING THE RESIDENTS AS REQUIRED TO DESCRIBE RELEVANT IMPLICATIONS AFFECTING THESE RESIDENTS AND THEIR HEALTH AND SAFETY.

THE EIR'S AS CURRENTLY WRITTEN ARE INACCURATE AND NEED TO REVISED TO REFLECT THE TRUTH. A HEALTH SUMMARY NEEDS TO BE COMPLETED TO SHOW THE IMPACT ON RANCHO CALIMESA SENIOR RESIDENTS AND ALL RESIDENTS AND SHOW THE ( CUMULATIVE HEALTH RISKS ) OF CURRENT AND LONG TERM EXPOSURE OF ALL ASPECTS OF THE POLLUTION FROM THE BIG RIGS DIESEL EXHAUSTS ( PARTICULATE MATTER ) AND HOW IT WOULD AFFECT THEIR HEALTH. NO ONE HAS CARED ENOUGH TO DO THIS FOR THESE CITIZENS AND IT IS TIME. NOW TO DO SO. A HEALTH STUDY NEEDS TO BE DONE TO BE FAIR.

I HOPE I ARTICULATED THESE POINTS ENOUGH TO ENSURE OUR SENIORS WILL NEVER BE PUT IN A ATMOSPHERE OF DANGER EVER AGAIN. THANK-YOU.

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### **James Wright (WRIGHT)**

#### *Response to WRIGHT-1*

The comment questions the analysis of potential health and safety impacts on sensitive receptors. These issues were previously analyzed in the certified FEIR, which determined that the project would not result in health risks to sensitive receptors, including seniors and children. (See RDEIR Pages 3.3-24 to 3.3-25 and 3.3-54 to 3.3-59; RDEIR Appendix B.1.) Further, RDEIR Section 3.3, Air Quality, Page 3.3-16 identified the closest existing residences as those located near the southeast corner of the project along Cherry Valley Boulevard. In addition, several areas adjacent to the project site are zoned for residential development. The shortest distances to any existing or proposed sensitive receptor is 25 meters, as future residences located within the proposed Sunny Cal Specific Plan are directly across Cherry Valley Boulevard (south of the project site). These residences are much closer to the project than the Rancho Calimesa Mobile Home Park which is located over 200 meters northwest of the project site. Thus, analysis of the Rancho Calimesa Mobile Home Park was effectively considered since its location is farther than the nearest sensitive receptors to the project site.

The County of Riverside Board of Supervisors certified the FEIR on October 24, 2017. Subsequently, in the case titled *Cherry Valley Pass Acres and Neighbors and Environmental Planning Group v. the County of Riverside*, the Court required the County to (1) further analyze the project's projected transportation energy use requirements, including its overall use of efficient transportation alternatives; and (2) address SCAQMD's recommendation to maximize the use of solar panels and provide an explanation as to why the mitigation measure was not adopted. The Court further ordered that (1) the remainder of the FEIR certified on October 24, 2017, is in full compliance with CEQA and remains certified, and (2) the project approvals are valid and shall remain in place. This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted.

#### *Response to WRIGHT-2*

This comment claims that potential environmental impacts on the residents of Rancho Calimesa Mobile Home Park were not disclosed, particularly those associated with operational activities of the diesel truck trailers. Please refer to Response to WRIGHT-1. Furthermore, potential impacts related to operational activities and diesel truck trailers were previously analyzed in certified FEIR. (RDEIR Section 3.3, Air Quality.)

#### *Response to WRIGHT-3*

This comment states a general concern that the environmental analysis discriminates against senior residents and disabled persons and that there are no provisions in the RDEIR, FEIR, and/or Draft SEIR for these residents' protection. The comment does not identify reasons why it believes the analysis is inherently discriminatory.

Please refer to Response to WRIGHT-1. It should also be noted that the certified FEIR previously analyzed the project's potential significant effects on sensitive receptors, including on senior citizens and children. All feasible mitigation measures are required to be implemented in order to reduce or avoid significant effects. This comment does not address the additional analysis required by the Court and contained in the Draft SEIR. Therefore, no further analysis or response is warranted.

*Response to WRIGHT-4*

This comment reiterates that potential environmental impacts on the residents of Rancho Calimesa Mobile Home Park were not disclosed related to the operational activities of the diesel truck trailers. Please refer to Response to WRIGHT-2. Moreover, consistent with the Court's order, this Draft SEIR Section 2.2 analyzes the project's transportation energy use requirements, including its overall use of efficient transportation alternatives consistent with the State CEQA Guidelines, and determined that transportation-related energy usage would not be wasteful, inefficient, or unnecessary.

*Response to WRIGHT-5*

This comment states that the environmental analysis did not consider the residents of Rancho Calimesa Mobile Home Park.

Please refer to Response to WRIGHT-1. The commenter also states that operational activities and diesel truck trailer activities and emissions were not analyzed. Please refer to Response to WRIGHT-2.

*Response to WRIGHT-6*

This comment requests that the environmental analysis be redone, and a health summary completed on the potential impacts on the Rancho Calimesa Mobile Home Park.

A health risk assessment was previously prepared for the project and was included as Appendix B of the certified FEIR. Please also refer to Response to WRIGHT-1.

## SECTION 3: ERRATA

There were no revisions to the Draft Supplemental EIR (Draft SEIR) for the San Geronio Crossing Project (Project) that were requested or that were necessary.

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