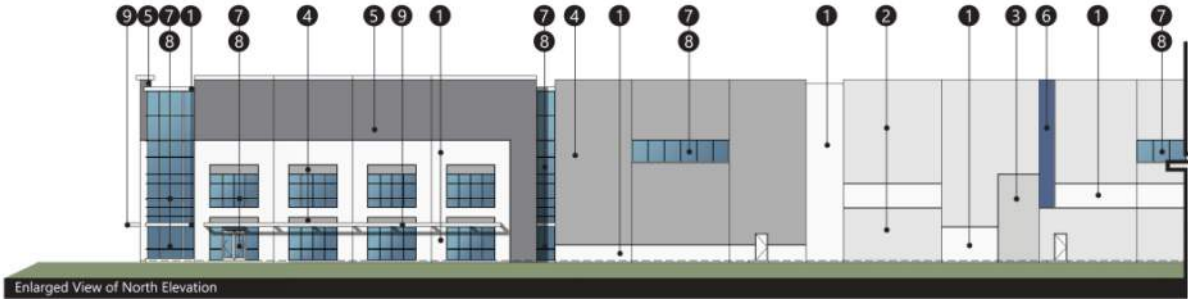

Homestead Industrial Project

Final Environmental Impact Report
State Clearinghouse No. 2019090335

prepared by

City of Eastvale
Planning Department
12363 Limonite Avenue, Suite 910
Eastvale, California 91752
Contact: Gina Gibson-Williams, Community Development Director

prepared with the assistance of

Rincon Consultants, Inc.
901 9th Street, Suite 109
Redlands, California 92374

March 2020

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
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Table of Contents

Appendices

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1 Introduction

This Final Environmental Impact Report (Final EIR) is an informational document prepared by the City of Eastvale (City) to evaluate the potential environmental impacts of the proposed Homestead Industrial project (project or proposed project). The primary objectives of the EIR process under the California Environmental Quality Act (CEQA) are to inform decision-makers and the public about a project's potentially significant environmental effects, identify feasible ways to minimize significant effects, and consider a reasonable range of alternatives to the project. This Final EIR has been prepared with assistance from the City's planning and environmental consultant, Rincon Consultants, Inc. The Final EIR has been reviewed by City staff for completeness and adequacy in accordance with Public Resources Code (PRC) Sections 21000–21177 and the State CEQA Guidelines. The EIR becomes final upon certification by the City's decision-making body, consequently.

1.1 Final EIR Contents

As prescribed by the California Environmental Quality Act (CEQA) Guidelines Sections 15088 and 15132, the lead agency, the City of Eastvale, is required to evaluate comments on environmental issues received from persons who have reviewed the Draft EIR and to prepare written responses to those comments. This document, together with the Draft EIR (incorporated by reference) comprise the Final EIR for this project. This Final EIR includes individual responses to each letter received during the public review period for the Draft EIR. In accordance with CEQA Guidelines Section 15088(c), the written responses describe the disposition of significant environmental issues raised.

The City of Eastvale has provided a good faith effort to respond to all significant environmental issues raised by the comments. The Final EIR also includes amendments to the Draft EIR consisting of changes suggested by certain comments, as well as minor clarifications, corrections, or revisions to the Draft EIR. The Final EIR includes the following contents:

- Section 1: Introduction
- Section 2: Responses to Comments on the Draft EIR; which also includes a list of all commenters and public comment letters
- Section 3: Errata to the Draft EIR
- Appendices

1.2 Draft EIR Public Review Process

According to CEQA, lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the Draft EIR.

1.2.1 Notice of Preparation and Project Scoping

On September 16, 2019, the City of Eastvale circulated a Notice of Preparation (NOP) for a 30-day period to identify environmental issue areas potentially affected if the proposed project were to be implemented. As discussed in Section 1.3 of the Draft EIR, the NOP was posted with the County

Clerk, mailed to public agencies, the State Clearinghouse, organizations, and individuals considered likely to be interested in the proposed project and its potential impacts, and posted in the local newspaper, the Press Enterprise. Comments received by the City of Eastvale on the NOP are summarized in Table 1-1 of the Draft EIR. These comments were considered during the preparation of the Draft EIR.

1.2.2 Public Review of the Draft EIR

The Draft EIR was made available for public review on January 23, 2020 and was distributed to local and State responsible and trustee agencies. Copies of the Notice of Availability (NOA) of the Draft EIR were mailed to a list of interested parties, groups and public agencies, as well as property owners and occupants of nearby properties. The Draft EIR and an announcement of its availability were posted electronically on the City's website, and paper copies were available for public review at Eastvale City Hall and Eastvale Public Library (located at 7447 Scholar Way). The Notice of Availability of the Draft EIR was also posted at the office of the Riverside County Clerk.

The 45-day CEQA public comment period began on January 24, 2020 and ended on March 10, 2020. The City of Eastvale received nine comment letters on the Draft EIR prior to the close of the public comment period and one after the close of the public comment period. Copies of all written comments on the Draft EIR received are included in Section 2.0 of this document, as are responses to those comments.

1.3 EIR Certification Process and Consideration of the Project

In accordance with the requirements of CEQA, and the procedures of Eastvale, the EIR must be certified as complete and adequate prior to any potential final action on the proposed project. Once the EIR is certified and all information considered, using its independent judgment, the City can choose to take no action, or to take action to go forward with the proposed project, make changes, or select an alternative to the proposed project. While the information in the EIR does not constrain the City's ultimate decision under its land use authority, the Eastvale must respond to each significant effect and mitigation measure identified in the EIR as required by CEQA by making findings supporting its decision.

1.4 Draft EIR Recirculation Not Required

CEQA Guidelines Section 15088.5 requires Draft EIR recirculation when "significant new information." Significant new information is defined as including:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
4. The Draft EIR is so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The comments, responses, and Draft EIR amendments presented in this document do not constitute such "significant new information;" instead, they clarify, amplify, or make insignificant modifications to the Draft EIR. For example, none of the comments, responses, and Draft EIR amendments disclose new or substantially more severe significant environmental effects of the proposed project, or new feasible mitigation measures or alternatives considerably different than those analyzed in the Draft EIR that would clearly lessen the proposed project's significant effects.

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2 Response to Comments

This section includes comments received during the circulation of the Draft EIR prepared for the proposed project.

The Draft EIR was circulated for a 45-day public review period that began on January 24, 2020 and ended on March 10, 2020. The City of Eastvale received 10 comment letters on the Draft EIR. The commenters and the page number on which each commenter's letter appear are listed below.

The comment letters and responses follow. The comment letters have been lettered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the letter of the comment letter, and then the number assigned to each issue (Response A-1, for example, indicates that the response is for the first issue raised in comment Letter A).

Where a comment resulted in a change to the Draft EIR text, a notation is made in the response indicating that the text is revised. Changes in text are signified by strikeouts (~~**strikeouts**~~) where text is removed and by underlined font (**underlined font**) where text is added. These changes in text are also included in Section 3, *Errata to the Draft EIR*.

In support of the responses provided in the section, as well as the revisions provided in Section 3, the following appendices have been included as part of this Final EIR:

- Appendix 4.13: Water Supply Assessment

From: Gonzalez Romero, Arysa (TRBL) <aromero@aguacaliente.net>
Sent: Friday, January 24, 2020 4:09 PM
To: Gina Gibson-Williams <ggibson-williams@eastvaleca.gov>
Subject: The Homestead Industrial Project (SCH No. 2019090335)

[The e-mail below is from an external source. Please do not open attachments or click links from an unknown or suspicious origin.]

Greetings,

A records check of the Tribal Historic preservation office's cultural registry revealed that this project is not located within the Tribe's Traditional Use Area. Therefore, we defer to the other tribes in the area. This letter shall conclude our consultation efforts.

A1

Thank you,

Arysa Gonzalez Romero
Historic Preservation Technician
Agua Caliente Band of Cahuilla Indians
5401 Dinah Shore Drive Palm Springs, CA 92264
D: 760-883-1327 | C: 760-831-2484

Letter A

COMMENTER: Arysa Gonzalez Romero, Historic Preservation Technician, Agua Caliente Band of Cahuilla Indians

Response A-1

The comment states that the project is not located within the Agua Caliente Band of Cahuilla Indians' Traditional Use Area and the letter shall conclude the consultation efforts with the Tribe.

This comment is acknowledged. The comment does not pertain to the adequacy of the EIR or the CEQA process. Therefore, no further response is required.

JASON E. UHLEY
General Manager-Chief Engineer

1995 MARKET STREET
RIVERSIDE, CA 92501
951.955.1200
FAX 951.788.9965
www.rcflood.org

RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

229424

January 30, 2019

City of Eastvale
Planning Department
12363 Limonite Avenue, Suite 910
Eastvale, CA 91752

Attention: Gina Gibson-Williams

Re: SCH 20190390335
Homestead Industrial Project

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases, or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided. B-1

The District's review is based on the above-referenced project transmittal, received January 24, 2020. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

☐ This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.

☐ This project involves District proposed Master Drainage Plan facilities, namely _____. The District will accept ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required.

☒ This project proposes channels, storm drains 36 inches or larger in diameter, or other facilities that could be considered regional in nature and/or a logical extension of the adopted Eastvale Master Drainage Plan. The District would consider accepting ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. B-2

☒ An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, Eastvale MDP Line F-3. For further information, contact the District's Encroachment Permit Section at 951.955.1266. B-3

January 30, 2020

City of Eastvale
Re: SCH 20190390335
Homestead Industrial Project

229424

☐ The District's previous comments are still valid.

GENERAL INFORMATION

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt. B-4

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy. B-5

If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit. B-6

Very truly yours,

Deborah de Chambeau

DEBORAH DE CHAMBEAU
Engineering Project Manager

c: Riverside County Planning Department
Attn: Jason Killebrew

SLJ:blm

Letter B

COMMENTER: Deborah de Chambeau, Engineering Project Manager, Riverside County Flood Control and Water Conservation District (District)

Response B-1

The comment provides introductory information regarding the District and limitations of the review provided by the District.

The comment does not pertain to the adequacy of the EIR or the CEQA process. Therefore, no further response is required.

Response B-2

The comment states that the project includes drainage facilities that could be regional in nature or an extension of the Eastvale Master Drainage Plan, and further states that the District would consider for ownership by request, and if facilities conform to District standards.

The project includes drainage facilities in accordance with the Master Drainage Plan. The District's interest and requirements related to these facilities in acknowledged, and will be presented for review and consideration by the City's decision-making body. The comment does not pertain to the adequacy of the EIR or the CEQA process. Therefore, no further response is required.

Response B-3

The comment states that an encroachment permit is required for construction related activities occurring with District right of way or facilities, namely Eastvale MDP Line F-3, and provides the contact information.

This comment is acknowledged. The comment does not pertain to the adequacy of the EIR or the CEQA process. Therefore, no further response is required.

Response B-4

The commenter states that the project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board for grading, recordation, or other activities.

As discussion in Section 4.7, *Hydrology and Water Quality*, the project is subject to the NPDES Statewide General Construction Activity stormwater permit, and would implement a project-specific Water Quality Management Plan.

Response B-5

The comment provides information about the requirements if the project involves a Federal Emergency Management Agency (FEMA) mapped floodplain.

As stated in Draft EIR Section 4.7, *Hydrology and Water Quality*, the project site is located in Zone X, an area of minimal flood hazard designated by FEMA (FEMA 2008). Proposed storm drains included in the project are included in the Eastvale Master Drainage Plan and an encroachment permit would be required. Primary flood risk areas in Eastvale are concentrated along the Santa Ana River in the

southern portion of the city. No portion of Eastvale is located in a potential inundation area for seismic or geologic dam failure (Eastvale 2012).

Response B-6

The comment provides information about the requirements if the project impacts a natural watercourse or mapped floodplain.

As stated in Section 4.3, *Biological Resources*, the majority of the project site does not support any discernible drainage courses, inundated areas, wetland vegetation, or hydric soils that would be considered jurisdictional. A water detention basin on-site appears to capture artificial flows from dairy farm activities and runoff during storm events. Since the detention basin is located wholly in the uplands for dairy farm activities, does not connect to Cucamonga Creek, and does not support riparian vegetation, it would not be considered jurisdictional. Additionally, the project site does not contain wetlands considered jurisdictional or qualify as riparian/riverine habitat under the Multiple Species Habitat Conservation Plan (MSHCP). The project would not impact any jurisdictional water features and therefore would not be subject to these requirements.

gg @ g

C-1

C-2

Letter C

COMMENTER: Eddie Rhee, Engineering Manager, Operations Division, Jurupa Community Services District (JCSD)

Response C-1

The comment provides introductory text regarding the JCSD and summarizes the agency's capacity as a Responsible Agency regarding potential impacts to water and wastewater services and facilities.

This comment is acknowledged. The comment does not pertain to the adequacy of the EIR or the CEQA process. Therefore, no further response is required.

Response C-2

The comment notes that a Water Supply Assessment (WSA) as required by Senate Bill 610 was not included in the Draft EIR, and requests that the WSA approved by the agency on February 24 is included in the Final EIR. The comment provided the approved WSA as an attachment.

The WSA is included in the Final EIR, and provided herein as Appendix 4.13, *Water Supply Assessment*.

Response C-3

The commenter states the agency agrees with the conclusions of the Draft EIR regarding the Jurupa Community Services District's water supply.

This comment is acknowledged. The comment does not pertain to the adequacy of the EIR or the CEQA process. Therefore, no further response is required.

CITY OF ONTARIO
303 EAST "B" STREET, CIVIC CENTER ONTARIO CALIFORNIA 91764-4105
(909) 395-2000
FAX (909) 395-2070

March 5, 2020

City of Eastvale
Gina Gibson-Williams, Planning Department
12363 Limonite Avenue, Suite 910
Eastvale, California 91752

RE: NOTICE OF AVAILABILITY OF A DEIR FOR PROPOSED HOMESTEAD INDUSTRIAL PROJECT LOCATED IN THE CITY OF EASTVALE

Ms. Williams,

Thank you for allowing the City of Ontario an opportunity to review and comment on the above referenced project. After reviewing the Notice of Availability, the City requests that the following comment be addressed:

- The City of Chino is eliminating Kimball Avenue west of Hellman Avenue from their truck route. Please address the impact this has on the truck circulation, particularly on Merrill Avenue. D-1
- All intersection analysis locations in the City of Ontario are included in the City's Development Impact Fee (DIF) program. D-2
- Coordinate street improvements on Archibald with the City of Ontario to address the pinch point located adjacent to the County Line Channel. D-3

We appreciate being involved in the environmental review of the project and look forward to continued communications regarding this project. If you have any questions regarding our comments, please contact me at (909) 395-2421.

Sincerely,

Cathy Wahlstrom
Planning Director

Letter D

COMMENTER: Cathy Wahlstrom, Planning Director, City of Ontario

Response D-1

The comment states that the City of Chino is eliminating Kimball Avenue west of Hellman Avenue from its truck route and requests the impact of this change on truck circulation be evaluated, particularly at Merrill Avenue.

The City of Eastvale's gap closure project of Limonite Avenue (bridge over the Cucamonga Creek) is estimated to be completed by interim year 2023. The Traffic Impact Analysis (TIA) estimates that five percent of the total truck traffic generated to use Kimball Avenue (between Hellman Avenue and Euclid Avenue (State Route 83) beginning in the interim year (see Draft EIR, Appendix 4.11, Exhibit 4-4, page 83). When Chino removes this section of Kimball Avenue from the truck route system, the five percent using Kimball Avenue would turn left on Hellman Avenue then turn right on Pine Avenue to reach the regional highway system (e.g., State Routes 71 and 91). This maintains consistency with truck distributions for the region and no additional analysis is required for the project.

Response D-2

The comment states that all intersection analysis locations in the City of Ontario are included in the City's Development Impact Fee (DIF) program.

This comment is acknowledged. The intersections analyzed in the TIA which are located in the City of Ontario are in the City's DIF program.

Response D-3

The comment requests that street improvements on Archibald Avenue are coordinated with the City of Ontario to address the pinch point located adjacent to the County Line Channel.

As requested, the City of Eastvale will coordinate with Ontario regarding improvements at this location. This comment does not pertain to the adequacy of the EIR or the CEQA process. Therefore, no further response is required.

March 10, 2020

Gina Gibson-Williams
Community Development Director
City of Eastvale
12363 Limonite Avenue
Eastvale, California 91752

Dear Gina Gibson-Williams:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Homestead Industrial Project (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2019090335. The project includes the development of 6 industrial-use buildings totaling 1,080,060 square feet. Once in operation, the Project would introduce up to 2,102 daily vehicle trips, including 408 daily heavy-duty truck trips, along local roadways. The Project is located within the City of Eastvale (City), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

The industrial uses proposed under the Project would permit warehousing and distribution facilities. Freight facilities, such as warehouse and distribution, can result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment (e.g., forklifts, yard tractors, etc.) which emit toxic diesel emissions and contribute to regional air pollution and global climate change.[1] CARB has reviewed the DEIR and is concerned about the air pollution impacts that would result should the City approve the Project.

E-1

I. The Project Would Increase Exposure to Air Pollution in Disadvantaged Communities

The Project, if approved, will expose nearby disadvantaged communities to elevated levels of air pollution. Residences are located northeast and south of the Project with the closest residences located approximately 280 feet from the Project's northeastern boundary. In addition to residences, two schools (Rosa Parks Elementary School and Dr. Augustine Ramirez Intermediate School) are located within 1 mile of the Project area. The community is surrounded by existing toxic diesel particulate matter (diesel PM) emission sources, which include existing industrial sources and vehicular traffic along Interstate 15 (I-15). Due to the Project's proximity to residences and

[1] With regard to greenhouse gas emissions from this project, CARB has been clear that local governments and project proponents have a responsibility to properly mitigate these impacts. CARB's guidance, set out in detail in the Scoping Plan issued in 2017, makes clear that in CARB's expert view local mitigation is critical to achieving climate goals and reducing greenhouse gases below levels of significance.

schools already disproportionately burdened by multiple sources of air pollution, CARB is concerned with the potential cumulative health impacts associated with the construction and operation of the Project.

The State of California has placed additional emphasis on protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill 617 (AB 617) (Garcia, Chapter 136, Statutes of 2017). AB 617 is a significant piece of air quality legislation that highlights the need for further emission reductions in communities with high exposure burdens, like those in which the Project is located. Diesel PM emissions generated during the construction and operation of the Project would negatively impact the community, which is already disproportionally impacted by air pollution from existing industrial sources and traffic on I-15.

E-1

Through its authority under Health and Safety Code section 39711, the California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)). In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25 percent of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 3.0 (CalEnviroScreen). CalEnviroScreen uses a screening methodology to help identify California communities currently disproportionately burdened by multiple sources of pollution. The census tract containing the Project is within the top 20 percent for Pollution Burden[2] and is considered a disadvantaged community; therefore, CARB urges the City to ensure that the Project does not adversely impact neighboring disadvantaged communities.

[2] Pollution Burden represents the potential exposures to pollutants and the adverse environmental conditions caused by pollution.

II. It is Unclear Whether the Proposed Warehouse and Distribution Facilities Include Cold Storage

The air pollutant emissions reported in the DEIR were estimated under the assumption that the Project would not be used for cold storage. Since the Project description in the DEIR did not explicitly state that the proposed 1,080,060 square feet of warehousing, distribution, and retail uses would not include cold storage space, there is a possibility that trucks and trailers visiting the Project site would be equipped with transport refrigeration units (TRU).[3,4]

TRUs on trucks and trailers can emit large quantities of diesel exhaust while operating within the Project site. Residences and other sensitive receptors (e.g., daycare facilities, senior care facilities, and schools) located near where these TRUs could be operating would be exposed to diesel exhaust emissions that would result in significant cancer risk. CARB staff urges the applicant and City to revise the DEIR to clearly define the Project's description, so the public can fully understand the potential environmental effects of the Project on their communities. E-2

If the Project will not be used for cold storage, CARB staff urges the City to include one of the following design measures in the Final Environmental Impact Report (FEIR):

- A Project design measure requiring contractual language in tenant lease agreements that prohibits tenants from operating TRUs within the Project site; or

- A condition requiring a restrictive covenant over the parcel that prohibits the applicant's use of TRUs on the property unless the applicant seeks and receives an amendment to its conditional use permit allowing such use.

If the City does allow TRUs within the Project site, CARB staff urges the City to model air pollutant emissions from on-site TRUs in the FEIR, as well as prepare a health risk assessment (HRA) that shows the potential health risks. The FEIR should also include the air pollutant reduction measures listed in Attachment A.

---

[3] TRUs are refrigeration systems powered by integral diesel engines that protect perishable goods during transport in an insulated truck and trailer vans, rail cars, and domestic shipping containers.

[4] Project descriptions "must include (a) the precise location and boundaries of the proposed project, (b) a statement of the objectives sought by the proposed project, (c) a general description of the project's technical, economic and environmental characteristics, and (d) a statement briefly describing the intended use of the EIR." (*stopthemilleniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 16.) "This description of the project is an indispensable element of both a valid draft EIR and final EIR." (Ibid.) Without explicit acknowledgment in the project description that the proposed project will not include cold storage facilities, the current project description fails to meet the bare minimum of describing the project's technical and environmental characteristics.

III. The DEIR Fails to Include Enforceable Mitigation Measures to Reduce the Project's Air Pollutant Emissions

CARB is concerned about the overall lack of mitigation measures found in the DEIR. Without modeling the Project's mitigated operational air pollutant emissions, the DEIR concludes that the Project's operational emissions of nitrogen oxides (NO_x) will remain significant and unavoidable. The DEIR includes mitigation measures AQ-1 through AQ-4 to reduce the Project's operational NO_x emissions. These mitigation measures restrict truck idling to 5 minutes, encourage trucks visiting the facility to incorporate energy efficiency improvements, incorporate electric vehicle charging and carpooling, and provide infrastructure to support the use of electric-powered forklifts. Although the proposed mitigation measures listed in the DEIR would reduce the Project's operational NO_x emissions, more can be done. CEQA requires that all feasible mitigation measures be incorporated even where impacts will remain significant and unavoidable after mitigation (see California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). Therefore, as required under CEQA, the Project's mitigated air pollutant emissions should be quantified and reported in the FEIR, so the public has a better understanding of the potential impacts the Project will have on local air quality. In addition to the mitigation measures already in the DEIR, CARB strongly urges the City to implement the air pollutant emission reduction measures found in Attachment A.

E-3

IV. Conclusion

CARB is concerned about the Project's potential public health impacts and the lack of mitigation measures presented in the DEIR. The DEIR does not provide mitigation measures to reduce the Project's operational air pollution emissions, and does not evaluate the Project's potential air quality and health effects from on-site TRUs. CARB recommends that the City reanalyze the Project's air quality and health risk impacts that accounts for all on-site emission sources and include the air pollution emission measures provided in Attachment A in the FEIR.

E-4

Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not substantively submit comments.

CARB appreciates the opportunity to comment on the DEIR for the Project and can provide assistance on zero-emission technologies and emission reduction strategies, as needed. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist, at (916) 440-8242 or via email at stanley.armstrong@arb.ca.gov.

E-4

Sincerely,

Richard Boyd

Richard Boyd, Chief
Risk Reduction Branch
Transportation and Toxics Division

Attachment

cc: See next page.

cc: State Clearinghouse
P.O. Box 3044
Sacramento, California 95812

Carlo De La Cruz
Senior Campaign Representative
Sierra Club
714 West Olympic Boulevard, Suite 1000
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Riverside, California 92519

Stanley Armstrong
Air Pollution Specialist
Risk Analysis Section
Transportation and Toxics Division

ATTACHMENT A

Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers

The California Air Resources Board (CARB) recommends developers and government planners use all existing and emerging zero to near-zero emission technologies during project construction and operation to minimize public exposure to air pollution. Below are some measures, currently recommended by CARB, specific to warehouse and distribution center projects. These recommendations are subject to change as new zero-emission technologies become available.

Recommended Construction Measures

1. Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.

2. Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.

3. In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits such that emission reductions achieved equal or exceed that of a Tier 4 engine.

4. In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.

5. In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-NO_x standard starting in the year 2022.[1]

[1] In 2013, CARB adopted optional low-NO_x emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NO_x emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model year 2010 and later. CARB's optional low-NO_x emission standard is available at: https://www.arb.ca.gov/msprog/onroad/optionnox/optionnox.htm.

6. In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB is available to assist in implementing this recommendation.

Recommended Operation Measures

1. Include contractual language in tenant lease agreements that requires tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.

2. Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units. This requirement will substantially decrease the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included in lease agreements.[2]

3. Include contractual language in tenant lease agreements that requires all TRUs entering the project site be plug-in capable.

4. Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.

5. Include contractual language in tenant lease agreements requiring all TRUs, trucks, and cars entering the Project site be zero-emission.

6. Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available.

7. Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be model year 2014 or later, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2030.

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[2] CARB's Technology Assessment for Transport Refrigerators provides information on the current and projected development of TRUs, including current and anticipated costs. The assessment is available at: https://www.arb.ca.gov/msprog/tech/techreport/tru_07292015.pdf.

8. Include contractual language in tenant lease agreements that requires the tenant be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,[3] Periodic Smoke Inspection Program (PSIP),[4] and the Statewide Truck and Bus Regulation.[5]

9. Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than five minutes while on site.

10. Include contractual language in tenant lease agreements that limits on-site TRU diesel engine runtime to no longer than 15 minutes. If no cold storage operations are planned, include contractual language and permit conditions that prohibit cold storage operations unless a health risk assessment is conducted and the health impacts fully mitigated.

11. Include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.

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[3] In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation is available at: https://www.arb.ca.gov/cc/hdghg/hdghg.htm.

[4] The PSIP program requires that diesel and bus fleet owners conduct annual smoke opacity inspections of their vehicles and repair those with excessive smoke emissions to ensure compliance. CARB's PSIP program is available at: https://www.arb.ca.gov/enf/hdvip/hdvip.htm.

[5] The regulation requires that newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. CARB's Statewide Truck and Bus Regulation is available at: https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm.

Letter E

COMMENTER: Richard Boyd, Chief, Risk Reduction Branch, Transportation and Toxics Division of California Air Resources Board (CARB)

Response E-1

This comment provides an overview of the commenter's understanding of the project, characterization of the community's demographics, and general opinion regarding conclusions and mitigation measures in the Draft EIR. Specifically, the comment is concerned about air pollution impacts to disadvantaged communities that would result from project operations from heavy-duty diesel truck traffic and on-site diesel equipment associated with warehouse and distribution uses, and describes the need for further emissions reductions pursuant to Assembly Bill 617 (AB 617).

The project is not adjacent to any nearby disadvantaged community. The project is in the general vicinity of the Chino Municipal Airport and is immediately adjacent to over 20 million square feet of industrial development in the cities of Chino, Ontario, and Eastvale, including over 4 million square-feet of warehouse to the north, west, and east of the site in Eastvale. The project site has long carried a General Plan land use designation of Light Industrial (LI).

Notwithstanding, CEQA does not require an evaluation of environmental justice impacts. Rather, CEQA requires EIRs to analyze physical changes to the environment (14 Cal. Code Regs., Section 15131, subd. [a]). Economic and social effects in themselves do not constitute significant effects on the environment under CEQA (*Saltonstall v. City of Sacramento* [2015] 234 Cal.App.4th 549, 585; *Gray*, *supra*, 167 Cal.App.4th at pp. 1120–1121). The Draft EIR fully analyzed the project's physical impacts on the environment.

Notably, the comment is concerned with elevated levels of air pollution. However, scientific data demonstrates that air quality in the region has significantly improved in terms of both pollution levels and high pollution days over the past three decades. Air pollution, even with immense growth, is declining.

The project is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). In 1976, California adopted the Lewis Air Quality Management Act which created SCAQMD from a voluntary association of air pollution control districts in Los Angeles, Orange, Riverside, and San Bernardino counties. The geographic area of which SCAQMD consists is known as the South Coast Air Basin (SCAB). SCAQMD is in charge of creating comprehensive plans and regulatory programs for the region with a goal to ultimately attain federal standards.

SCAQMD rule development and implementation of programs through the 1970s and 1980s resulted in significant improvement in air quality within the SCAB. Nearly all control programs developed through the early 1990s relied on the following:

- The development and application of cleaner technology
- Add-on emission controls
- Uniform CEQA review throughout the SCAB

Industrial emission sources have been significantly reduced by this approach and vehicular emissions have been reduced by technologies implemented at the state-level by the California Air Resources Board (CARB) through incorporation of tailpipe emissions standards.

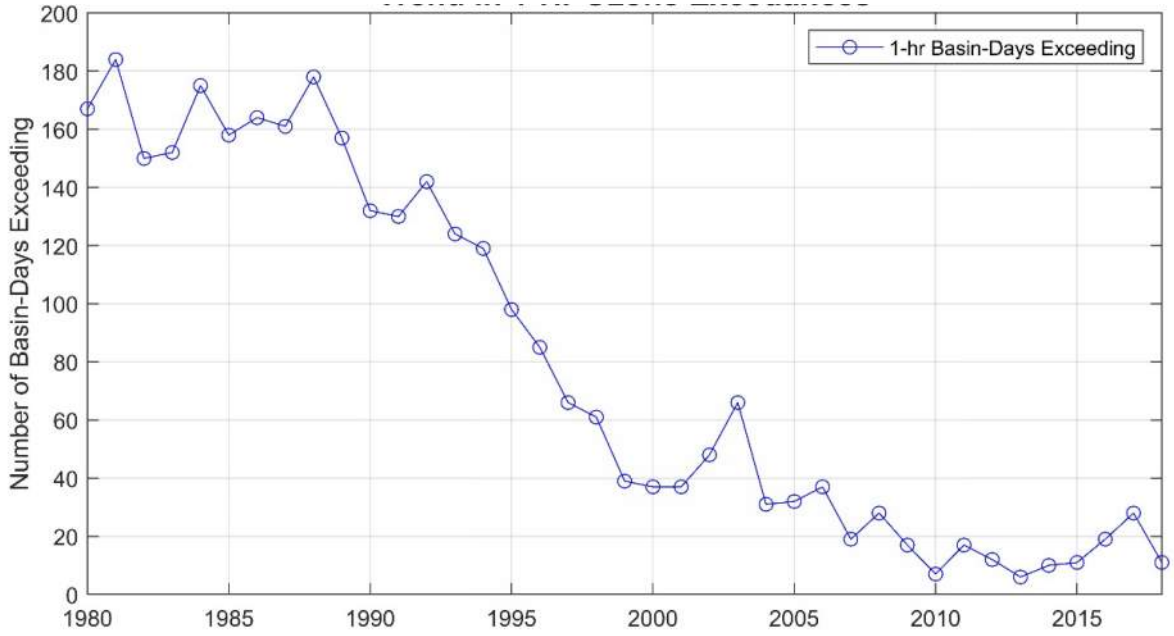
SCAQMD has adopted several Air Quality Management Plans (AQMPs) which represent a regional blueprint for achieving healthful air on behalf of over 16 million residents of the SCAB. The 2012 AQMP states:

> …the remarkable historical improvement in air quality since the 1970s is the direct result of Southern California's comprehensive, multiyear strategy of reducing air pollution from all sources as outlined in its AQMPs.

Emissions of O_3, NO_X, VOC, and CO have been decreasing in the SCAB since 1975. These decreases result primarily from motor vehicle controls and reductions in evaporative emissions. Although vehicle miles traveled (VMT) in the SCAB continue to increase, NO_X and VOC levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NO_X emissions from electric utilities have also decreased due to use of cleaner fuels and renewable energy.

Ozone (O_3) contour maps show that the number of days exceeding the 1-hour NAAQS has decreased between 1997 and 2018. By 2018, there is an overall decrease in exceedance days compared with the 1997 period. As shown in Graph 2-1, O_3 levels in the SCAB have decreased substantially over the last 30 years with the current maximum measured concentrations being approximately one-third of concentrations within the late 1970s.

Graph 2-1 Trend in 1-Hr Ozone Exceedances

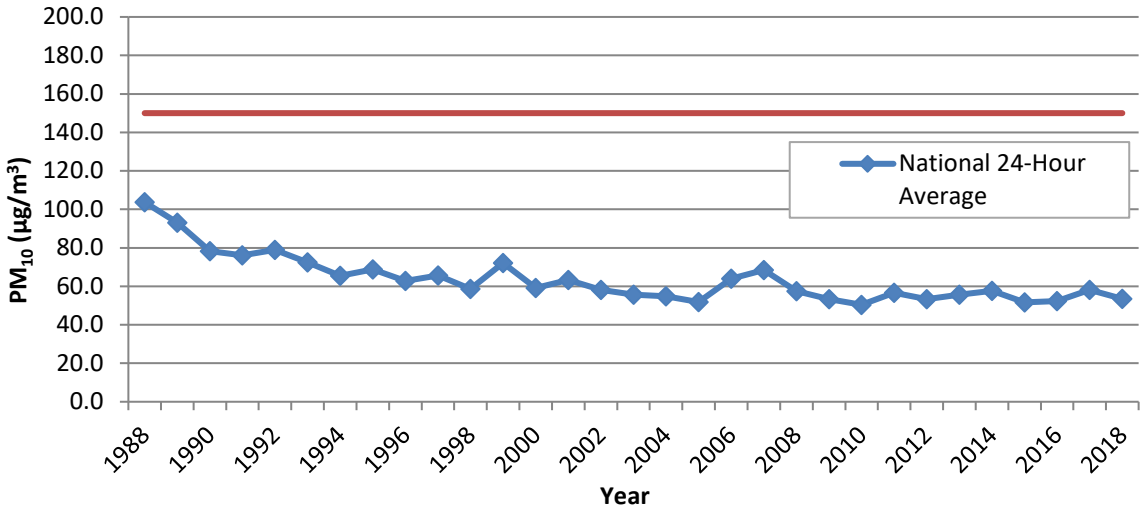


Source: SCAQMD at http://www.aqmd.gov/home/air-quality/historical-air-quality-data/historic-ozone-air-quality-trends

The overall trends of PM_{10} and $PM_{2.5}$ concentration levels in the air also show an overall improvement since 1988. As with other pollutants, the most recent PM_{10} statistics show an overall improvement as illustrated in Graph 2-2 and Graph 2-3. During the period for which data are available, the 24-hour national annual average concentration for PM_{10} decreased by approximately 48 percent, from 103.7 µg/m³ in 1988 to 53.5 µg/m³ in 2018. Although the values are below the federal standard, it should be noted that there are days within the year where the concentrations will exceed the threshold. The 24-hour state annual average for emissions for PM_{10}, have decreased

by approximately 53 percent since 1988. Although data in the late 1990s show some variability, this is probably due to the advances in meteorological science rather than a change in emissions. Similar to the ambient concentrations, the calculated number of days above the 24-hour PM_{10} standards has also shown an overall drop.

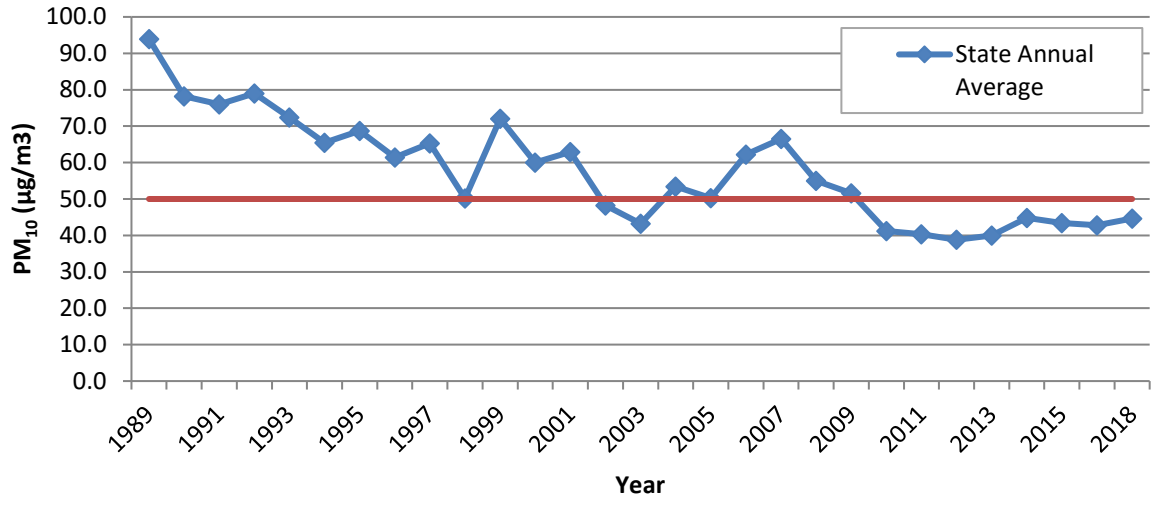
Graph 2-2 SCAB Average 24-Hour Concentration PM10 Trend (Based on Federal Standard)[1]



[1] The most recent year where 8-hour concentration data is available is 2012.

Source: CARB

Graph 2-3 SCAB Annual Average Concentration PM10 Trend (Based on State Standard)[1]

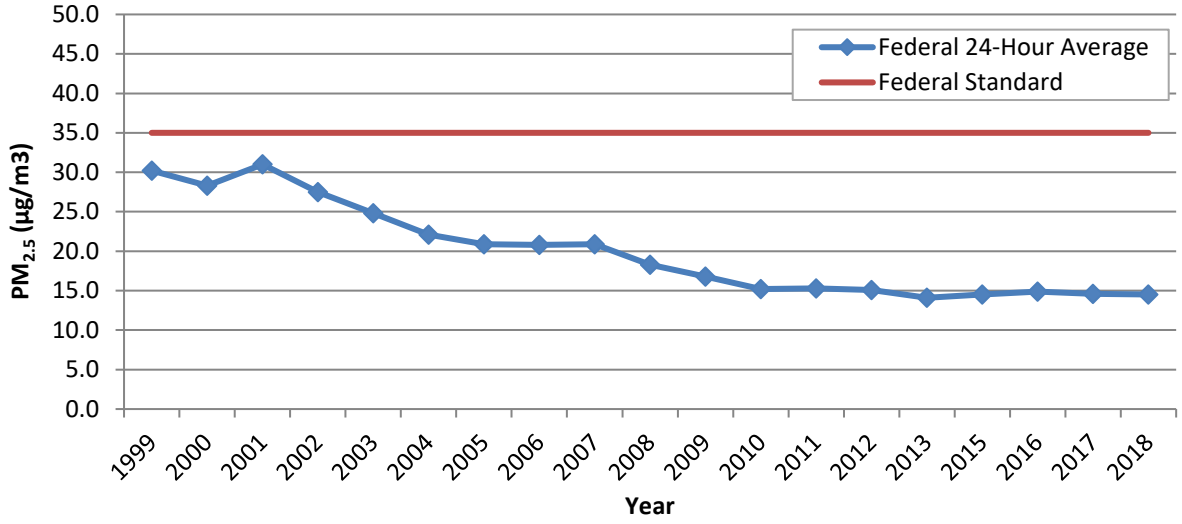


[1] The most recent year where 8-hour concentration data is available is 2012.

Source: CARB

Graph 2-4 and Graph 2-5 show the most recent 24-hour average $PM_{2.5}$ concentrations in the SCAB from 1999 through 2018. Overall, the national and state annual average concentrations have decreased by almost 52 percent and 33 percent respectively. The SCAB is currently designated as nonattainment for the state and federal $PM_{2.5}$ standards.

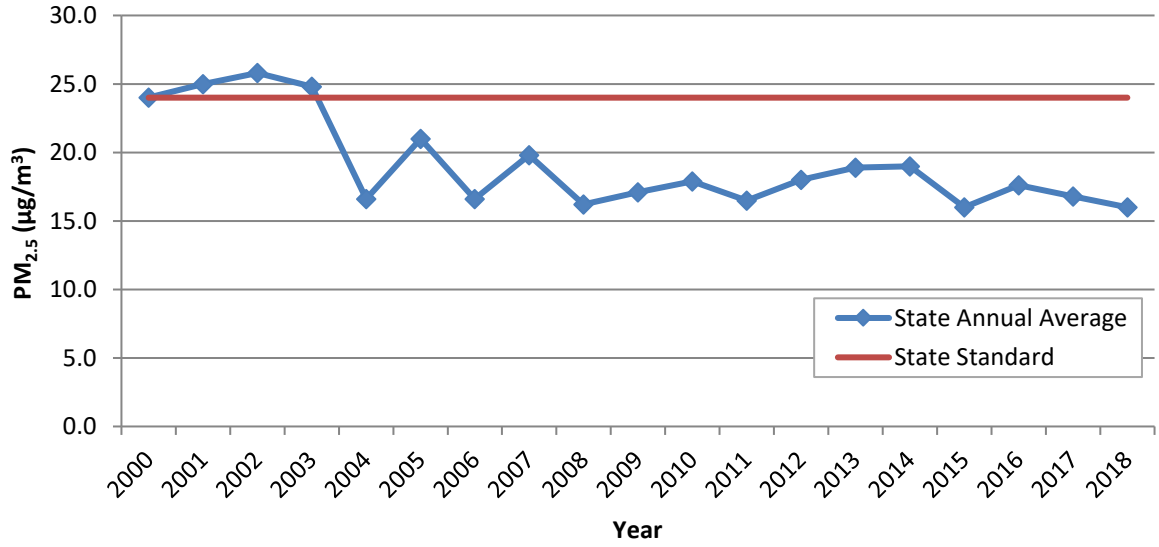
Graph 2-4 SCAB 24-Hour Average Concentration PM2.5 Trend (Based on Federal Standard)[1]



[1] The most recent year where 8-hour concentration data is available is 2012.

Source: CARB

Graph 2-5 SCAB Annual Average Concentration PM2.5 Trend (Based on State Standard)[1]



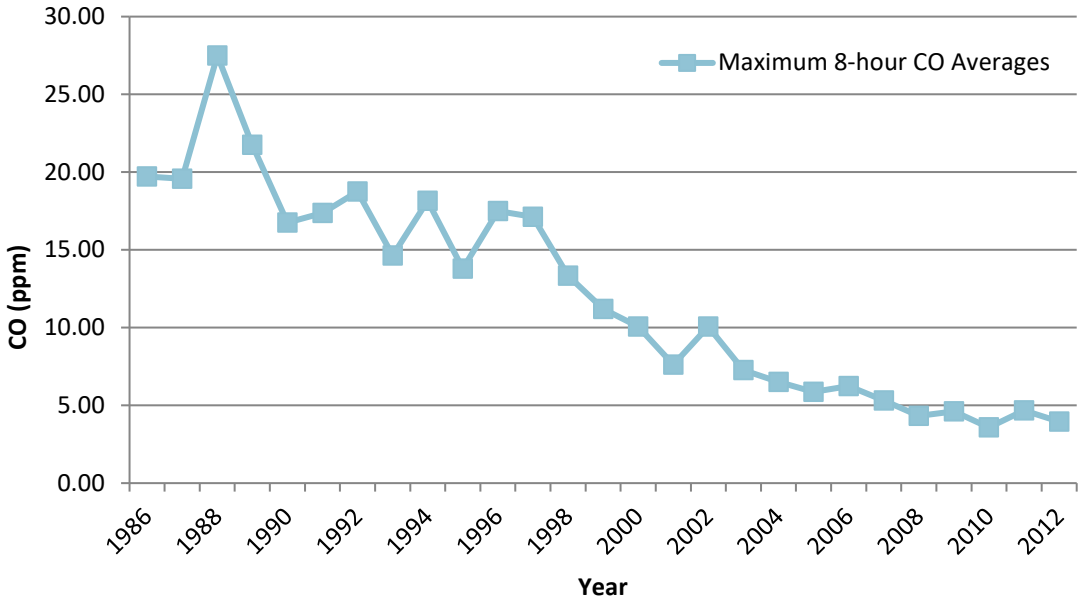
[1] The most recent year where 8-hour concentration data is available is 2012.

Source: CARB

In March 2017, the SCAQMD released the Final 2016 AQMP. The 2016 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as, explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2012 AQMP, the 2016 AQMP incorporates scientific and technological information and planning assumptions, including the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and updated emission inventory methodologies for various source categories.

The most recent CO concentrations in the SCAB are shown in Graph 2-6. CO concentrations in the SCAB have decreased markedly — a total decrease of more about 80 percent in the peak 8-hour concentration since 1986. It should be noted 2012 is the most recent year where 8-hour CO averages and related statistics are available in the SCAB. The number of exceedance days has also declined. The entire SCAB is now designated as attainment for both the state and national CO standards. Ongoing reductions from motor vehicle control programs should continue the downward trend in ambient CO concentrations.

Graph 2-6 SCAB 24-Hour Average Concentration CO Trend[1]

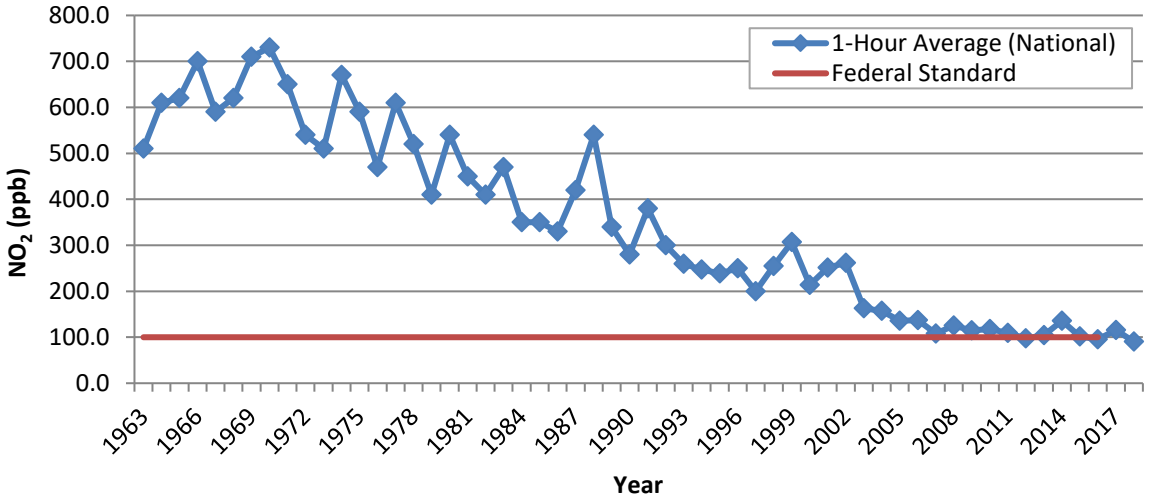


[1] The most recent year where 8-hour concentration data is available is 2012.

Source: CARB

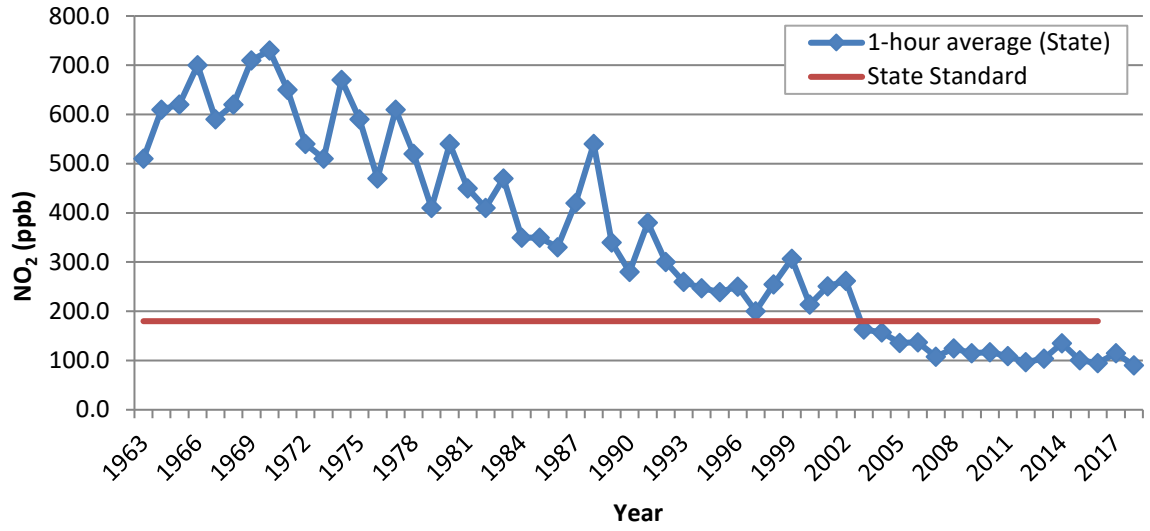
The most recent NO_2 data for the SCAB is shown in Graph 2-7 and Graph 2-8. Over the last 50 years, NO_2 values have decreased significantly; the peak 1-hour national and state averages for 2018 is approximately 82 percent lower than what it was during 1963.

Graph 2-7 SCAB 1-Hour Average Concentration NO2 Trend (Based on Federal Standard)



Source: CARB

Graph 2-8 SCAB 1-Hour Average Concentration NO2 Trend (Based on State Standard)



Source: CARB

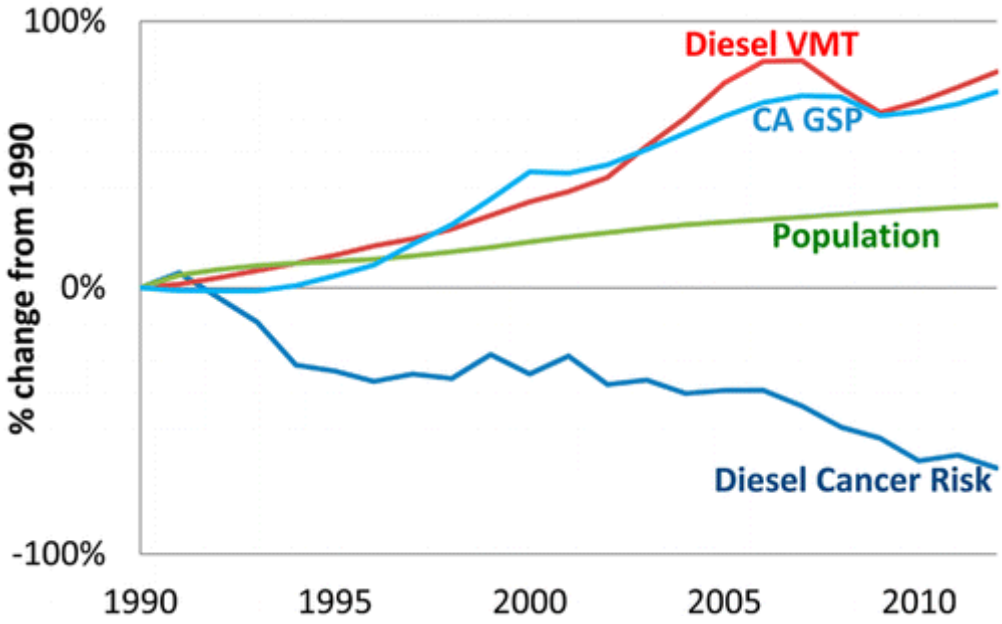
The American Lung Association website includes data collected from state air quality monitors that are used to compile an annual State of the Air Report. The latest State of the Air Report compiled for the SCAB was in 2018. As noted, air quality in the SCAB has significantly improved in terms of both pollution levels and high pollution days over the past three decades. The area's average number of high O_3 days dropped from 230 days in the initial 2000 State of the Air report (1996--1998) to 146 days in the 2018 report. The region has also seen dramatic reduction in particle pollution since the initial 2000 State of the Air report.

Based on information available from CARB, overall cancer risk throughout the SCAB has had a declining trend since 1990. In 1998, following an exhaustive 10-year scientific assessment process, CARB identified particulate matter from diesel-fueled engines as a toxic air contaminant. The SCAQMD initiated a comprehensive urban toxic air pollution study called the Multiple Air Toxics

Exposure Study (MATES). DPM accounts for more than 70 percent of the cancer risk. In 2008, the SCAQMD prepared an update to the MATES-II study, referred to as MATES-III. MATES-III estimates the average excess cancer risk level from exposure to TACs is an approximately 17 percent decrease in comparison to the MATES-II study. In 2015, the SCAQMD published an in-depth analysis of the toxic air contaminants and the resulting health risks for all of Southern California. The *Multiple Air Toxics Exposure Study in the SCAB, MATES IV,"* shows that cancer risk has decreased by 57 percent since MATES III (2005).

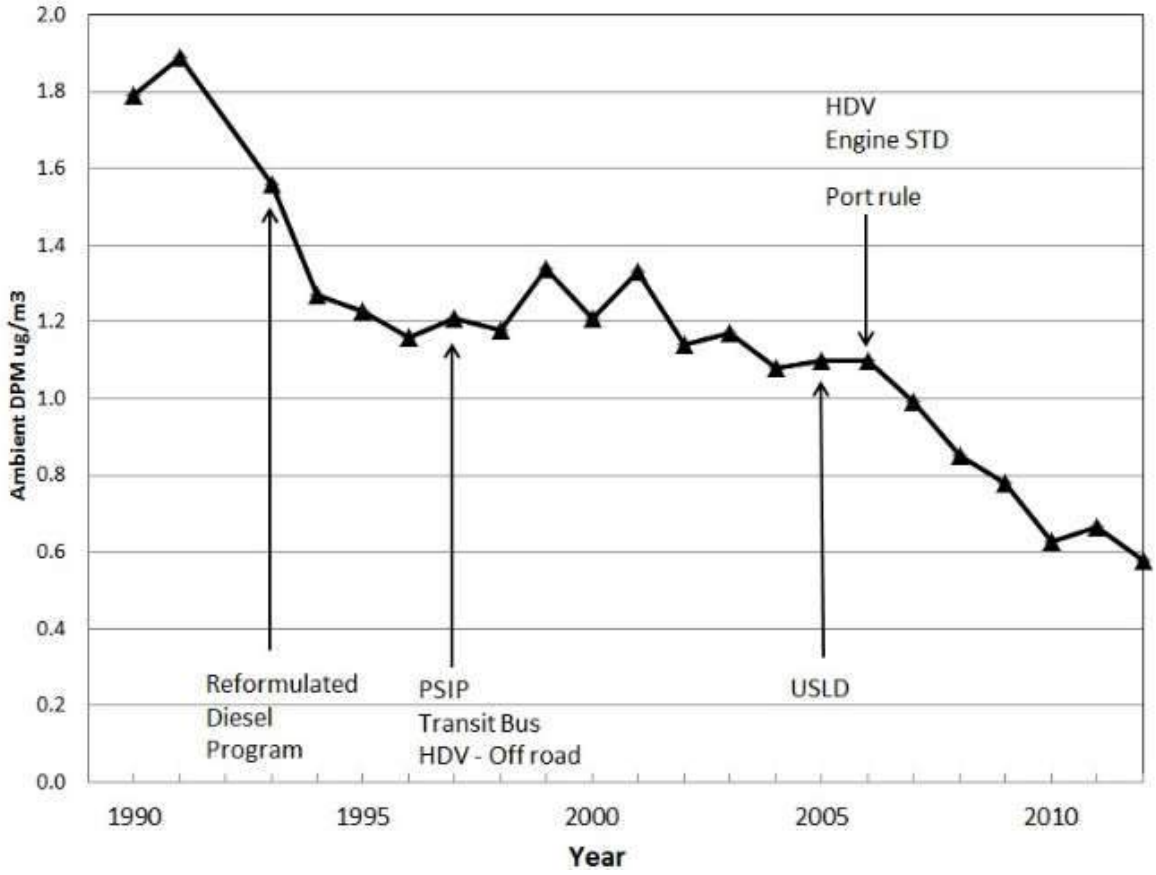
In 2000, CARB's Diesel Risk Reduction Plan (DRRP) recommended the replacement and retrofit of diesel-fueled engines and the use of ultra-low-sulfur (<15ppm) diesel fuel. As a result of these measures, DPM concentrations have declined 68% from 2000 to 2010, even though the state's population increased 31 percent and the amount of diesel vehicles miles traveled increased 81 percent, as shown below. With the implementation of statewide diesel-related control regulations, CARB expects a DPM decline of 85 percent by 2020; see Graph 2-9 and Graph 2-10.

Graph 2-9 Diesel Particulate Matter and Diesel Vehicle Miles Trend



Source: CARB: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health

Graph 2-10 Statewide DPM Abient Concentration



Source: CARB: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health

The CARB and the Ports of Los Angeles and Long Beach have adopted several iterations of regulations for diesel trucks that are aimed at reducing DPM. More specifically, the CARB Drayage Truck Regulation, the CARB statewide On-road Truck and Bus Regulation, and the Ports of Los Angeles and Long Beach Clean Truck Program (CTP) require accelerated implementation of *clean trucks* into the statewide truck fleet. In other words, older more polluting trucks will be replaced with newer, cleaner trucks as a function of these regulatory requirements.

Response E-2

The comment states that the analysis in the Draft EIR should clarify whether the project would include cold storage on-site, and if so, revise the air quality impact analysis to include emissions from transport refrigeration units (TRU) that would be used during project operation. The comment includes recommendations in the event the project would not include cold storage.

The project does not propose and is not designed for cold storage uses and therefore, as the comment correctly points out the use of TRUs was not included in the air quality modeling. The City would condition the project the to require additional CEQA analysis in the event such is use is subsequently proposed.

Response E-3

The comment summarizes the air quality impact conclusions and mitigation measures included in the Draft EIR to reduce emissions of nitrogen oxides (NOx). The comment states that as required under CEQA, the project's mitigated air pollutant emissions should be quantified and reported in the Final EIR, and requests inclusion of the air pollutant emission reduction measures found in Attachment A of Letter E.

As noted in the Draft EIR, a large percentage of the pollutant emissions associated with the project, including NO_x emissions, are attributed to the tailpipe emissions of vehicles traveling to and from the project site. Also, the federal government and the State of California are the only entities capable of regulating tailpipe emissions. The Draft EIR includes project-specific mitigation measures that address – and reduce – air pollutant emissions resulting from activities that occur on-site and for which the City is able to provide oversight.

Mitigation that addresses activities beyond the City's purview is not feasible. Feasible means capable of being accomplished in a successful manner within a reasonable period of time, considering economic, environmental, legal, social, and technological factors (see 14 CCR Section 15364). Because it is not feasible for the City to substantially reduce the air pollutant emissions from heavy-duty trucks during project operation, the Draft EIR properly concluded that the impact would be significant and unavoidable.

Table 2-1 responds to CARB's recommendations to implement air pollutant emission reduction measures found in Attachment A.

Table 2-1 Evaluation of CARB Recommended Measures

Recommended Measures	Discussion
Construction Measures	
Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.	The commenter suggests using cleanest practices and equipment during construction. The City has added the following MM AQ-5 as follows: **MM AQ-5**. During construction activity, electrical hook ups to the power grid for electric construction tools, such as saws, drills and compressors, and using electric tools shall be provided where feasible.
Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.	At present, requiring zero-emission vehicles and infrastructure supporting the same is economically and technologically infeasible; also, such vehicles are not available on a large enough scale to be relied upon. In a report titled "Transitioning to Zero-Emission Heavy Duty Freight Vehicles," the International Council on Clean Transportation (ICCT) provides an overview of advancing technologies (ICCT 2017).[1] 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" (ICCT page 31). "Tesla's announced battery electric semi-tractor prototype is the only battery electric project we found in our [world-wide] assessment targeting long-haul heavy-duty

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

Recommended Measures	Discussion
	applications" (ICCT, p. 31). Imposing extensive requirements on the proposed project related to emerging technology, when the various types of technological advancements and their timeframes for common availability are not known with any certainty, does not constitute feasible mitigation under CEQA.
In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits such that emission reductions achieved equal or exceed that of a Tier 4 engine.	The commenter suggests using Tier 4 construction equipment. The City has added MM AQ-6 as follows: **MM AQ-6.** For construction equipment greater than 50 horsepower (>50 HP), the Construction Contractor will make efforts to use off-road diesel construction equipment that complies with EPA/CARB Tier 4 emissions standards during all construction phases, if available. All construction equipment will be tuned and maintained in accordance with the manufacturer's specifications.
In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.	The commenter does not provide substantial evidence for how this measure would reduce impacts. Notwithstanding, MM AQ-5, as previously identified has been added to the Final EIR.
In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-NO_x standard starting in the year 2022.	The commenter does not provide substantial evidence for how this measure would reduce impacts. Notwithstanding, the project would comply with State law.
In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB staff is available to assist in implementing this recommendation.	The commenter does not provide substantial evidence for how this measure would reduce impacts. Notwithstanding, the project will be required by law to comply with applicable air quality regulations.
Operation Measures	
Include contractual language in tenant lease agreements that requires tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.	The Draft EIR includes a mitigation measure which addresses this comment. MM-AQ-4 states: **AQ-4 Electric Interior Vehicles.** All buildings shall be designed to provide infrastructure to support use of electric-powered forklifts and/or other interior vehicles. On-site outdoor cargo handling equipment (CHE) (including yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site equipment) would be powered by non-diesel fueled engines. See Draft EIR, Section 4.4, *Air Quality*.

Recommended Measures	Discussion
Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units. This requirement will substantially decrease the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included in lease agreements.	The project does not include nor is designed for cold storage uses. In the event such use is proposed, the City would analyze any such use for compliance with CEQA and would require additional environmental analysis, if applicable.
Include contractual language in tenant lease agreements that requires all TRUs entering the project site be plug-in capable.	The project does not include nor is designed for cold storage uses. In the event such use is proposed, the City would analyze any such use for compliance with CEQA and would require additional environmental analysis, if applicable.
Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.	The commenter does not provide justification for how this measure would substantively reduce impacts. Notwithstanding, tenants for proposed uses like the project generally utilize the most fuel efficient fleets for their business activities. These fleets typically include zero-emissions or alternatively fueled light and medium-duty vehicles.
Include contractual language in tenant lease agreements requiring all TRUs, trucks, and cars entering the project site be zero-emission.	The project design does not anticipate cold storage uses. A condition of approval has been added that states cold storage warehouse uses will not be allowed until such time as that use is proposed and additional CEQA analysis is performed and approved by the City.
Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available.	The Draft EIR already includes a mitigation measure which addresses this comment. MM-AQ-4 states: **AQ-4 Electric Interior Vehicles.** All buildings shall be designed to provide infrastructure to support use of electric-powered forklifts and/or other interior vehicles. On-site outdoor cargo handling equipment (CHE) (including yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site equipment) would be powered by non-diesel fueled engines. See Draft EIR, Section 4.4, *Air Quality*.
Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be model year 2014 or later, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2030.	The commenter does not provide substantial evidence for how this measure would reduce impacts. Notwithstanding, the project would comply with State law.
Include contractual language in tenant lease agreements that requires the tenant be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, 3 Periodic Smoke Inspection Program (PSIP),4 and the Statewide Truck and Bus Regulation.	Pursuant to a phase-in schedule established by the U.S. Environmental Protection Agency (EPA) and the CARB, all heavy- and heavier-duty diesel-fueled trucks must have a 2010 Model Year engine or newer by 2023.

Recommended Measures	Discussion
Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than five minutes while on site.	The Draft EIR includes a mitigation measure which addresses this comment. MM-AQ-1 states: …Diesel delivery trucks servicing the project shall not idle for more than five (5) minutes…
Include contractual language in tenant lease agreements that limits on-site TRU diesel engine runtime to no longer than 15 minutes. If no cold storage operations are planned, include contractual language and permit conditions that prohibit cold storage operations unless a health risk assessment is conducted, and the health impacts fully mitigated.	The project does not anticipate cold storage uses. A condition of approval has been added to the project that will not allow cold storage warehouse uses until such time as that use is proposed and additional CEQA analysis is performed and approved by the City.
Include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.	The commenter requests that the project maximize the installation of solar panels to reduce area source emissions. As addressed in the Draft EIR, project buildings would be designed to support solar PV panel systems. Installation of the PV system would be determined by the individual building tenant. Notably, the ability to install solar is limited by requirements of the Riverside County Airport Land Use Commission given the proximity of the site to the Chino Municipal Airport.

Response E-4

The comment provides closing comments summarizing the points raised in the comment letter. Refer to Comments E-1 through E-3 for responses to these comments. No further response is required.

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SAN BERNARDINO COUNTY

Department of Public Works
- Flood Control
- Operations
- Solid Waste Management
- Surveyor
- Transportation

Brendon Biggs, M.S., P.E.
Interim Director

Transmitted Via Email

March 10, 2020

City of Eastvale
Gina Gibson-Williams, Director
Planning Department
12363 Limonite Avenue, Suite 910
Eastvale, CA 91752

File: 10(ENV)-4.01

RE: CEQA – NOTICE OF AVAILABLITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE HOMESTEAD INDUSTRIAL PROJECT

Dear Ms. Gibson-Williams:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on January 28, 2020** and pursuant to our review, the following comments are provided:

Permits/Operations Support Division (Melissa Walker, Chief, 909-387-7995):
The Project is adjacent to San Bernardino County Flood Control District (SBCFCD) right-of-way and facilities (1-301-11 Cucamonga Channel, C/E and County Line Channel 1-317-IA). Any encroachments on the District's right-of-way or facilities including, but not limited to, access, fencing and grading, landscaping, utility crossings, staging areas, and lane reconfiguration affecting District access to its facilities will require a permit from the SBCFCD prior to start of construction. Also, SBCFCD facilities built by the Army Corps· of Engineers (ACOE) will require the SBCFCD to obtain approval (408-Permit) from the ACOE. The necessity for any, or all of these permits, and any impacts associated with them, should be addressed in the DEIR prior to adoption and certification. F-1

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please contact the individuals who provided the specific comment, as listed above. F-2

Sincerely,

MICHAEL R. PERRY
Supervising Planner
Environmental Management

MRP:AJ:sr
Email: ggibson-williams@eastvaleca.gov

Letter F

COMMENTER: Michael Perry, Supervising Planner, Environmental Management Division of the San Bernardino County Department of Public Works

Response F-1

The comment states that an encroachment permit is required for construction related activities occurring with the San Bernardino County Flood Control District (SBCFCD) right of way or facilities, and SBCFCD facilities built by the Army Corps of Engineers will require a 408 Permit.

This comment is acknowledged. The comment does not pertain to the adequacy of the EIR or the CEQA process. Therefore, no further response is required.

Response F-2

The comment requests that the San Bernardino County Department of Public Works is included in the circulation list for project notices, reviews, and hearings.

The Department of Public Works has been added to the project distribution list, as requested.

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Via Email and U.S. Mail

March 5, 2020

Gina Gibson-Williams, Director
Community Development Department
City of Eastvale
12363 Limonite Avenue, Suite 910
Eastvale, CA 91752
ggibson-williams@eastvaleca.gov

Marc A. Donohue, City Clerk
City Clerk's Office
City of Eastvale
12363 Limonite Avenue, Suite 910
Eastvale, CA 91752
mdonohue@eastvaleca.gov

Re: Comment on Draft Environmental Impact Report, The Homestead Industrial Project (SCH2019090335)

Dear Ms. Gibson-Williams and Mr. Donohue:

I am writing on behalf of the Supporters Alliance For Environmental Responsibility ("SAFER") regarding the Draft Environmental Impact Report ("DEIR") prepared for the project known as The Homestead Industrial Project, including all actions related or referring to the proposed demolition of existing structures and development of six industrial use buildings totaling up to 1,080,060 square feet located on a 56 acre site west of Archibald Avenue at the terminus of Limonite Avenue in the City of Eastvale ("Project"). G-1

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. SAFER request that the Community Development Department address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997). G-2

Sincerely,

Richard Drury

Letter G

COMMENTER: Richard Drury, Supporters Alliance for Environmental Responsibility (SAFER)

Response G-1

The comment provides introductory information regarding who they represent, as well as a summary of project elements.

This comment does not pertain to the adequacy of the EIR or the CEQA process. Therefore, no further response is required.

Response G-2

The comment states that the Draft EIR is not adequate as an informational document and fails to impose all feasible mitigation measures to reduce impacts. The comment requests that the Draft EIR is revised and recirculated.

The comment provides no explanation or support for this assertion. *CEQA Guidelines* Section 15204 provides guidance for the review of CEQA documents, and Section 15204(c) states:

> Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

As the comment does not meet these criteria, further response is not feasible, or warranted.

BLUM COLLINS, LLP
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AON CENTER
707 WILSHIRE BOULEVARD, SUITE 4880
LOS ANGELES, CALIFORNIA 90017
(213) 572-0400

March 9, 2020

Gina Gibson-Williams
Community Development Director
City of Eastvale
12363 Limonite Avenue, Suite 910
Eastvale, California 91752

VIA EMAIL TO:
ggibson-williams@eastvaleca.gov

Re: *Homestead Industrial EIR (SCH NO. 2019090335)*

Dear Ms. Gibson-Williams:

We write to submit Golden State Environmental Justice Alliance's ("GSEJA's") objections to the draft environmental impact report ("DEIR") for the Homestead Industrial Project ("Project"). GSEJA also requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this Project. Send all communications to Golden State Environmental Justice Alliance, P.O. Box 79222, Corona, California 92877. H-1

1.0 Summary

As we understand it, the Project proposes the development of six industrial use buildings totaling up to 1,080,060 square feet on the site of an existing dairy. The existing structures would be demolished to accommodate the new development, including the extension of Limonite Avenue through the project site. The buildings would range in size from 37,125 square feet to 507,631 square feet. Each building would feature office space, dock doors, and be located on individual parcels. 123 total dock doors are proposed across all the buildings. Each building would also feature an at-grade door for vehicle access. The buildings would be from 30 feet to 40 feet in height. Specific tenants are unknown, however, uses would be consistent with the Industrial Park (I-P) zone. H-2

The proposed Project would provide 794 parking stalls, apportioned to each building and parcel. The 794 spaces are composed of a combination of standard, accessible, and accessible van spaces. Additionally, Buildings 5 and 6 would have 90 trailer stalls.

Grading would require a maximum of 94,000 cubic yards (cy) cut, and approximately 61,000 cy of fill. Grading will be balanced on-site to the extent feasible and any excess material would be provided to a site requiring clean fill or taken to a permitted landfill that will accept it.

H-2

2.0 Project Description

The Project Description and Site Plan (Appendix 2) are internally inconsistent. The Project Description states there are 6 proposed buildings while the Site Plan depicts 7 buildings. Within the EIR, Figure 2-7 Landscape Plan also depicts 7 buildings. Also, each section of environmental analysis utilizes a different total building square footage for the proposed Project. The EIR must be revised to be internally consistent in order to be a reliable informational document.

Discretionary actions related to the development of the proposed Project include:

1. Rezoning from Heavy Agricultural (A-2) to Industrial Park (I-P)
2. Major Development Plan Reviews
3. Tentative Parcel Map for the subdivision of the site
4. Lot line adjustment to subdivide a parcel
5. Variance from City landscape shade and lighting requirements

H-3

The EIR does not explain why a Tentative Parcel Map (TPM) and a Lot Line Adjustment (LLA) are both proposed for one project. It must be noted that a LLA cannot subdivide a parcel but only adjust the location of a recorded property line or underlying property line on an existing parcel. The existing site is two parcels of land. The TPM in Appendix 2 depicts seven new parcels. If five new parcels are created, a Tentative Tract Map (TTM) is required pursuant to the Subdivision Map Act. This analysis and information must be included in a revised and recirculated EIR.

4.2 Air Quality

The EIR identifies a significant adverse regional air quality impact with respect to NOx emissions exceeding the SCAQMD's significance threshold. The analysis then indicates that the NOx impacts cannot be mitigated to a less than significant level. However, the EIR does not include adequate analysis to support this conclusion. It doesn't identify any potential measures, estimate potential emission reductions, evaluate costs, or evaluate the feasibility of each potential measure. Without such an analysis, there is no basis for concluding that NOx emissions cannot feasibly be mitigated. H-4

The Air Quality Analysis (AQA) assumes 520,317 sf of the project area will be used as Unrefrigerated Warehouse - Rail and 560,291 sf will be used as Unrefrigerated Warehouse - No Rail. The EIR states that the 6 proposed Industrial buildings will be utilized as "Light Industrial" and does not specify that any or all of the buildings will not include refrigeration. The 6 Industrial buildings have an existing Zoning designation of Heavy Agricultural (A-2) which is proposed to be changed to Industrial Park (I-P) as part of the Project. The I-P Zoning designation permits a variety of Industrial, Manufacturing, Retail, Business Operations and Services, and Public Use Classifications[1], and does not exclude refrigerated warehouses. At least 50% of the proposed warehouse space must be modeled as refrigerated/cold storage. This is especially necessary because cold storage is permitted by right in the Industrial Park District. H-5

The Project Description states that the Project will include 94,000 cubic yards (cy) of cut, and approximately 61,000 cy of fill. Although this is a difference of 33,000 cy of material, "grading will be balanced on-site to the extent feasible and any excess material would be provided to a site requiring clean fill or taken to a permitted landfill that will accept it." The CalEEMod Output Sheets model 4,125 hauling trips during the grading phase, indicating that the 33,000 cy of excess material will be hauled by trucks with an 8 cy capacity. The haul trip length in CalEEMod is the default 20 miles although a site requiring clean fill or a permitted landfill that will accept the material has not been identified within 20 miles of the site in the EIR. The AQA must be revised to include this information as part of a recirculated EIR. H-6

The CalEEMod output sheets also assume vendor trip length of 6.90 miles for all phases of construction. The EIR does not provide information regarding where the construction H-7

[1]Eastvale Municipal Code Section 120.03.030. - Commercial and industrial permitted uses and development standards https://library.municode.com/ca/eastvale/codes/code_of_ordinances?nodeId=PTBLADECO_TIT120PLZO_CH120.03ZODIRE_S120.03.030COINPEUSDEST

materials are sourced from or if they are all coming from the same location during all phases. The EIR must be revised to include an AQA which presents an accurate analysis of all potentially significant impacts in order to be an adequate informational document as part of a recirculated EIR. H-7

Further, the CalEEMod output sheets model fewer average daily trips (ADT) for both passenger cars and trucks during project operations. The CalEEMod sheets model 1,689 ADT for passenger cars and 393 ADT for trucks. The Traffic Impact Assessment (TIA) concludes the Project will generate 1,694 ADT for passenger cars and 408 ADT for trucks. The EIR must be revised to be internally consistent in order to be a reliable informational document. H-8

Section 8.52.020 of the Eastvale Municipal Code prohibits construction activity within 0.25 miles of an inhabited dwelling between the hours of 6:00 P.M. and 6:00 A.M. during the months of June through September and between the hours of 6:00 P.M. and 7:00 A.M. during the months of October through May. Thus, the legal hours of construction at the Project site are 6:00 A.M. - 6:00 P.M., June through September and 7:00 A.M. - 6:00 P.M. October through May. There are no specifications limiting construction on weekends or federal holidays. The EIR does not provide a "worst-case scenario" analysis of construction equipment emitting pollutants for the legal 12 hours per day, 7 days per week during the summer months and 11 hours per day, 7 days per week during the winter months. It is legal for construction to occur for much longer hours and two additional days (7 days per week permitted while 5 days per week analyzed) than modeled in the Air Quality Analysis. The Air Quality modeling must be revised to account for these legally possible longer construction days and increased number of construction days. H-9

It must also be noted that the Air Quality Analysis does not state if roadway improvements constructed as part of the project were included in the AQA. The Project proposes the following roadway improvements in order to implement the project:

Limonite Avenue

Limonite Avenue would be developed with a right-of-way of approximately 60 feet with a 16-foot northerly and 20-foot southerly landscape/trail easement to meet the classification of a modified Urban Arterial and feature four travel lanes with a raised center median, with easements for the landscaped parkway and multi-use trails. Other H-10

features still to be determined include the number and placement of driveways, turning lanes/intersection types, acceleration/deceleration lanes, bike lanes and trails.

Archibald Avenue

Archibald Avenue would be widened along the project frontage to 152 feet to meet the classification of an Urban Arterial.

Limonite Avenue and Archibald Avenue Intersection

Archibald Avenue would be widened to 165 feet at the intersection with Limonite Avenue and conform with County of Riverside Standard No. 91. Traffic signal improvements would also be constructed. The widening of Archibald Avenue would require the relocation of Southern California Edison (SCE) transmission poles and overhead lines (SCE and telecommunication) along Archibald Avenue.

H-10

Additionally, the EIR concludes that the Project will not exceed growth forecasts because it will create approximately 698 jobs according to SCAG's 2001 Employment Density Study. This is contrary to *Section 6.1 - Growth Inducement* which states that Eastvale has also already exceeded its 2040 SCAG population growth forecast. Any growth from the proposed Project will further compound this issue. A revised EIR must include this information for Air Quality Analysis and a finding of significance must be made.

With regard to growth forecasts and Air Quality modeling, the EIR utilizes the Light Manufacturing employment ratio of 1 employee generated per 1,548 sf of building area to conclude that 698 employees will be generated by the 1,080,060 sf project. However, SCAG's 2001 Study included a density ratio for Warehouses: 1 employee generated per 581 sf of building area. Throughout the EIR, the Project is referred to as a high-cube warehouse, warehouse, and other types of fulfillment center uses. The CalEEMod Output Sheets also analyze the Project as a warehouse. Utilizing SCAG's employee density ratio for warehouses results in a total of 1,859 employees generated by the Project, which is accurate for the proposed use and consistent with the AQA. The Project therefore represents 34% of the City's 5,500 new jobs analyzed by SCAG's 2016 RTP/SCS created between 2012 and 2040. The EIR does not present any analysis or discussion of the jobs created in the City since 2012 or jobs "in the pipeline" from other pending projects. The EIR must be revised to include this discussion and an accurate estimate of the number of employees generated by the proposed Project.

H-11

It must also be noted that *Section 6.1 - Growth Inducement* of the EIR utilizes the Riverside County General Plan employment density factors for Light Industrial land uses to conclude the Project will generate 1,049 jobs. This is inconsistent with the methodology utilized in the AQA. The EIR must be revised to be internally consistent and utilize the same methodology when analyzing the same factor. Additionally, the employee density discussion in the EIR under Impact AQ-1 states there are 7 proposed buildings when there are 6 proposed buildings in the Project Description. A revised EIR must be recirculated to correct the errors within the EIR and ensure adequate and accurate environmental analysis is completed. H-12

4.6 Hazards and Hazardous Materials

The Project site is located within Compatibility Zone C of the Chino Airport Influence Area. Zone C allows an intensity average of 75 people per acre for non-residential land uses, and no vegetation over four feet in height within certain areas of the Project site. The EIR concludes that the Project will not result in a safety hazard for people residing or working in the Project area due to airport/airstrip operations because review of the Project by the Riverside County ALUC for land use compatibility is required. The EIR presents the threshold required for analysis within Zone C, and does not include any meaningful analysis or supporting evidence to demonstrate that it will or will not comply with these requirements. The EIR's conclusion that the Project will have less than significant impacts because it will be reviewed by another agency represents deferred mitigation. This analysis must be provided in a revised and recirculated EIR. H-13

4.9 Noise

The EIR does not include all sensitive receptor locations in the project vicinity. The EIR must analyze the potentially significant noise impacts to James Huber Park, which is approximately 640 feet from the Project site. This is vital as the park is a sensitive receptor and closer to the Project site than three of the four receptors chosen for analysis. H-14

Additionally, the reference construction noise measurements taken at various Project sites do not give any identifying information to discern whether they accurately represent construction noise generated by the proposed Project. All concrete mixer related construction reference noise level measurements were collected from a *nighttime* concrete pour at an industrial construction site, between 1:00 a.m. to 2:00 a.m. The proposed Project does not include any overnight construction. Framing and grading activities were H-15

measured at residential construction sites. The type of equipment and materials utilized for residential construction can vary greatly from the types necessary for industrial construction. For example, residential construction is typically wood framing and industrial construction is typically steel framing. The EIR must be revised to include reference noise levels that are representative of the construction schedule for the proposed Project. H-15

Tables 10-2 through 10-6 depict the noise levels at each sensitive receptor during each phase of construction. The calculations include noise reduction credits for a stationary source drop off rate of 6.0 dBA per doubling of distance and estimated barrier attenuation from existing barriers in the Project study area. However, the EIR does not include methodology describing how it concluded that 6.0 dBA noise reduction per doubling of distance will occur, or the type of sound barriers in the study area. This information and analysis must be included in a revised and recirculated EIR. H-16

4.11 Transportation/Traffic

It must be noted that the EIR is again internally inconsistent regarding basic elements of the Project. The EIR and Traffic Impact Assessment (TIA) analyzes 7 proposed buildings when there are 6 proposed buildings in the Project Description. H-17

The EIR and TIA must be revised to include analysis of the following facilities providing direct access to the Project site: H-18

Freeway Merge/Diverge
CA-60 at I-15
SR-91 at I-15
I-15 at I-10
I-15 at I-210
I-15 at I-215

Freeway On/Off Ramps
CA-60 at Archibald Ave.
CA-60 at Euclid Ave.
I-15 at Ontario Ranch Rd.

Intersections
Euclid Ave. at Edison Ave.

Euclid Ave. at Archibald Ave.

This is especially vital for analysis since the I-215 and I-15 provide direct access to the Project site from the Southern California Logistics Airport. H-18

5.5 Effects Found Not to be Significant - Population and Housing

The EIR concludes that impacts to population and housing will not be significant because "development of the project is not *likely* to add to population growth as the existing regional workforce is *anticipated* to adequately supply the needed employees." The EIR also states that "it is *expected* that the project would largely absorb workers from the regional labor force and would not *generally* attract new workers into the region." The EIR utilizes uncertain language and does not provide any meaningful analysis or supporting evidence to substantiate this conclusion. Providing unemployment rates for Riverside County does not prove that the unemployed population is qualified for or interested in work in the industrial sector. The EIR cites that manufacturing jobs in the City increased by 4.5 percent over a 10-year period, which makes it more likely that manufacturing/industrial sector workers will move to the City because many jobs in this industry are otherwise outsourced internationally. H-19

6.1 Growth Inducement

The EIR concludes that the proposed Project would "generate approximately 1,049 jobs based on employment density factors for Light Industrial land uses utilized in the County of Riverside General Plan." The EIR is internally inconsistent as this is not the same methodology to calculate employment density as utilized in the Air Quality Analysis. Regardless, the EIR states it is "*expected* that the project would *largely* absorb workers from the regional labor force and would not *generally* attract new workers to the region due to the current unemployment rate in Riverside County." Again, the EIR utilizes uncertain language and continues this tone by stating that "a *small proportion* of new workers attracted to the area as a result of project employment are likely to settle within Eastvale or one of the adjacent cities of Ontario, Chino, Corona, Jurupa Valley, or Norco." The EIR includes Table 6-1 to demonstrate the Project's potential impact on surrounding cities if they absorb 15% of the Project's employees. The impacts on surrounding communities are not discussed beyond the statement that the population growth is within their respective SCAG population growth forecasts. The EIR does not include any H-20

supporting evidence to demonstrate how surrounding cities' absorption of additional population is less than significant. For example, 15% of the Project's employees is equal to 13.4% of Corona's projected growth between 2019 and 2040. There is no analysis or discussion of new housing (direct population increases) or industrial/commercial projects (indirect population increases) created in Corona from projects currently under construction, in the entitlement phase, or "in the pipeline" from other pending projects to demonstrate that the proposed Project does not contribute to Corona exceeding their growth forecast. The same is true for Eastvale, as in 2019 the city has already exceeded its 2040 growth forecast, and any growth related to the proposed project is a significant impact.

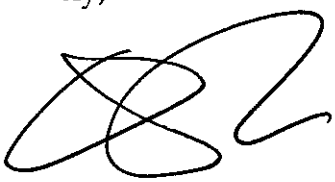
H-20

CONCLUSION

For the foregoing reasons, the EIR is flawed and an amended EIR must be prepared for the proposed project and recirculated for public review.

H-21

Sincerely,



Gary Ho
Blum | Collins, LLP

Letter H

COMMENTER: Gary Ho, Golden State Environmental Justice Alliance (GSEJA)

Response H-1

The comment provides introductory information regarding GSEJA's comment submittal and requests GSEJA is included in the circulation list for project notices, reviews, and hearings.

The commenter has been added to the project distribution list as requested. The comment does not pertain to the adequacy of the EIR or the CEQA process. Therefore, no further response is required.

Response H-2

The comment provides a summary of project elements.

The comment does not pertain to the adequacy of the EIR or the CEQA process. Therefore, no further response is required.

Response H-3

The comment states that the Project Description, the Site Plan (Appendix 2), and Figure 2-7 Landscape Plan of the Draft EIR are internally inconsistent regarding number of proposed buildings, and that individual environmental impact analyses do not utilize a consistent building square footage. Additionally, the comment notes that a Tentative Tract Map (TTM) is required pursuant to the Subdivision Map Act if the project proposes five new parcels, as indicated by the Tentative Parcel Map in Appendix 2 of the Draft EIR.

It is common for minor site changes to occur over the course of the planning and review process as input is received on the project. In this case, there has been a change from seven to six buildings with minor changes in site layout. However, the overall project footprint and square footage of the project has remained substantially the same so as to not affect the construction or operation impact analysis.

The following revision is made to the Draft EIR, page 4.2-14, Impact AQ-1, second full paragraph:

> The project would develop **six** ~~**seven**~~ industrial use buildings on an existing dairy farm. According to SCAG's …

The proposed subdivisions considered and process by the City, fully comply with the provisions of the Subdivision Map Act.

Response H-4

The comment states that the Draft EIR does not provide adequate analysis to support the conclusion that NO_x emissions cannot be mitigated to a less than significant level, and does not identify potential measures, estimate potential emission reductions, evaluate costs, or evaluate feasibility of each potential measure.

This comment states that the CEQA document does not include analysis on the feasibility of applicable mitigation measures. CEQA requires lead agencies to adopt feasible mitigation measures to minimize the significant impacts of a project. Where the analysis demonstrates that a physical adverse environmental effect may or would occur without undue speculation, feasible mitigation

measures have been recommended to reduce or avoid the significant effect. Mitigation measures must be fully enforceable, have an essential nexus to a legitimate governmental interest, and be "roughly proportional" to the impacts of the project. To that end, the Draft EIR identified four specific mitigation measures that the City will impose on the project to reduce air quality emissions.

The Draft EIR correctly states that no additional feasible mitigation measures could reduce NO_x emissions to less than significant levels due to the fact that the majority of NO_x emissions are from mobile source (vehicular activity) and no measures exist for the project to meaningfully control tailpipe emissions (see Draft EIR, page 4.2-14).

Response H-5

The comment states that the Air Quality Analysis should assume at least 50 percent of the proposed warehouse space as refrigerated/cold storage, since cold storage is a permitted use in the Industrial Park (I-P) zoning designation.

The project does not propose nor is designed for cold storage uses. In the event such use is proposed, the City would analyze such use for compliance with CEQA and would require additional environmental analysis, if applicable.

Response H-6

The comment states that the haul trip length assumed in the Air Quality Analysis to transfer fill exported during construction activities should be revised from the default of 20 miles, since a permitted landfill site has not been identified within a 20-mile radius of the project site. A revised analysis must include this information as part of a recirculated Draft EIR.

The project analysis correctly models and considers up to 33,000 cubic yards of soil to be exported (see Air Quality Assessment in Appendix 4.2, page 45). The haul trip length of 20 miles utilized in the Air Quality Assessment is appropriate and based on California Emissions Estimator Model (CalEEMod) defaults. Furthermore, the El Sobrante Landfill is located less than 20 miles from the project site, so any export material would be taken to a site within the haul trip length in the model. As such, the air quality modeling is appropriate, supported by substantial evidence, and conservative in nature.

Response H-7

The comment states that the air quality analysis should include information on the location of source construction materials for an adequate analysis of impacts from vendor trips. Currently, the analysis assumes a default of 6.9 miles for all vendor trips. A revised analysis must include this information as part of a recirculated Draft EIR.

It would be unreasonable for the EIR to provide that information since material supply is unknown at this time. However, the Draft EIR relies on the CalEEMod to quantify emissions from vendor related trips during construction. CalEEMod default vendor trip distance is based on survey data from multiple air districts and is appropriate for urban environments where materials are generally locally available. As such, use of the CalEEMod defaults is appropriate and supported by substantial evidence. The commenter does not provide any substantive information as to why this trip distance is not correct.

Response H-8

The comment identifies inconsistent average daily trip volumes for passenger cars and trucks used in the air quality analysis and the Traffic Impact Assessment (TIA).

The Draft EIR and supporting technical report correctly modeled the number of trips anticipated to be generated by the project consistent with the TIA. Project trips are modeled based on the trip rates provided in the TIA which are then input into CalEEMod. The discrepancy the commenter notes between the number of trips identified in the TIA versus the CalEEMod outputs is a function of how trips are reported in each document (rounding discrepancies). CalEEMod calculates the number of trips by multiplying the trip rate per the unit size of land use by the land use size.[2] The TIA uses the same method for calculating trips but when reporting the information visually, incorporates the "ROUNDUP" function in Microsoft Excel (resulting in 320 trips for Building 1 Warehouse). As such, although there is a slight difference in trips, as reported in the TIA, the mobile-source emissions were modeled consistent with the trip rates themselves in the TIA. Notwithstanding, the difference between the total average daily trips (ADTs) reported in the CalEEMod outputs versus the TIA is statistically insignificant (the totals are within 99.97 percent).

Response H-9

The comment states that the Air Quality Analysis must include a *worst case scenario* analysis of construction equipment emissions to the maximum legal time per day, which includes longer hours and more days per week than modeled in the existing analysis.

The comment is correct that the City of Eastvale Municipal Code permits construction from 6:00 a.m. to 6:00 p.m. However, the comment is incorrect that the analysis must consider a 12-hour workday simply because the City allows construction to occur for 12 hours on a particular day. An 8-hour workday is a reasonable assumption of construction work based on a typical 40-hour work week; this represents approximately two-thirds (2/3) of the period during which construction activities are allowed pursuant to the Municipal Code and is a recognized typical workday by SCAQMD. SCAQMD's *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds* (SCAQMD 2006)[3] to LST thresholds is based on the maximum area a given piece of equipment can pass over in an 8-hour workday, as noted in the Air Quality Analysis (Draft EIR Appendix 4.2*,* page 47). As shown in Table 3-3 of the Air Quality Analysis, each piece of anticipated construction equipment is assumed to operate for 8 hours per day which, in reality, already would overestimate construction emissions. For example, during grading operations, water trucks would not operate continuously for an 8-hour period but would instead be deployed as necessary—usually three to four times per day—to minimize fugitive dust. Most equipment would likely operate for fewer hours per day than indicated in the Draft EIR. Therefore, the air quality analysis is proper, conservative, and supported by reasonable assumptions; it is unnecessary to analyze a 12-hour workday in the Draft EIR.

Response H-10

The comment states that the Air Quality Analysis fails to include the roadway improvements that are included in the project description.

[2] For instance, Building 1 Warehouse is 182,156 square feet, the trip rate for Warehouse use is 1.740 which results in 317 daily trips.
[3] http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf

The Draft EIR and supporting Air Quality Analysis (see Draft EIR, Appendix 4.2, page 46) evaluate the potential of off-site utility and infrastructure improvements that may be needed, which includes the roadway improvements described in the project description.

As noted in the Air Quality Analysis, construction emissions associated with off-site utility and infrastructure improvements may occur, however at this time, a specific schedule of off-site utility and infrastructure improvements is unknown. However, impacts associated with these expected activities are not expected to exceed the emissions identified for project-related construction activities. As such, no impacts beyond what has already been identified in this report are expected to occur.

Response H-11

The comment notes that the conclusions regarding growth in the City is inconsistent between the air quality and growth inducement discussions, and suggests the use of a warehouse category in estimating potential employment.

A discussion of growth is included under Impact AQ-1 of Draft EIR Section 4.2, *Air Quality,* as it is relevant to discussion of conformance with the Air Quality Management Plan. The Draft EIR uses an employee generation rate for the category of light manufacturing. This is consistent with both the land use designation and the proposed zoning, and reasonable based on the mix of building sizes, which can support a variety of light manufacturing uses, and not strictly warehouse employment. As indicated in Section 3.2, *Air Quality*, Section 5.5 *Population and Housing*, and Section 6.1, *Growth Inducement*, the project would likely pull from the existing labor force both in the City and within the region. Revisions to the Draft EIR are provided below to clarify this issue by adding additional context, and consideration of a greater employment rate.

The following revisions are made to Draft EIR, p. 4.2-14, Impact AQ-1:

> A project would be inconsistent with the AQMP if it would generate a considerable increase in regional air quality violations and affect the region's attainment of air quality standards, or if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP. The 2016 AQMP incorporates local city general plans and the SCAG's 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) socioeconomic forecast projections of regional population, housing, and employment growth, including those for Eastvale.
>
> The project would develop six ~~seven~~ industrial use buildings on an existing dairy farm. The project does not involve the development of housing, and thus, would not directly increase population through the increase in housing stock.
>
> According to SCAG's 2016 RTP/SCS, the employment opportunities in Eastvale are expected to be 9,800 in 2040, an increase of 5,500 from 2012 (SCAG 2016). **In Riverside and San Bernardino County employment opportunities are expected to increase by 583,000 and 375,000 respectively. Employment needs are generally met on a regional basis, as most employees in Riverside and San Bernardino County commute more than 30 minutes per day. Thus, it's useful to consider employment on a regional basis.**
>
> Using SCAG's estimated employee density for **the** associated land use **of *light manufacturing*** in Riverside **County**, the proposed project would create approximately 698 jobs, **while a *warehouse* land use would provide approximately 1,859 jobs,** as shown in Table 4.2-6 (SCAG 2001). **Given the differing sizes of the buildings, the project is likely to support both**

warehouse and other light industrial uses related to both of these classifications. Thus, employment resulting from the project would be expected to range from 698 to 1,859 jobs. ~~**This represents about 12.7 percent of the projected employment growth in the City. In addition, the project would replace existing jobs at the dairy farm and the new employment opportunities at the industrial facilities would likely pull from the existing labor force in the City and region. Therefore, the project would not generate population and employment growth which would exceed forecasts**~~.

Table 4.2-6 Commercial Employee Generation Rates

Land Use	Employees per Square Foot	Proposed Square Footage	Total Employees
Light Manufacturing	1/1,548 sf	1,080,060	698
Warehouse	**1/581**	**1,080,060**	**1,859**

Source: Table 10A (SCAG 2001).

Table 4.2-7 provides employment projections for the City of Eastvale, and Riverside and San Bernardino Counties. The table also identifies the percent of the projected increase in employment that would be created by the proposed project. Project employment represents approximately 12.7 to 33.8 percent of the projected employment growth in the City; however, the project is likely to pull from the regional labor force beyond the City of Eastvale.

Project employment would represent less than one percent of the projected increase in employment for Riverside or San Bernardino Counties. Therefore, the project would not generate population and employment growth which would exceed SCAG forecasts.

Table 4.2-7 Commercial Employee Generation Rates

	Employment		Increase		
Jurisdiction	2010 (2012)[1]	2040 Projected	Jobs	Percent	% from Project
Eastvale	4,300	9,800	5,500	127.8	12.7 to 33.8
Riverside County	592,000	1,175,000	583,000	98.5	0.1 to 0.3
San Bernardino County	653,000	1,028,000	375,000	57.4	0.2 to 0.5

Source: SCAG 2016

1. The source document uses 2012 for cities and 2010 for counties.

The above revisions further clarify and provide more context for the analysis, and do not change the results of the analysis, even with consideration of a consideration of a greater employment rate.

Response H-12

The comment notes two inconsistencies in the Draft EIR. Section 6.1, *Growth Inducement*, of the Draft EIR utilizes Riverside County General Plan employment density factors for Light Industrial land uses, which is inconsistent with the methodology applied in the Air Quality Analysis. Additionally, Impact AQ-1 is inconsistent with the number of proposed buildings in the project description.

Revisions to the Draft EIR are provided below to clarify this issue by adding additional context, and consideration of a greater employment rate.

The following revisions are made to Draft EIR, page 6-1, Section 6.1.1, *Population Growth*:

As discussed in Section 5, *Effects Found Not to be Significant*, the proposed project would not directly generate population growth because it does not include residential uses. However, the proposed industrial development would generate long-term operational employment. As discussed in Section 4.10, *Public Services*, and the following subsection, *Economic Growth*, the proposed project would generate approximately 1,049 jobs based on employment density factors for Light Industrial land uses utilized in the County of Riverside General Plan (Riverside County 2017). **In Draft EIR Section 4.2, *Air Quality*, SCAG employment factors and projects were also evaluated and identified a potential employment range of between 698 and 1,859 jobs, depending on the type of industrial or warehouse use.**

As discussed in **Draft EIR** Section 5, *Effects Found Not to be Significant*, and **Section 4.2, *Air Quality*, Impact AQ-1,** it is expected that the project would largely absorb workers from the regional labor force and would not generally attract new workers to the region due to the current unemployment rate in Riverside County. A small proportion of new workers attracted to the area as a result of project employment are likely to settle within Eastvale or one of the adjacent cities of Ontario, Chino, Corona, Jurupa Valley, or Norco. Table 6-2 summarizes potential population growth in Eastvale and surrounding communities based on the project's employment generation, each city's average household size, and **an a conservative** assumption that up to 15 percent of project-generated employees (**279 157** employees) and their families would move into any single community.

Table 6-2 Potential Project-Generated Growth in Eastvale and Surrounding Cities

City	2019 Population	2040 Population Forecast	Potential Project-Generated Population Growth[1]	Project Percentage of Anticipated Population Growth (%)[2]
Eastvale	66,078	65,400	**1,163 655**	--[3]
Ontario	178,268	258,600	**1,049 590**	**1.3 0.7**
Chino	89,829	120,400	**984 554**	**3.2 1.8**
Corona	168,101	172,300	**999 562**	**23.8 13.4**
Jurupa Valley	106,318	114,500	**1,113 626**	**13.67.7**
Norco	26,386	32,100	**954 537**	**16.7 9.4**

[1] Potential project-generated population growth based on up to 15 percent of project-generated employees relocating to each city and each city's respective average household size (California Department of Finance 2019).

[2] Project percentage of anticipated population growth based on potential project-generated growth and anticipated growth between 2019 population and 2040 population forecast.

[3] Eastvale's 2019 population currently exceeds its 2040 growth projection. Therefore, the project's potential percentage of forecast population growth for Eastvale cannot be calculated.

Average household size in Eastvale 4.17, Ontario 3.76, Chino 3.53, Corona 3.58, Jurupa Valley 3.99, Norco 3.42.

Source: California Department of Finance 2019; Southern California Association of Governments (SCAG) 2016.

Also see Response H-11.

Response H-13

The comment states that Draft EIR Section 4.6, *Hazards and Hazardous Materials*, provides inadequate analysis of potential impacts to hazards related to people living or working in airport influence area, as it does not provide sufficient evidence that the project will comply with the requirements associated with the project's location in Compatibility Zone C of the Chino Airport Influence Area.

As indicated in Draft EIR Section 4.6, *Hazards and Hazardous Materials*, Impact HAZ-4, the Riverside County Airport Land Use Commission will evaluate the project's consistency with the Airport Land Use Compatibility Plan (ALUCP), and the City Council is required to make a finding that the proposed Zone Change is consistent with the ALUCP. In addition, Draft EIR Section 4.8, *Land Use and Planning*, Impact LU-2, provides that the proposed buildings would fall within height limits and the proposed industrial uses are consistent with those allowed under Compatibility Zone C. Further, the Riverside County ALUC found that the project conforms with ALUC requirements. Individually, and collectively, these facts provide substantial evidence for the conclusions in the EIR.

Response H-14

The comment states that the Draft EIR Section 4.9, *Noise*, provides inadequate analysis of noise potential impacts to sensitive receptors as it does not include impacts to James Huber Park, approximately 640 feet from the project site, and should be revised to include impacts to this location.

The noise study analyzes worst-case conditions for noise sensitive residential receiver locations at varying distances from the project site; see Draft EIR, Appendix 4.9, Exhibits 8-A and 9-A. The unmitigated operational noise levels at all receiver locations ranged from 27.6 at receiver R3 to 38.2 dBA Leq at receiver R2. At 238 feet from the project site, receiver R3 represents the nearest noise sensitive receiver. At this distance, the unmitigated exterior noise levels are estimated at 43.7 and are well below the City of Eastvale 60 dBA Leq and 65 dBA Leq daytime exterior noise standards for noise sensitive residential use.

The James Huber Park is only considered a noise sensitive receptor during the daytime hours for active park use. James Huber Park is 640 feet from the project site and would experience unmitigated daytime noise levels of 39.1 dBA Leq and would satisfy the City of Eastvale 60 dBA Leq noise standards for noise sensitive land use. In addition, the existing noise level measurements in the project study area show that the background ambient noise levels range from 57.2 to 67.4 due to traffic noise on Archibald Avenue and will largely overshadow any project related operational noise level impacts.

Response H-15

The comment states that the construction noise reference measurements utilized in Draft EIR Section 4.9, *Noise*, are inadequate since the analysis utilizes nighttime noise reference levels for concrete mixers but the project does not include overnight construction. In addition, framing and grading noise reference levels were measured from residential construction sites and are not representative of industrial construction equipment and materials. The analysis should be revised to reflect this information.

To estimate the project's construction-related noise levels, sample reference noise level measurements of similar construction activities were collected by Urban Crossroads, Inc. to describe the different stages of construction. The reference noise levels are intended to represent typical construction noise levels when multiple pieces of equipment are operating simultaneously at a construction site. The construction noise analysis does not rely on any one reference noise level measurements but rather the highest reference noise level for a combination of construction activities for a given stage of construction.

The project construction noise analysis describes the potential impacts associated with concrete mixer pour and paving activities. The reference noise levels are intended to describe the expected concrete pour noise sources that may include concrete mixer truck movements and pouring activities, concrete paving equipment, rear mounted concrete mixer truck backup alarms, engine idling, air brakes, generators, and workers communicating/whistling. While the concrete mixer pour and paving activities reference noise levels were collected during nighttime activity, they accurately describe the source of activity for this stage of construction irrespective of the time of day in which it was collected.

In addition, many of the reference construction noise level measurements presented are not used in the actual construction noise analysis, including residential framing. While noise level measurement data is presented for residential framing activities, this reference noise level measurement is not used in the actual analysis of the project construction impacts.

Response H-16

The comment states that the analysis provided in Draft EIR Section 4.9, *Noise*, contains noise reduction credits for a stationary source drop-off rate of 6.0 A-weighted decibels (dBA) per doubling of distance and an estimated barrier attenuation from existing barriers in the project study area, but needs to provide evidence of the drop-off rate and type of sound barriers in the study area.

The noise study in Draft EIR, Appendix 4.9, provides detailed discussion on sound propagation and the use of the stationary source drop off rate of 6.0 dBA per doubling of distance in Sections 2.3, 9.3 and 10.1. Section 9.3 specifically outline the operational noise level calculation methodology.

> The operational noise level calculations, shown on Table 9-2, account for the distance attenuation provided due to geometric spreading when sound from a localized stationary source (i.e., a point source) propagates uniformly outward in a spherical pattern. Hard site conditions are used in the operational noise analysis which result in noise levels that attenuate (or decrease) at a rate of 6 dBA for each doubling of distance from a point source. The basic noise attenuation equation shown below is used to calculate the distance attenuation based on a reference noise level (SPL1):
>
> SPL2 = SPL1 - 20log(D2/D1)
>
> Where SPL2 is the resulting noise level after attenuation, SPL1 is the source noise level, D2 is the distance to the reference sound pressure level (SPL1), and D1 is the distance to the receiver location.

In addition, the calculations and methodology relying on the drop off rate 6.0 dBA per doubling of distance is considered standard industry practice.

Response H-17

The comment states that Draft EIR Section 4.11, *Transportation and Traffic*, analyzes impacts from seven proposed buildings which is inconsistent with the six proposed buildings stated in the project Description.

See also Response H-3.

Response H-18

The comment states that the Draft EIR and the TIA must include an analysis of the specific facilities providing direct access to the project site, since I-215 and I-15 provide direct access to the project site from the Southern California Logistics Airport.

The TIA follows accepted practices, consistent with City requirements for the facilities to include in the study, which includes I-15 facilities. No further evaluation is needed.

Response H-19

The comment states that Draft EIR Section 5.5, *Population and Housing*, utilizes uncertain language and should provide evidence to support its conclusion that future project employees would be existing residents of the region.

The Draft EIR can rely on obvious current and past employment trends for the area. The inland valley area of southern California is predominantly a continuous built environment, with municipalities largely juxtaposed to one another. Such is the case with Eastvale, which abuts the cities of Ontario, Chino, Corona, and Jurupa Valley. The average employee commutes 30 minutes to work. Since most cities in the project vicinity, including Eastvale, can be crossed within much less time than 30 minutes, it can be reasonably inferred that the majority of employees are not residing where they work. In addition, we note that the comment does not provide any substantial evidence to counter that future employees would be more likely to come from outside the region.

Response H-20

The comment states that Draft EIR Section 6.1, *Growth Inducement*, uses methodology to generate an employment estimate that is inconsistent with the Air Quality Analysis. The comment reiterates that the growth analysis utilizes uncertain language and lacks supporting evidence to demonstrate a less than significant conclusion regarding population growth in Eastvale and surrounding jurisdictions beyond comparing growth to respective SCAG population forecasts. Since the majority of project-induced growth would occur in the cities of Corona and Eastvale, the analysis should include the direct and indirect population increases from new housing and industrial/commercial projects from foreseeable projects in those cities to adequately analyze the project's cumulative impacts. Since the City of Eastvale has already exceeded its 2040 SCAG growth forecast, any growth related to the proposed project should be considered a significant impact.

As indicated the Draft EIR, Section 6.1.1, *Population Growth*, potential project-generated population growth would generally be within growth forecasts for nearby cities. Also see Response H-11, H-12, and H-19 on this subject.

Response H-21

The comment states that an amended EIR must be prepared and recirculated for public review in consideration of the aforementioned comments.

CEQA Guidelines Section 15088.5 outlines the requirements for recirculation of an EIR prior to recirculation:

(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:

   (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

   (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

   (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.

   (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish & Game Com.*(1989) 214 Cal.App.3d 1043).

(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

Based on the aforementioned comments and corresponding responses herein, there is no significant new information, as defined in CEQA Guidelines Section 15088.5, requiring recirculation of the EIR.

Emily Green

From: Gina Gibson-Williams <ggibson-williams@eastvaleca.gov>
Sent: Wednesday, March 11, 2020 11:00 AM
To: Jason Killebrew; Aaron Lobliner
Subject: FW: Homestead Industrial Project

GINA GIBSON WILLIAMS | Community Development Director
CITY OF EASTVALE | T: 951.361.0900 | D: 951.703.4425
12363 Limonite Avenue | Suite 910 | Eastvale, CA 91752
ggibson-williams@eastvaleca.gov | **eastvaleca.gov**

Connect with us on social media:
Facebook | Twitter | Instagram | LinkedIn | YouTube

From: adam salcido <asalcido.07@gmail.com>
Sent: Wednesday, March 11, 2020 8:49 AM
To: Gina Gibson-Williams <ggibson-williams@eastvaleca.gov>
Cc: Unknown <jbourg2271@aol.com>; jbourgeois029@gmail.com; Terrance Lucio <t.lucio57@gmail.com>; PATRICK HANINGER <phaninger1@gmail.com>
Subject: Homestead Industrial Project

[The e-mail below is from an external source. Please do not open attachments or click links from an unknown or suspicious origin.]

Good Morning Ms. Gibson-Williams,

Please provide any updates to the above mentioned project.

I am requesting under Public Resource Code Section 21092.2 to add the email addresses and mailing address below to the notification list, regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project.

t.lucio57@gmail.com

phaninger1@gmail.com

jbourg2271@aol.com

jbourgeois029@gmail.com

asalcido.07@gmail.com

H-1

Mailing Address:

P.O. Box 79222

Corona, CA 92877

H-1

Please confirm receipt of this email.

Thank You,

Adam Salcido

Letter I

COMMENTER: Adam Salcido

Response I-1

The comment requests the addition of email and mailing addresses to be included in the circulation list for project notices, reviews, and hearings.

The requested emails and mailing addresses were added to the project circulation list. No changes to the Draft EIR are required.

From: Alina Mullins <AMullins@aqmd.gov>
Sent: Tuesday, January 28, 2020 1:36 PM
To: Gina Gibson-Williams <ggibson-williams@eastvaleca.gov>
Cc: Lijin Sun <LSun@aqmd.gov>; Celia Diamond <cdiamond@aqmd.gov>
Subject: Technical Data Request: Homestead Industrial Project

Dear Ms. Gibson-Williams,

South Coast AQMD staff is in the process of reviewing the Draft Environmental Impact Report (Draft EIR) for the Proposed Homestead Industrial Project (South Coast AQMD Control Number: RVC200124-01). The public commenting period is from 01/24/2020 – 03/10/2020.

Upon review of the information sent to South Coast AQMD staff as a part of the public review period, I was able to access the Draft EIR and Appendix 4.2: Air Quality on the City's website. These documents do not include PDF versions of the CalEEMod and AERMOD inputs and outputs or the live modeling files used to generate CalEEMod and AERMOD runs. Please provide an electronic copy of the live modeling files that were used to generate CalEEMod and AERMOD (e.g., live input files), and any additional emission calculation spreadsheets used to quantify the air quality impacts, including the health risk, from construction and/or operation of the Proposed Project.
Celia Diamond)
You may burn the data onto a CD and send it to South Coast AQMD Attn: CEQA-Intergovernmental Review, to the address in my signature below. Or, you may send the above-mentioned documents via a Dropbox link in which they may

J-1

be accessed and downloaded by South Coast AQMD staff **no later than February 4th, 2020**. For downloading purposes, please add Ms. Celia Diamond, at cdiamond@aqmd.gov, as our contact to access the Dropbox link.

Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

Thank you,

Alina Mullins
Assistant Air Quality Specialist, CEQA IGR
Planning, Rule Development & Area Sources
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
P. (909) 396-2402
E. amullins@aqmd.gov
Please note that South Coast AQMD is closed on Mondays.

Letter J

COMMENTER: Alina Mullins, Assistant Air Quality Specialist, South Coast Air Quality Management District

Response I-1

The comment states that SCAQMD is in the process of reviewing the Draft EIR and requests specific air quality modelling files.

The requested files were previously provided in response to SCAQMD. The comment does not pertain to the adequacy of the EIR or the CEQA process. Therefore, no further response is required.

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3 Errata to the Draft EIR

This section presents specific changes to the text of the Draft EIR that have been made in response to comments, to clarify information presented in the Draft EIR.

These revisions are not considered significant new information that would trigger Draft EIR recirculation pursuant to *CEQA Guidelines* Section 15088.5. CEQA Guidelines Section 15088.5 outlines the requirements for recirculation of an EIR prior to recirculation:

(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.

(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish & Game Com.*(1989) 214 Cal.App.3d 1043).

(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

Based on the above guidance, there is no significant new information, as defined in CEQA Guidelines Section 15088.5, requiring recirculation of the EIR. Rather, the revisions correct, or clarify information presented.

3.1 Text Revisions to the Draft EIR

Where revisions to the main text are called for, the section and page are set forth, followed by the appropriate revision. Added text is indicated with **underlined** text. Text deleted from the Draft EIR is shown in ~~**strikethrough**~~. Page numbers correspond to the page numbers of the Draft EIR.

Executive Summary

Page ES-7, Table ES-1 (revised rows only):

Impact	Mitigation Measure (s)	Residual Impact
Air Quality		
The project would not generate growth which would exceed the AQMP forecasts. However, the project would generate NO_x emissions that exceed thresholds which could result in an increase in air quality violations and conflict with the AQMP. There is no feasible mitigation to reduce mobile NO_x emissions.	… **AQ-4 Electric Interior Vehicles.** All buildings shall be designed to provide infrastructure to support use of electric-powered forklifts and/or other interior vehicles. **AQ-5 Electric Hook Ups for Construction. During construction activity, electrical hook ups to the power grid for electric construction tools, such as saws, drills and compressors, and using electric tools shall be provided where feasible.** **AQ-6 Tier 4 Construction Equipment. For construction equipment greater than 50 horsepower (>50 HP), the Construction Contractor will make efforts to use off-road diesel construction equipment that complies with EPA/CARB Tier 4 emissions standards during all construction phases, if available. All construction equipment will be tuned and maintained in accordance with the manufacturer's specifications.**	Significant and unavoidable.
The project would not exceed SCAQMD thresholds for criteria pollutants during construction. During operation, the project would exceed SCAQMD thresholds for NO_x from mobile sources.	Mitigation Measures AQ-1 through **AQ-6** ~~**AQ-4**~~.	Significant and unavoidable.

1 Introduction

Page 1-1:

This Environmental Impact Report (EIR) has been prepared for a proposed industrial center located adjacent to Archibald Avenue and at the terminus of Limonite Avenue in the City of Eastvale, California. The proposed industrial project (hereafter referred to as the proposed project or project) would be constructed on a site currently occupied by a dairy farm. The project would involve demolition of the existing buildings, grading for site preparation, and development of **six** ~~**seven**~~ industrial use buildings totaling up to 1,080,060 square feet (sf), along with associated improvements (e.g., driveways, parking, detention facilities, etc.). The **six** ~~**seven**~~ buildings would range in size from 37,040 sf to 507,317 sf. The project would also include the extension of Limonite Avenue westward through the project site. The proposed project is described in detail in Section 2.0, *Project Description*.

4.2 Air Quality

Page 4.2-14:

The project would develop **six** ~~**seven**~~ industrial use buildings on an existing dairy farm. **The project does not involve the development of housing, and thus, would not directly increase population through the increase in housing stock.**

According to SCAG's 2016 RTP/SCS, the employment opportunities in Eastvale are expected to be 9,800 in 2040, an increase of 5,500 from 2012 (SCAG 2016). **In Riverside and San Bernardino County employment opportunities are expected to increase by 583,000 and 375,000 respectively. Employment needs are generally met on a regional basis, as most employees in Riverside and San Bernardino County commute more than 30 minutes per day. Thus, it's useful to consider employment on a regional basis.**

Using SCAG's estimated employee density for **the** associated land use **of *light manufacturing*** in Riverside **County**, the proposed project would create approximately 698 jobs, **while a *warehouse* land use would provide approximately 1,859 jobs,** as shown in Table 4.2-6 (SCAG 2001). **Given the differing sizes of the buildings, the project is likely to support both warehouse and other light industrial uses related to both of these classifications. Thus, employment resulting from the project would be expected to range from 698 to 1,859 jobs.** ~~**This represents about 12.7 percent of the projected employment growth in the City. In addition, the project would replace existing jobs at the dairy farm and the new employment opportunities at the industrial facilities would likely pull from the existing labor force in the City and region. Therefore, the project would not generate population and employment growth which would exceed forecasts**~~.

Table 4.2-1 Commercial Employee Generation Rates

Land Use	Employees per Square Foot	Proposed Square Footage	Total Employees
Light Manufacturing	1/1,548 sf	1,080,060	698
Warehouse	**1/581**	**1,080,060**	**1,859**

Source: Table 10A (SCAG 2001).

Table 4.2-7 provides employment projections for the City of Eastvale, and Riverside and San Bernardino Counties. The table also identifies the percent of the projected increase in employment that would be created by the proposed project. Project employment represents approximately 12.7 to 33.8 percent of the projected employment growth in the City; however, the project is likely to pull from the regional labor force beyond the City of Eastvale.

Project employment would represent less than one percent of the projected increase in employment for Riverside or San Bernardino Counties. Therefore, the project would not generate population and employment growth which would exceed SCAG forecasts.

Table 4.2-7 Commercial Employee Generation Rates

Jurisdiction	Employment		Increase		
	2010 (2012)[1]	2040 Projected	Jobs	Percent	% from Project
Eastvale	4,300	9,800	5,500	127.8	12.7 to 33.8
Riverside County	592,000	1,175,000	583,000	98.5	0.1 to 0.3
San Bernardino County	653,000	1,028,000	375,000	57.4	0.2 to 0.5

Source: SCAG 2016

1. The source document uses 2012 for cities and 2010 for counties.

While the project would not exceed growth forecasts in the area, the project would result in significant and unavoidable impacts associated with operational NO_x emissions from mobile sources; see discussion under Impact AQ-2 below. Implementation of Mitigation Measures AQ-1 through **AQ-6** ~~**AQ-4**~~ would reduce emissions to the extent feasible, but not to a level of less than significant due to the inability to regulate tailpipe emissions from vehicle trips generated by the project. Because the project would exceed SCAQMD thresholds for NO_x emissions during operation of the project, the project could result in an increase in frequency or severity of existing air quality violations or contribute to new violations and conflict with the AQMP. Therefore, the project would conflict with the AQMP and impacts would be significant and unavoidable.

Mitigation Measures

Implementation of Mitigation Measures AQ-1 through **AQ-6** ~~**AQ-4**~~ would reduce operational NO_x emission impacts to the extent feasible by implementing truck idling restrictions, promoting electric vehicles, implementing EV charging and designated carpool parking areas, and providing infrastructure for interior electric vehicles.

Significance After Mitigation

Implementation of Mitigation Measures AQ-1 through **AQ-6** ~~**AQ-4**~~ would not reduce NO_x emissions below SCAQMD thresholds, therefore, impacts to the adopted AQMP would be significant and unavoidable.

Page 4.2-17, Mitigation Measures:

AQ-5 Electric Hook Ups for Construction

During construction activity, electrical hook ups to the power grid for electric construction tools, such as saws, drills and compressors, and using electric tools shall be provided where feasible.

AQ-6 Tier 4 Construction Equipment

For construction equipment greater than 50 horsepower (>50 HP), the Construction Contractor will make efforts to use off-road diesel construction equipment that complies with EPA/CARB Tier 4 emissions standards during all construction phases, if available. All construction equipment will be tuned and maintained in accordance with the manufacturer's specifications.

4.8 Land Use and Planning

Page 4.8-8:

The proposed project has been designed to meet the regulations of the proposed zone. Each project parcel would comply with the minimum lot standards for area, width, and depth. The proposed buildings would comply with height, floor-area ratio, and setback regulations. Upon approval of the zone change, the **six** ~~**seven**~~ proposed industrial-use buildings, with landscaping and parking on **six** ~~**seven**~~ individual industrial lots would be consistent with the zoning ordinance. Impacts would be less than significant.

4.11 Transportation and Traffic

Page 4.11-1:

This section presents existing and future transportation/traffic conditions for the project study area and identifies potential transportation/traffic impacts resulting from implementation of the project. Study area circulation system facilities are discussed, and effects of project traffic on circulation system Level of Service (LOS) conditions are evaluated. Where the project would result in, or substantively contribute to, deficient LOS conditions, circulation system improvements are recommended. This section also includes an evaluation of vehicle miles travelled (VMT). The analysis herein is based on *The Homestead Traffic Impact Analysis* (TIA) and *The Homestead Vehicle Miles Travelled (VMT) Assessment*, prepared by Urban Crossroads, Inc. (2019e and 2019f) and included in Appendix 4.11. **The TIA evaluated a site plan based on a seven building layout totaling 1,080,000 square-feet of building area. The project site plan has since been revised to six buildings with a total square footage of 1,049,387. As indicated in Section 2.0, *Project Description*, see note in Table 2-2, the relative square-footage of each building is subject to change over the course of the planning process, however, the total square-footage would not exceed the 1,080,000 square feet used for evaluation purposes. Thus, the TIA and the analysis herein may refer to seven buildings. Nonetheless, the TIA conservatively addresses the impacts of the proposed project.**

4.11 Transportation and Traffic

Page 4.11-36:

The project TIA used these analyses to recommend specific improvements at the seven driveways which are proposed to allow access to the ~~**seven**~~ lots that make up the project site. Implementation of the improvements listed in the TIA and which were incorporated as part of the site design would preclude significant impacts with respect to project access, truck access, emergency access, and the potential for design-related hazards such as sharp curves or dangerous intersections.

4.13 Utilities and Service Systems

Page 4.13-9, Senate Bill 610:

> The project would involve the construction of more than 650,000 square feet of industrial space and, therefore, ~~**may require preparation of**~~ **requires** a WSA ~~**by JCSD**~~. **JCSD prepared a WSA (JCSD 2020) for the project, included in Appendix 4.13.** For the purposes of environmental review under CEQA, an analysis of water supply sufficiency is included below in Section 4.13.3, *Impact Analysis*.

Page 4.13-20, Operational Demand:

> The project would introduce a new industrial development containing **six** ~~**seven**~~ industrial use buildings covering a total of approximately 1,080,060 sf. Table 4.13-5 summarizes the projected water demand of the project based on recommended maximum demand factors for commercial and industrial development contained in the JCSD Standards Manual (JCSD 2011).

6 Other CEQA Required Discussion

Page 6-1, subsection 6.1.1, *Population Growth*:

> As discussed in Section 5, *Effects Found Not to be Significant*, the proposed project would not directly generate population growth because it does not include residential uses. However, the proposed industrial development would generate long-term operational employment. As discussed in Section 4.10, *Public Services*, and the following subsection, *Economic Growth*, the proposed project would generate approximately 1,049 jobs based on employment density factors for Light Industrial land uses utilized in the County of Riverside General Plan (Riverside County 2017). **In Draft EIR Section 4.2, *Air Quality*, SCAG employment factors and projects were also evaluated and identified a potential employment range of between 698 and 1,859 jobs, depending on the type of industrial or warehouse use.**
>
> As discussed in **Draft EIR** Section 5, *Effects Found Not to be Significant*, and **Section 4.2, *Air Quality*, Impact AQ-1,** it is expected that the project would largely absorb workers from the regional labor force and would not generally attract new workers to the region due to the current unemployment rate in Riverside County. A small proportion of new workers attracted to the area as a result of project employment are likely to settle within Eastvale or one of the adjacent cities of Ontario, Chino, Corona, Jurupa Valley, or Norco. Table 6-1 summarizes potential population growth in Eastvale and surrounding communities based on the project's employment generation, each city's average household size, and ~~**an**~~ **a conservative** assumption that up to 15 percent of project-generated employees (**279** ~~**157**~~ employees) and their families would move into any single community.

Table 6-2 Potential Project-Generated Growth in Eastvale and Surrounding Cities

City	2019 Population	2040 Population Forecast	Potential Project-Generated Population Growth[1]	Project Percentage of Anticipated Population Growth (%)[2]
Eastvale	66,078	65,400	**1,163** ~~655~~	--[3]
Ontario	178,268	258,600	**1,049** ~~590~~	**1.3** ~~0.7~~
Chino	89,829	120,400	**984** ~~554~~	**3.2** ~~1.8~~
Corona	168,101	172,300	**999** ~~562~~	**23.8** ~~13.4~~
Jurupa Valley	106,318	114,500	**1,113** ~~626~~	**13.6**~~7.7~~
Norco	26,386	32,100	**954** ~~537~~	**16.7** 9.4

[1] Potential project-generated population growth based on up to 15 percent of project-generated employees relocating to each city and each city's respective average household size (California Department of Finance 2019).

[2] Project percentage of anticipated population growth based on potential project-generated growth and anticipated growth between 2019 population and 2040 population forecast.

[3] Eastvale's 2019 population currently exceeds its 2040 growth projection. Therefore, the project's potential percentage of forecast population growth for Eastvale cannot be calculated.

Average household size in Eastvale 4.17, Ontario 3.76, Chino 3.53, Corona 3.58, Jurupa Valley 3.99, Norco 3.42.

Source: California Department of Finance 2019; Southern California Association of Governments (SCAG) 2016.

Page 6-4, subsection 6.2, *Irreversible Environmental Effects*:

The proposed project involves construction and operation of an industrial development on a currently operational dairy in Eastvale. Construction and operation of the project would involve an irreversible commitment of construction materials and non-renewable energy resources. The project would involve the use of building materials and energy, some of which are non-renewable resources, to construct the **six** ~~**seven**~~ proposed industrial buildings totaling 1,080,060 square feet, Limonite Avenue extension, parking areas, and utility/drainage improvements. Consumption of these resources would occur with any development in the region, and are not unique to the proposed project.

8 References

Page 8-7:

Jurupa Community Services District (JCSD). 2020. *Water Supply Assessment*, Homestead Industrial Project, City of Eastvale. Prepared by Albert A. Webb Associates. January.

Appendix 4.13

A new appendix includes the project-specific Water Supply Assessment for the project.

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Appendix 4.13

Water Supply Assessment

ALBERT A. WEBB ASSOCIATES

WATER SUPPLY ASSESSMENT

HOMESTEAD INDUSTRIAL PROJECT
CITY OF EASTVALE

Prepared for:

jurupa COMMUNITY SERVICES DISTRICT

January 27, 2020

ALBERT A. WEBB ASSOCIATES

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3788 McCray Street
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W.O. 2019-0263

January 27, 2020

Seungwon Won, Ph.D., P.E.
Development Engineer
JURUPA COMMUNITY SERVICES DISTRICT
11201 Harrel Street
Jurupa Valley, CA 91752

Re: Water Supply Assessment for Homestead Industrial Project

Dear Mr. Won,

Pursuant to your Notice to Proceed given on December 5, 2019, and the City's provision of a current site plan and project description on December 18, 2019, transmitted herewith is the Water Supply Assessment of the subject project pursuant to SB 610. Please note that the Appendices are provided electronically on the enclosed CD.

Sincerely,

ALBERT A. WEBB ASSOCIATES

Autumn DeWoody
Senior Environmental Analyst

Sam I. Gershon, RCE
Senior Vice President

TABLE OF CONTENTS

TABLES

FIGURES

APPENDICES (available on CD enclosed)

A. *Jurupa Community Services District 2015 Urban Water Management Plan.* Prepared by Albert A. Webb Associates. June 27, 2016.

B. Chino Basin Desalter Authority. *2015 Urban Water Management Plan.* Prepared by Water Resources Planning. June 2016.

C. Chino Basin Desalter Authority. January 2011. *Amended and Restated Water Purchase Agreement by and between Chino Basin Desalter Authority and The Jurupa Community Services District.*

D. September 2014. *Amendment No. 8 to Groundwater Storage Program Funding Agreement No. 49960.*

E. November 2014. *Agreement by and between the City of Ontario and Jurupa Community Services District.*

F. January 1978. Judgment, *Chino Basin Municipal Water District v. City of Chino, et al., San Bernardino Ct. No. 164327.*

G. April 1969. Judgment, *Orange County Water District v. City of Chino, et al., Superior Court for the State of California for the County of Orange No. 117628.*

H. April 1969. Judgment *Western Municipal Water District, et al. v. East San Bernardino County Water District.*

I. 2015 Inter-Agency *Operating Agreement for Use of the JCSD-RCSD Jewel Street Booster Station and Pipeline Interconnection.*

J. Inland Empire Utilities Agency and Water Facilities Authority, *2015 Urban Water Management Plan.* Prepared by Arcadis. June 2016.

K. The Metropolitan Water District of Southern California (MWD*), 2015 Urban Water Management Plan.* June 2016.

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SECTION 1 - INTRODUCTION

1.1 Purpose

In October of 2001, Senate Bill 610 (SB 610) was signed into California state law with an effective date of January 1, 2002. SB 610 amended existing legal requirements for confirmation of water supply sufficiency as a condition of approval for development projects. The confirmation of water supply sufficiency is achieved through an assessment of the water purveyor's existing and future water sources, and existing and projected water demand in relation to a "project" as defined by SB 610, resulting in the production of a project-specific Water Supply Assessment ("WSA" or "Assessment"). Additional analysis is required in the WSA if any portion of the water purveyor's water supplies include groundwater. The WSA is prepared and adopted by the water supplier and included in the California Environmental Quality Act (CEQA) analysis for the project. The CEQA Lead Agency must then independently determine, based on the entire record, whether water supplies will be sufficient to satisfy the demands of the project, in addition to existing and planned future uses (California Water Code [CWC] section 10911).

Law

Water Code section 10910:

> *(a) Any city or county that determines that a project, as defined in Section 10912, is subject to the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code) under Section 21080 of the Public Resources Code shall comply with this part.*

Water Code section 10912:

For the purpose of this part, the following terms have the following meanings:

> *(a) "Project" means any of the following:*

(1) A proposed residential development of more than 500 dwelling units.

(2) A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.

(3) A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.

(4) A proposed hotel or motel, or both, having more than 500 rooms.

(5) A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.

(6) A mixed-use project that includes one or more of the projects specified in this subdivision.

(7) A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

1.2 Proposed Project

This WSA has been prepared for the Homestead Industrial project ("Project"), which is located west of the intersection of Archibald Avenue and Limonite Avenue, in the City of Eastvale (City) within Riverside County (see **Figure 1-1, Regional Location** and **Figure 1-2, Project Vicinity** located at the end of this section). The Project site is approximately 56 acres (gross) and currently operating as a dairy farm with several residences (**Figure 1-3, Project Site Location**). The Project encompasses the following Assessor's Parcel Numbers: 144-010-015, 144-010-018, 144-010-020, 144-010-023, and 144-010-032. The Project site is bound to the north by County Line Channel/Bellegrave Avenue and Cucamonga Creek Flood Control Channel to the west.

Jurupa Community Services District (JCSD) is the water supplier for the Project site. The City requested this WSA from JCSD on December 4, 2019. JCSD commissioned this Assessment from Albert A. Webb Associates (WEBB) on December 5, 2019 to answer the following key question per SB 610: whether the projected supply for the

next 20 years, based on normal, single dry and multiple dry years, will meet the demand projected for the project plus existing and planned future uses, including agricultural and manufacturing uses.

The Project proposes the construction of an industrial park containing six industrial use buildings totaling up to 1,080,060 square feet (SF) (**Figure 1-4, Homestead Conceptual Site Plan**). The Project would include the extension of Limonite Avenue within the Project limits, and include improvements to the Archibald Avenue frontage, and the Archibald Avenue/Limonite Avenue intersection (Rincon, p. 2-14). The proposed buildings would range in size from 48,125 SF to 507,317 SF as shown in **Table 1-1**. Each building would feature office space and dock doors, and range in height from 30 feet to 40 feet tall. Buildings 1, 2, 3, and 4 would be located north of Limonite Avenue and Buildings 5 and 6 would be located south of Limonite Avenue. (Rincon, p. 2-7)

Table 1-1: Homestead Project Land Use Summary

	Bldg. 1	Bldg. 2	Bldg. 3	Bldg. 4	Bldg. 5	Bldg. 6	Total
Site Area							
In SF	388,118	147,190	109,821	349,863	223,256	944,809	2,163,057
In ac	8.91	3.38	2.52	8.03	5.13	21.69	49.66
Net Dedication Area (ac)							6.20 ac
Gross Total Site Area (ac)							55.86 ac
Building Area (SF)							
Footprint	182,018	59,067	45,625	151,867	84,679	497,631	1,020,887
Office	10,000	5,000	3,000	8,000	5,000	10,000	41,000
Mezzanine	5,000	5,000	2,500	4,000	2,000	10,000	28,500
Warehouse	172,018	54,067	42,625	143,867	79,679	487,631	979,887
Total Building Area [a]	187,018	64,067	48,125	155,867	86,679	507,631	1,049,387
Coverage [b]	46.9	40.1	41.5	43.4	37.9	52.7	48.5
Clear Building Height (feet)	36	30	30	36	30	40	--

Notes: From HPA Architecture, Sheet DAB-A1.0, *Master Site Plan for The Homestead,* Orbis Real Estate Partners, Dec. 17, 2019. Any calculation errors herein are carried over verbatim from the site plan provided.
SF = square feet; ac = acre; FAR = floor-to-area ratio
(a) Footprint plus Mezzanine areas.
(b) Footprint divided by Site Area.

The Project site currently has a General Plan (GP) land use designation of Light Industrial (L-I). The site is zoned Heavy Agriculture (A-2) as defined by the City's Zoning Ordinance. The Project would require a zone change from Heavy Agriculture (A-2) to Industrial Park (I-P) to comply with the City Zoning Ordinance and conform to the GP land use designation. The L-I land use designation is defined by the City as follows:

> (0.25-0.60 FAR) The Light Industrial land use designation allows for a wide variety of industrial and related uses, including assembly and light manufacturing, repair and other service facilities, warehousing, distribution centers, and supporting retail uses. Accessory uses also include day-care, public meeting rooms, and other community-oriented facilities. (GP 2012, p. 3-12)

Because the City General Plan allows up to 0.60 FAR for the Project site, that would allow a development intensity of up to approximately 1,297,914 SF. As shown in Table 1-1, the Project proposes 1,049,387 SF of total building area.

According to information that was provided to JCSD from the applicant for this Assessment, the landscape plan plant palette will feature drought-tolerant plants in compliance with Eastvale Municipal Code (EMC) Section 120.05.040 (Rincon, p. 2-10). The Project would be equipped with a low flow irrigation system to meet state-mandated AB 1881 (Model Water Efficient Landscape Ordinance) requirements (Rincon, p. 2-14).

JCSD is investigating the potential use of non-potable water for the Project area and will require the developer to participate in the final adopted program for parks and greenbelt areas (Webb 2019, p. 2). For the purposes of this WSA, it is assumed that only potable water will be available to meet all the water demand for the Project.

1.3 Project Relation to Urban Water Management Plan

JCSD is the water supplier for the Project and has prepared a 2015 UWMP, a copy of which is provided in Appendix A. The 2015 UWMP was adopted by JCSD Board of

Directors on June 27, 2016 and reviewed by the state Department of Water Resources (DWR). The 2015 UWMP assumptions on growth projections within the service area were derived from an analysis of the additional water demand from the land uses assigned to vacant parcels by City-approved General Plans that could be developed in the future (UWMP, p. 4-3). As part of this Assessment, WEBB has confirmed with JCSD that there have been no substantial changes to the water supply portfolio as described in the 2015 UWMP.

Law

Water Code Section 10910:

> *(c) (1) The city or county, at the time it makes the determination required under Section 21080.1 of the Public Resources Code* [CEQA]*, shall request each public water system identified pursuant to subdivision (b) to determine whether the projected water demand associated with a proposed project was included as part of the most recently adopted urban water management plan adopted pursuant to Part 2.6 (commencing with Section 10610).*
>
> *(2) If the projected water demand associated with the proposed project was accounted for in the most recently adopted urban water management plan, the public water system may incorporate the requested information from the urban water management plan in preparing the elements of the assessment required to comply with subdivisions (d), (e), (f), and (g).*
>
> *(3) If the projected water demand associated with the proposed project was not accounted for in the most recently adopted urban water management plan, or the public water system has no urban water management plan, the water supply assessment for the project shall include a discussion with regard to whether the public water system's total projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection will meet the projected water demand associated with the proposed project, in addition to the*

public water system's existing and planned future uses, including agricultural and manufacturing uses.

(4) If the city or county is required to comply with this part pursuant to subdivision (b), the water supply assessment for the project shall include a discussion with regard to whether the total projected water supplies, determined to be available by the city or county for the project during normal, single dry, and multiple dry water years during a 20-year projection, will meet the projected water demand associated with the proposed project, in addition to existing and planned future uses, including agricultural and manufacturing uses.

As discussed further in Section 3 – Water Supply Analysis, JCSD is a member agency of the Chino Basin Desalter Authority (CDA), a Joint Exercise of Powers Agency from which JCSD purchases treated groundwater from the Chino Groundwater Basin. CDA has prepared a 2015 UWMP which is provided in Appendix B.

1.4 Statewide and Local Water Conservation Efforts

Governor Brown proclaimed a statewide State of Emergency due to ongoing drought conditions on January 17, 2014. Since then, at least six Executive Orders and other Proclamations have been issued in response to impacts from extended statewide drought conditions. Executive Order B-37-16 issued on May 9, 2016, established a new water use efficiency framework for California. The order established longer-term water conservation measures that include permanent monthly water use reporting, new urban water use targets, reducing system leaks and eliminating wasteful practices, strengthening urban drought contingency plans and improving agricultural water management and drought plans. On April 7, 2017, Governor Brown issued Executive Order B-40-17 that ended the drought state of emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne. The Executive Order maintains the mandatory water reporting requirements and prohibitions on wasteful practices contained in Executive Order B-37-16, as described previously. In a related action,

state agencies released a plan to implement Executive Order B-37-16 entitled, "Making Water Conservation a California Way of Life."

JCSD adopted Ordinance No. 389 on May 26, 2015 containing the Water Conservation Program and water waste ordinance in response to Emergency Conservation Regulations mandated by the State Water Resources Control Board. Ordinance 389 states that water conservation measures shall be in effect at all times and shall be subject to penalties as appropriate (UWMP, p. 9-1). On July 24, 2017, the JCSD Board of Directors unanimously approved remaining at Level 2 of the District's Water Conservation Program. As such, customers must continue to follow mandatory, year-round water use efficiency best practices (JCSD Web site).

The City of Eastvale adopted the Water Efficient Landscape Regulations on January 13, 2016 which are codified in Chapter 14.24 of the Eastvale Municipal Code (EMC). The intent of this chapter is to (EMC 14.24.010):

1) "Establish provisions for water management practices and water waste prevention.
2) Establish a structure for planning, designing, installing, maintaining, and managing water efficient landscapes in new and rehabilitated projects.
3) Reduce the water demands from landscapes without a decline in landscape quality or quantity.
4) Retain flexibility and encourage creativity through appropriate design.
5) Ensure the attainment of water efficient landscape goals by requiring that landscapes serviced by potable water not exceed a maximum water demand of 55 percent or 0.55 of the reference evapotranspiration (ETo).
6) Ensure the attainment of water efficient landscape goals by allowing landscapes serviced entirely by recycled water to utilize 85 percent or 0.85 of the ETo.
7) Eliminate water waste from overspray and/or runoff.
8) Implement the requirements of the California Water Conservation in Landscaping Act 2006, California Code of Regulations Title 23, Division 2,

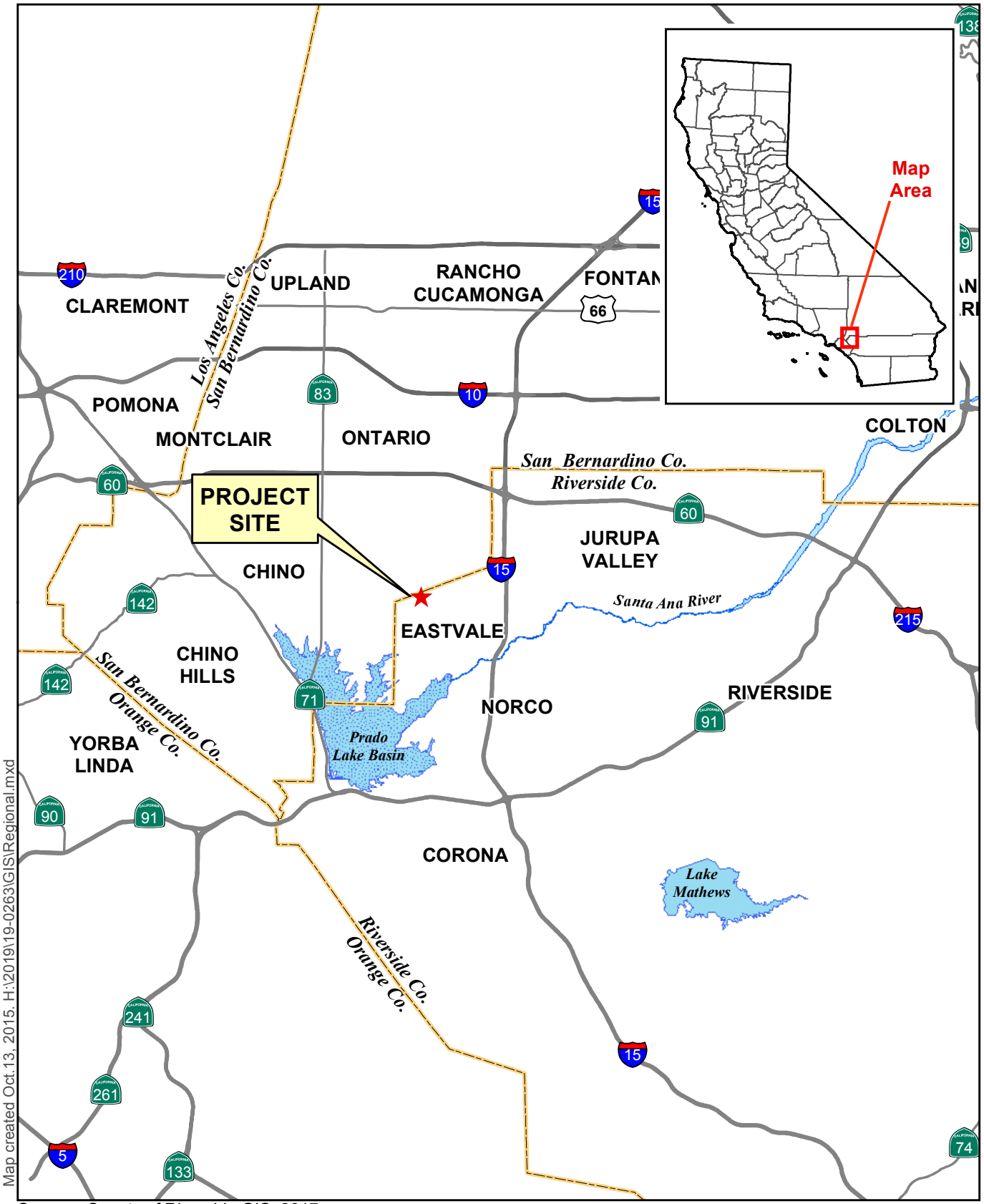
Chapter 2.7, and Executive Order B-29-15 issued by Governor Brown on April 1, 2015.

9) Promote water conservation in new residential subdivision landscapes by reducing the amount of natural turf (grass lawns) in the front yards of new homes to 30 percent of the landscape area if cool season turf grass is installed, by 50 percent if warm season turf grass is installed, and by promoting appropriate use of lower water use plants and inert materials for a sustainable landscape design. All areas of natural turf must meet the maximum applied water allowance as described in section 14.24.080, water budget.
10) Prohibit the new installation of natural turf grass in medians and parkways within and along city-maintained roads."

These requirements are applicable to all new and rehabilitated landscapes associated with nonresidential uses which require a permit and/or approval by the City (EMC 14.24.030).

1.5 Methodologies of Analysis

This Assessment follows the report outline suggested by the DWR *Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 of 2001* (DWR 2003). Section 1 of this Assessment describes the existing and proposed land use designations of the project site, the proposed project's relation to the water supplier's most recent UWMP, and a review of statewide conservation requirements. Section 2 provides the water demand analysis of both the project site and the JCSD service area, Section 3 reviews the projected water supplies for the project and the JCSD; Section 4 contains the required discussion of JCSD's groundwater supplies; and Section 5 concludes the Assessment by answering the primary question at hand.



Map created Oct.13, 2015. H:\2019\19-0263\GIS\Regional.mxd

Source: County of Riverside GIS, 2017

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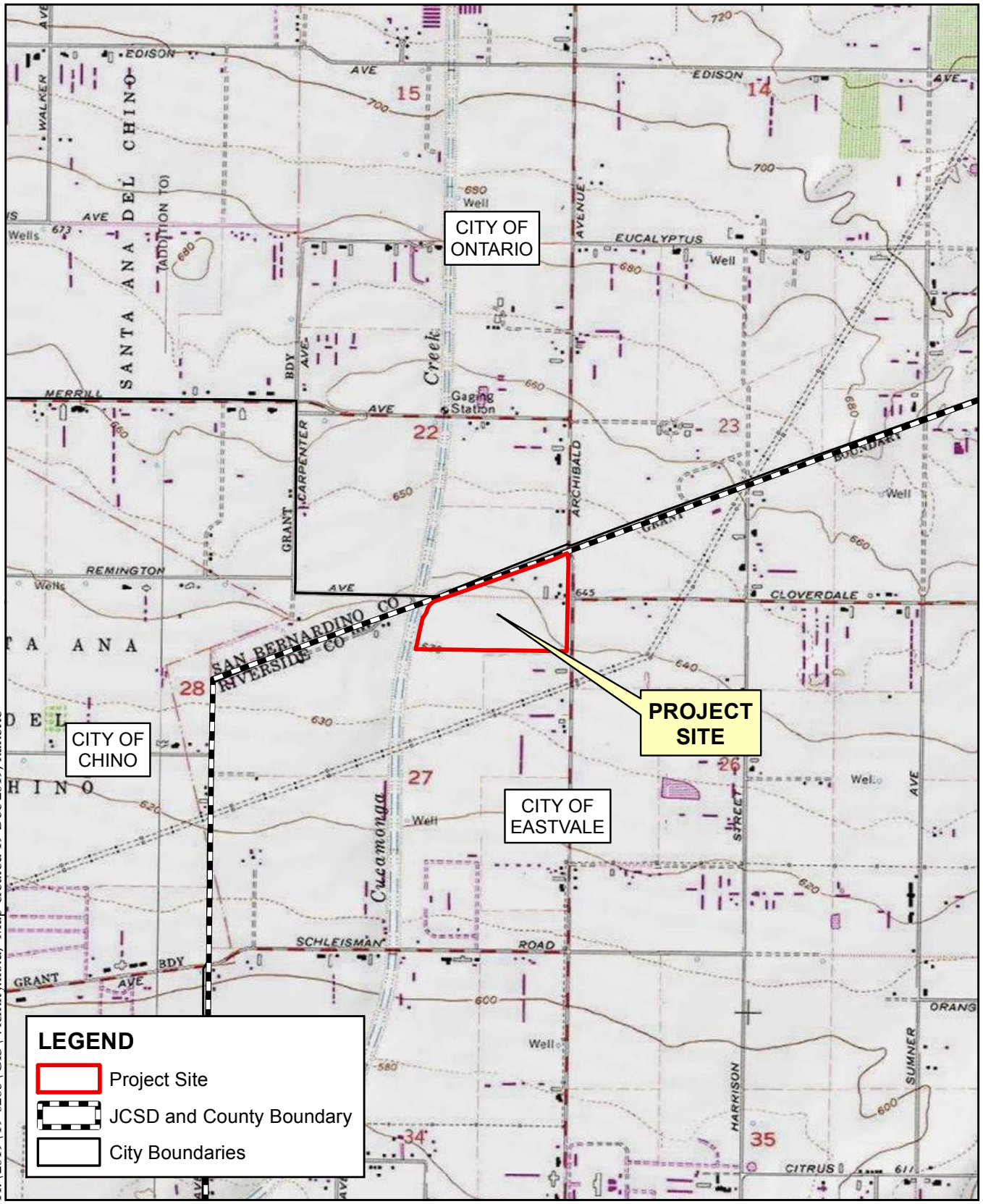
Figure 1-1 – Regional Location

Homestead Industrial WSA

ALBERT A. WEBB ASSOCIATES



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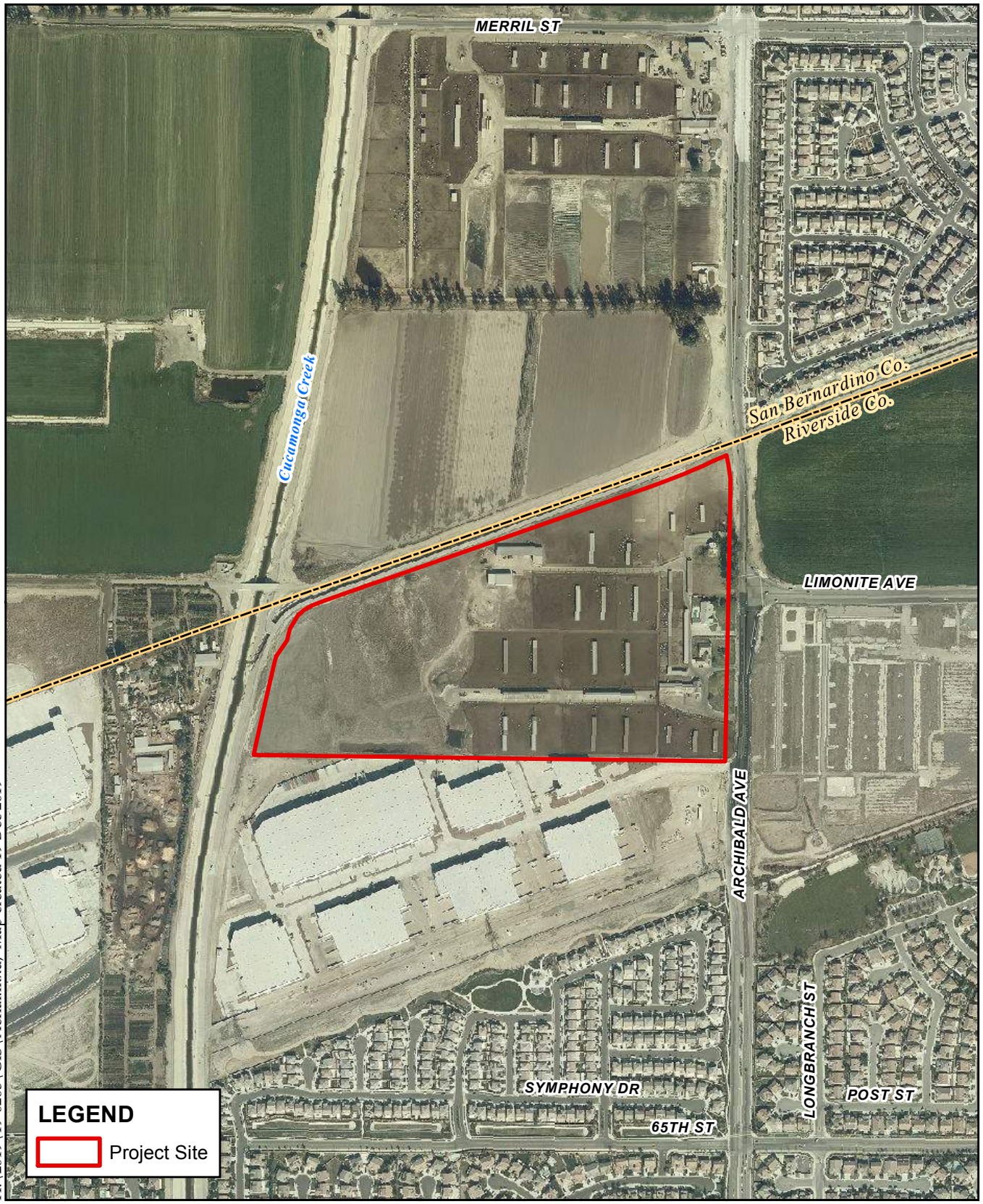
Sources: ESRI / USGS 7.5min Topo;
Riverisde Co. GIS, San Bernardino Co. GIS

0 1,000 2,000 3,000 Feet

Figure 1-2 - Project Vicinity

Homestead Industrial WSA

ALBERT A. WEBB ASSOCIATES



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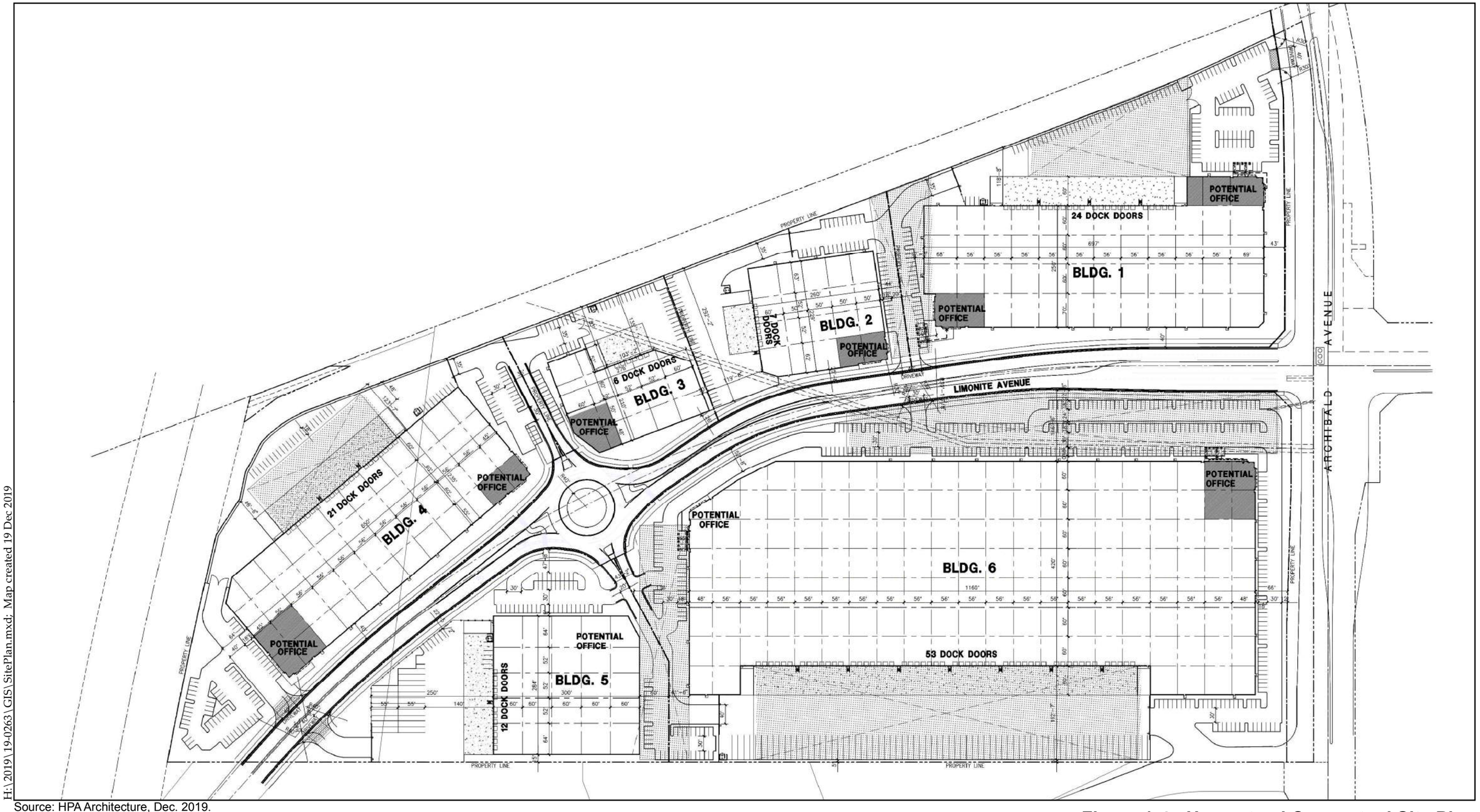
Sources: Riverside Co. GIS, 2019;
San Bernardino Co. GIMS, 2018 (imagery).

0 500 1,000 1,500 Feet

Figure 1-3 - Project Site Location

Homestead Industrial WSA

ALBERT A. WEBB ASSOCIATES



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Source: HPA Architecture, Dec. 2019.

Not to Scale

Figure 1-4 - Homestead Conceptual Site Plan

Homestead Industrial WSA

ALBERT A. WEBB ASSOCIATES

SECTION 2 - WATER DEMAND ANALYSIS

The purpose of this section is to evaluate whether the proposed project was considered in the water supplier's planning for water demand. This section will: 1) identify the various water use sectors, 2) identify water demand by those sectors for the next twenty years, and 3) compare the calculated water demand of the proposed Project to the water demand assumed in the most recent Urban Water Management Plan (UWMP) for the same property.

Law

Water Code Section 10910:

(c) (2) (2) If the projected water demand associated with the proposed project was accounted for in the most recently adopted urban water management plan, the public water system may incorporate the requested information from the urban water management plan in preparing the elements of the assessment required to comply with subdivisions (d), (e), (f), and (g).

(3) If the projected water demand associated with the proposed project was not accounted for in the most recently adopted urban water management plan, or the public water system has no urban water management plan, the water supply assessment for the project shall include a discussion with regard to whether the public water system's total projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection will meet the projected water demand associated with the proposed project, in addition to the public water system's existing and planned future uses, including agricultural and manufacturing uses.

2.1 Demographic Factors

A variety of demographic factors may affect water use. The Urban Water Management Planning Act lists several demographic factors to be detailed in UWMP's including

climate, current and projected population, density, and the mix of customer types (CWC sections 10631(e)(1)-(2)). As suggested by DWR, these data are provided herein and are taken generally from the Jurupa Community Services District's (JCSD or District) latest UWMP (2015).

Climate

JCSD's service area is located within the greater Chino Basin valley, which is generally semi-arid and warm. Summers are dry with average temperatures as high as 95ºF and maximum daily temperatures that sometimes exceed 100ºF. Winters are cool with average temperatures as low as 40ºF. As stated in the UWMP, average annual rainfall between 2001-2015 was approximately 8 inches per year, whereas the historical average rainfall from 1908-1988 was approximately 13 inches per year. Recent rainfall measured from 2016 to 2019 at U.C. Riverside had an annual average of 9 inches per year. The elevations within the service area range from 368 feet to 2,210 feet above mean sea level. (UWMP, p. 3-9)

Population

The City of Eastvale and approximately 70 percent of the City of Jurupa Valley make up the JCSD service area. Each year the JCSD Board of Directors adopts a population estimate for the District service area; in 2019, the estimated population is 137,305 persons, which includes the Swan Lake Mobile Home Park (not yet within the service area) in Eastvale. Population projections from the UWMP are shown in **Table 2-1**. Based on each City's General Plans and anticipated development patterns, JCSD service area population at buildout in 2040 is estimated at 157,290 persons. (UWMP, p. 3-12)

Table 2-1: JCSD Service Area Population, 2015-2040

	2015	2020	2025	2030	2035	2040 [a]
Service Area Population	119,034	127,004	134,974	142,944	150,914	157,290

Source: UWMP, Table 3-1, p. 3-12.
(a) Service area buildout is estimated to happen by 2040.

JCSD actively tracks the status of properties within their service area as they develop (e.g. whether residential or non-residential; vacant, proceeding through development process, or under construction; undeveloped or inactive) for the primary purpose of forecasting future water demand. At the time the 2015 UWMP was prepared, there were approximately 931 acres of residential properties and 455 acres of commercial/industrial properties that were actively proceeding through the development process, in plan-check, or under construction. Undeveloped residential and non-residential properties within the service area totaled 1,111 acres and 1,191 acres, respectively. (UWMP, pp. 3-13/3-14)

2.2 JCSD Water Demand

The most recently reported data from JCSD to the state is for calendar year (CY) 2018. As of 2018, JCSD delivered to its customers approximately 24,489 acre-feet (AF) of potable water and 814.99 AF of non-potable water for a total of approximately 25,304 AF. The recorded the projected water demands by customer type for the JCSD service area are provided below in **Table 2-2**.

Table 2-2: Recorded and Future Water Demand (AFY)

Customer Type	2015	2018	2020	2025	2030	2035	2040
Single Family Residential [a]	14,286	16,869	15,700	17,341	19,153	21,154	23,364
Multifamily Residential	1,236	1,400	1,359	1,501	1,657	1,830	2,022
Commercial [b]	2,185	2,505	3,119	3,444	3,804	4,202	4,641
Industrial [c]	653	631					
Landscape	2,141	2,812	2,353	2,599	2,870	3,170	3,502
Other [d]	989.6	272	665	735	811	896	990
Losses [e]	351.4	--	1,189	1,314	1,451	1,602	1,770
Total Potable	**21,842**	**24,489**	**24,385**	**26,934**	**29,746**	**32,854**	**36,289**
Non-Potable Landscape	539	815	592	654	722	797	881
Total Demand	**22,381**	**25,304**	**24,977**	**27,588**	**30,468**	**33,651**	**37,170**

Source: UWMP, p. 4-1 and UWMP errata. 2018 data from JCSD 2020.
(a) Includes water-only customers that do not have sewer service with JCSD.
(b) Includes governmental/institutional and non-billing meters for commercial landscape irrigation.
(c) From 2020-2040, commercial, industrial, and institutional (CII) are combined.
(d) Includes fire hydrants for fire suppression, dust control, and construction. Includes line breaks.
(e) From 2020-2040, includes non-potable losses with potable losses.
AFY = acre-feet per year

The water demand projections in the UWMP are based on site development information tracked by the District that includes the underlying or known land use designations and the where the project (if any) is in the development process with the respective city. Specifically, the assigned land use designations of undeveloped properties. These assumptions projected an increase of 9,460 AFY of potable water consumption for the service area by buildout (i.e. 2040) (UWMP, p. 4-3). Further, JCSD determined, using a recent water capacity rate study (Carollo, 2016) that this increase in water demand would be equivalent to 15,753 additional Meter Equivalent Units (MEU)[1] in addition to the existing (2015) estimate of 42,421 MEUs in the service area.

[1] One MEU represents a typical, single family residential customer with a 5/8x3/4-inch meter. Larger customers, such as apartment complexes or manufacturing facilities are assigned a higher number of MEUs based on their meter size and flow rates to better represent the capacity ratio of their potential demand on the water system. Every account, existing and future, is assigned several MEIs to represent how many typical customers it is equivalent to (Carollo [2016], sec. 3.1.2)

To reach that, an average annual growth rate of 2 percent per year across all customer types was assumed (UWMP, p. 4-3).

The City of Eastvale makes up 30 percent of the JCSD service area and Eastvale is nearly built-out. JCSD anticipates buildout of the City within the next 10 years, and buildout of the service area by approximately 2040.

JCSD currently does not have the ability to distribute recycled water to its customers. Because JCSD plans to provide this service to customers in the future, JCSD is working with neighboring agencies to develop ways to purchase and distribute recycled water, pending funding availability. The 2015 UWMP plans for 500 AFY of recycled water being available for landscape irrigation (excluding golf courses) from 2020 to 2040 (p. 6-28).

This WSA is required by the Water Code to address demand from existing and planned future uses, including agricultural and manufacturing uses (CWC 10910(c)(1)(4)). Agricultural activities have decreased in the JCSD service area as a result of planned urbanization according to approved city land use plans (UWMP, p. 7-3). JCSD expects water use for agricultural activities to continue declining and potentially replaced with non-potable sources. As shown in Table 2-2, JCSD expects an increase in the water demands from commercial and industrial properties combined, consistent with known projects and approved city land use plans.

2.3 Project Site Land Use Assumed in the UWMP

In the UWMP, the Project site was assumed to be a future industrial site based on the underlying General Plan land use designation of L-I. The site was also assumed to be undeveloped and inactive (meaning no availability letter, not in plan check, and not under construction) (UWMP, Fig. 3-4). Water demand projections in the UWMP were based on undeveloped properties and their underlying General Plan designations (UWMP, p. 4-3). Because the proposed Project is consistent with the General Plan land use designation for the site, the Project is consistent with the land use type assumed in the 2015 UWMP.

2.4 Project Water Demand

To calculate individual project water demands, JCSD currently uses the "Unit Values of Applied Water" from Table 5-1 of JCSD's Draft Master Water Plan (dated October 2005). Based on said table, JCSD uses a unit water demand factor of 1.52 AFY per acre (0.94 gallons per minute [gpm] per acre) for industrial land uses. Because the proposed Project would result in 49.66 net acres of industrial park uses (Table 1-1), the Project water demand is estimated to be 75 AFY, as shown in **Table 2-3**.

Table 2-3: Water Demand for Homestead Industrial Project

Existing & Proposed Land Use	Proposed Net Area	Potable Unit Water Demand Factor [a]	Project Potable Water Demand	
			Daily	Total Annual
Industrial Park	49.66 acres	1.52 AFY/acre (0.94 gpm/acre)	67,220 gpd	75 AFY

Notes:
(a) Unit Values of Applied Water" from Table 5-1 of JCSD's *Draft Master Water Plan* dated October 2005.
gpm = gallons per minute; gpd = gallons per day; AFY = acre feet per year

JCSD is investigating the potential use of non-potable water for the Project area and will require the developer to participate in the final adopted program for parks and greenbelt areas (Webb 2019, p. 2). For the purposes of this WSA, it is assumed that only potable water will be available to meet the water demands for the Project.

Conclusion

The land use types that were used in the 2015 UWMP water demand projections, including the Project site, assumed the same land use type which is proposed by the Project. Therefore, the Project's water demands were accounted for in the most recent UWMP. Based on the District's current unit water demand factors, the Project will generate a potable water demand of approximately 75 AFY (Table 2-3). The Project proposes a total building area (1,049,387 SF) that is less than the maximum permitted by the City of Eastvale's General Plan (1,297,914 SF).

SECTION 3 - WATER SUPPLY ANALYSIS

This section identifies the sources of potable water utilized and available to Jurupa Community Services District (JCSD or District), which is the water supplier for the proposed Homestead Industrial project (Project), The purpose of this section is to evaluate the water supplies that could be utilized by the proposed Project during normal, single-dry and multiple-dry water years during a 20-year projection.

Law

Water Code Section 10910 (d)(1)*:*

The assessment required by this section shall include an identification of any existing water supply entitlements, water rights, or water service contracts relevant to the identified water supply for the proposed project, and a description of the quantities of water received in prior years by the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), under the existing water supply entitlements, water rights, or water service contracts.

(2) An identification of existing water supply entitlements, water rights, or water service contracts held by the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), shall be demonstrated by providing information related to all of the following:

(A) Written contracts or other proof of entitlement to an identified water supply.

(B) Copies of a capital outlay program for financing the delivery of a water supply that has been adopted by the public water system.

(C) Federal, state, and local permits for construction of necessary infrastructure associated with delivering the water supply.

(D) Any necessary regulatory approvals that are required in order to be able to convey or deliver the water supply.

3.1. Documenting Wholesale Water Supplies

Many retail water suppliers in California, including JCSD, receive supplies from one or more water wholesalers. SB 610 requires this Assessment to document wholesale supplies received, by: i) describing the quantities of water received from each wholesaler in prior years; ii) identifying existing entitlements, water rights, and/or water service contracts held by the District for the wholesale supply; iii) provide proof of entitlements, water rights, service contracts, relevant capital outlay programs, and construction permits for necessary infrastructure to deliver wholesale supplies, if any; and iv) regulatory approvals required to convey or deliver the wholesale supply.

Wholesale Supplies Received

JCSD is a member of the Chino Basin Desalter Authority (CDA), a Joint Exercise of Powers Agency, along with Santa Ana River Water Company, Inland Empire Utilities Agency (wholesaler), and the Cities of Chino, Chino Hills, Ontario, and Norco (UWMP, p. 6-2). CDA is a wholesale water supplier and its 2015 UWMP is provided in Appendix B. Each of the retail members of CDA have contractual "take or pay" commitments to purchase water produced by CDA (CDA, p. ES-2).

JCSD is currently entitled to 8,200 AFY of potable water from CDA. As of the most recent UWMP, JCSD received 8,616 AF from CDA and the District plans for supplies from CDA to stabilize at 11,333 AFY beginning in 2020 (UWMP, p. 6-33). Quantities of water received in prior years from CDA are provided in **Table 3-1**.

Table 3-1: Recorded CDA Wholesale Deliveries

	2010	2015	2016	2017	2018	2019
Volume (AF)	8,782	8,616	8,073	8,164	8,972	9,575

Note: From JCSD Staff, Water Supply History.
AF = acre-feet

The goals of CDA are:

- Achieve hydraulic control of the Chino Groundwater Basin (Chino Basin) to prevent contaminated Chino Basin groundwater from entering Santa Ana River;
- Remove contamination (primarily nitrates, as well as TCE, PCE, and TCP) from groundwater in the southern portion of the Chino Basin; and
- Deliver the treated water to member agencies to offset the need for imported water. (UWMP, p. 6-2)

CDA provides high-quality drinking water from two desalters (salt removers) that are anticipated to treat approximately 35,200 AFY of Chino Basin groundwater in 2020 and thereafter. The Chino I Desalter, located at 6905 Kimball Avenue in Chino, was completed in 2000 and expanded in August 2005 to its current rated capacity of 15,906 AFY (14.2 mgd). However, the Chino I Desalter cannot provide this rated capacity due to the high total dissolved solids in the raw water supply. The Chino II Desalter was completed in 2006 and is located at 11202 Harrel Street in the City of Jurupa Valley. The current rated capacity is 11,201 AFY (10 mgd) and permitted capacity is 16,802 AFY (15 mgd), including 5,600 AFY (5 mgd) raw water bypass. However, the Chino II Desalter has not achieved the permitted capacity as a result of insufficient raw water supply. CDA is currently expanding the Chino II Desalter to a rated capacity of 25,427 AFY (22.7 mgd). Although Chino Desalter I capacity will not be increased, additional raw water capacity will be provided by five new wells in the Chino Creek Well Field. All five wells have been drilled and equipped.

As stated in CDA's 2015 UWMP:

> Its primary authority is to desalinate brackish groundwater for its member agencies. The supply is 100 percent reliable under all water year types because pumping is in response to the OBMP [Optimum Basin Management Plan] to remove salts and nitrates from the basin and prevent highly saline groundwater from reaching the Santa Ana River. No

> water shortages are anticipated due to the mandate to continually pump 40,000 AFY from the basin. (CDA 2016, p. ES-2)

To date, JCSD has not received water supplies from a wholesale agency other than CDA; however potential partnerships are under consideration including, Inland Empire Utilities Agency (for recycled water) and an imported water supply source that may include local wholesale water supplier, Western Municipal Water District (WMWD).

Dry Year Yield Storage Program

The Dry Year Yield (DYY) storage program is a cooperative Conjunctive Use Program Agreement (No. 49960) between the Metropolitan Water District of Southern California (MWD), Inland Empire Utilities Agency (IEUA), Chino Basin Watermaster, Three Valleys Municipal Water District, and the Chino Basin groundwater producers (Appendix D). Under the DYY Program, MWD can store up to 100,000 AFY of imported water in the Chino Basin during wet years when surplus water is available, and to reduce imported water deliveries up to 33,000 AFY in dry, drought, or emergency periods, but not to exceed the amount of water in the MWD storage account. The DYY program provides MWD the right to store groundwater in the basin, in exchange for paying the costs of developing the facilities that deliver that water.

DYY funds were used by JCSD for the construction of the Roger D. Teagarden Ion-Exchange Facility. When MWD makes a call for its stored water, JCSD can operate this facility and utilize water from the CDA to meet the District's water supply obligation.

Through a Local Agency Agreement with the City of Ontario, JCSD can purchase Ontario's portion of CDA water during years when MWD is not making a call for the stored water (i.e. "wet" or "non-call" years) (Appendix E). Up to 2,000 AF over 12 months is anticipated. During dry or "call" years, JCSD will stop receiving Ontario's portion of CDA water and return to District well supply. (UWMP, p. 6-31)

Water deliveries received from the DYY Program from calendar year (CY) 2015 to 2019 are provided in **Table 3-2.**

Table 3-2: Recorded DYY Program Deliveries

	2015	2016	2017	2018	2019
Volume (AF)	1,677.2	2,030.8	2,001.9	1,805.3	0

Note: From JCSD Staff, Water Supply History.
AF = acre-feet

3.2. Documenting Water Supplies

Water within the JCSD service area is entirely from groundwater production. The majority of that comes from the Chino Basin, which is supplemented with groundwater produced from the Riverside-Arlington Basin (aka Riverside South Basin). Water is obtained by way of District-owned wells and agreements with neighboring agencies. JCSD does not directly rely on imported water, surface water, stormwater, or recycled water to supplement the water supply. However, these sources can, and are, being used by other agencies in the Chino Basin to recharge the basin supply. (UWMP, p. 6-1)

Wholesale water from CDA and DYY Program deliveries are described previously in Section 3.1. The following is a description of the supplies produced and projected supplies reasonably available to JCSD.

JCSD Wells in Chino Basin

The Chino Basin covers approximately 240 square miles and is one of the largest groundwater basins in Southern California. There is an estimated five million AF of water in storage, and an unused storage capacity of approximately one million AF (UWMP, p. 6-8). The Chino Basin has been adjudicated, and pumping activities are closely monitored by the court-appointed Chino Basin Watermaster. A copy of the

1978 Chino Basin Judgment is provided in Appendix F. This is discussed in detail in Section 4.0 – Groundwater Analysis.

JCSD currently operates 18 potable water wells in the Chino Basin that have a theoretical maximum production rate of 36,315 gallons per minute (gpm). However, JCSD does not operate its wells at maximum capacity, but rather they fluctuate on and off as demand changes (UWMP, p. 6-7). The ultimate well production capacity is estimated at 43,315 gpm (JCSD 2020). JCSD's current production right to this source is 18,014.3 AF, as recorded in the Watermaster's most recent annual report (2018/2019). During 2018, which is the most recently reported data to the state, JCSD produced 14,829.05 AF from its potable wells in the Chino Basin (JCSD 2020). JCSD has assumed in the UWMP that the future pumped volumes from its potable well field in the Chino Basin will peak at 14,000 AFY, beginning in 2030**.** This level of production aims to minimize a decline in the groundwater table in the vicinity of the well field.

Two new potable wells are expected to be operational within the next five years (Wells 29 and 30). They will each contribute an additional 2,500 AFY. With the additional two wells, the total maximum day groundwater production capacity will be approximately 54.8 MGD (38,000 GPM). (UWMP, p. 6-7)

JCSD operates five non-potable wells within the Chino Basin. In 2018, the District produced 304.151 AF from this supply source to serve local park landscape irrigation-only accounts, and future production is estimated at 310 AFY (UWMP, p. 6-33).

The District operates two ion-exchange plants to denitrify water from several wells. The first is the Roger D. Teagarden Ion Exchange Facility which removes nitrates from seven potable wells. The other plant is the Well 17/18 Ion Exchange Facility that removes nitrates from JCSD Well Nos. 17 and 18. (UWMP, p. 6-7)

JCSD Wells in Riverside South Basin

The Riverside South Basin is the Riverside County portion of the larger Riverside-Arlington Basin. This basin has been adjudicated by the 1969 Orange County

Judgment located in Appendix G, and basin pumping rights are further defined in the 1969 Western-San Bernardino Judgment located in Appendix H. JCSD operates two non-potable wells within the Riverside South Basin. Water from these wells is used to irrigate Oak Quarry Golf Club located at 7151 Sierra Avenue in Jurupa Valley. During CY 2018, JCSD pumped 515.677 AF from this source. JCSD expects future production from this source will be approximately 450 AFY. (UWMP, p. 6-8)

Rubidoux Community Services District

Since 2000, JCSD has purchased water extracted from the Riverside South Basin from Rubidoux Community Services District (RCSD). Through an agreement established in 2014, JCSD can pump potable water from RCSD's system into the District's 1,110 Pressure Zone through the Jewel Street Booster Station (Appendix I). As shown in **Table 3-3**, no supply was received by JCSD from this source in CY 2018 (JCSD Staff). JCSD expects future annual purchases of approximately 2,000 AF from RCSD. (UWMP, p. 6-2)

Table 3-3: Recorded Rubidoux Community Services District Deliveries

	2010	2015	2016	2017	2018
Volume (AF)	743.378	2,249.813	2,029.25	2,322.617	0

Note: From JCSD Staff, Water Supply History.
AF = acre-feet

The current water supplies reasonably available to JCSD are summarized in **Table 3-4**, including the mechanism by which the District can use the water (e.g. water supply entitlement, water right, or water service contract), pursuant to SB 610 guidance.

Table 3-4: Current Water Supplies

Supply Type	Supply Method	Water Quality	Form of Right	AFY
Groundwater	JCSD Wells [a]	Potable	Right	14,788
Wholesaler	CDA	Potable	Contract	11,733
Groundwater	RCSD	Potable	Contract	2,000
Groundwater	DYY Program	Potable	Contract	2,000
Groundwater	JCSD Wells [b]	Non-Potable	Right	450
			Total	**± 30,971**

Note: From District staff, Jan. 17, 2020.
(a) Within adjudicated area of Chino Basin, as of 2018.
(b) Within Riverside South Basin.
AFY = acre-feet per year

The water supply used by the District is only that which is required to meet actual demand. Additional supply can be obtained from each of the sources in Table 3-4 is permitted with payment of appropriate fees.

According to information reasonably available to JCSD during preparation of the 2015 UWMP, as well as the most recently reported data from 2018, **Table 3-5** provides the recorded and projected water supply sources for the District. This includes two sources that have not yet been used by JCSD: potable water from a yet-to-be-determined project with an imported water source such as WMWD, and recycled water from the WRCRWA Plant through a pending grant project with IEUA.

Table 3-5: Actual and Projected Water Supplies

Supply Type	Source	Water Quality	Ever Used?	Past (AF)					Current (AF)	Reasonably Available Future Volume (AF)				
				2011	2012	2013	2014	2015	2018	2020	2025	2030	2035	2040
Groundwater	JCSD Wells[a]	Potable	Yes	15,174	12,599	16,724	16,249	8,993	14829.050	10,000	12,000	14,000	14,000	14,000
Purchased	CDA[b]	Potable	Yes	8,088	8,032	8,642	8,690	8,616	8971.649	11,733	11,733	11,733	11,733	11,733
Purchased	WMWD[b]	Potable	**No**	0	0	0	0	0	0	5,000	7,500	10,000	10,000	10,000
Purchased	RCSD	Potable	Yes	808	702	774	1,062	2,250	0	2,000	2,000	2,000	2,000	2,000
Other	DYY Program	Potable	Yes	0	0	0	457	1,677	1805.262	2,000	2,000	2,000	2,000	2,000
Recycled Water	WRCRWA Plant	Non-Potable	**No**	0	0	0	0	0	0	500	500	500	500	500
Groundwater	JCSD Wells[c]	Non-Potable	Yes	509	532	511	484	464	515.677	450	450	450	450	450
Groundwater	JCSD Wells[a]	Non-Potable	Yes	324	330	295	343	266	304.151	310	310	310	310	310
			Total	**24,903**	**22,195**	**26,963**	**26,963**	**22,381**	**26,425.8**	**31,993**	**36,493**	**40,993**	**40,993**	**40,993**

Note: From JCSD 2015 UWMP, p. 6-33. Current (2018) data provided by District.
(a) Located within Chino Basin.
(b) Wholesale agency. No project has been determined; wholesaler supplier subject to change.
(c) Located within Riverside South Basin.
(d) Located outside of the adjudicated portion of the Chino Basin.
AF = acre-feet

As shown in Table 3-5, potable water from a wholesale source, such as WMWD, and recycled water from WRCRWA have not been used by JCSD. Pursuant to SB 610 guidance, availability must be demonstrated for supply sources that have never been used by the water supplier. This can be done by identifying other water suppliers or contract holders that receive and have rights, entitlements, or contracts to the same source.

Western Municipal Water District

JCSD is one of 14 local retail agencies within the WMWD service area, and as such, JCSD can receive water from WMWD. WMWD is a member agency of MWD with responsibility to provide wholesale imported water to the retail agencies within its service area (CDA 2016, p. ES-1). This includes imported water supplies from the State Water Project obtained through WMWD's membership with MWD. WMWD provides supplemental water and/or water resources management to the cities of Norco, Corona, and Riverside and the water agencies of JCSD, SARWC, Box Springs Mutual, Eagle Valley Mutual, Elsinore Valley, Lee Lake, and Rancho California, and unincorporated areas of El Sobrante, Eagle Valley, Temescal Creek, Woodcrest, Lake Mathews, and March Air Reserve Base (CDA 2016, p. 2-2).

WMWD noted in their 2015 UWMP that JCSD may purchase water from them in the future (WMWD, p. 3-6). Further, WMWD's demand projections in the 2015 UWMP include 5,000 AFY to JCSD starting in 2020, increasing to 7,500 in 2025, then 10,000 from 2030 to 2040, which is consistent with the District's projection in Table 3-5 (ibid, p. 4-7). Future water supply projects between JCSD and WMWD would directly connect imported supplies to JCSD; however no project has yet been determined (UWMP, p. 6-32). Because of the assurance from MWD to its member agencies, WMWD's accounting for potential future demand from JCSD in their UWMP, and WMWD's ability to meet the demands of its other member agencies, the availability of future supply from WMWD is demonstrated.

Western Riverside County Regional Wastewater Authority

WRCRWA is a Joint Powers Authority consisting of the cities of Norco, Corona, JCSD, Home Gardens Sanitary District, and WMWD. The WRCRWA treatment plant is a tertiary treatment facility with an ultimate capacity of 32 mgd (WMWD, p. 6-11). JCSD is entitled to the recycled water generated from the District's share of sewer flow into the treatment plant. In 2015, approximately 3,890 AF of wastewater from the JCSD service area was sent to the WRCRWA Plant for treatment (UWMP, p. 6-26). Currently, the effluent from the WRCRWA facility is discharged directly to the Santa Ana River immediately upstream of Prado Dam (IEUA, p. 6).

WRCRWA is in the final planning stages of providing recycled water to the City of Norco. To date (2015), seven miles of recycled water pipeline, a small reservoir, and a pump station have been installed. Norco is anticipated to take delivery of up to 895 AFY of recycled water. In addition, WMWD is in the process of acquiring a change in use permit that would allow the WRCRWA member agencies to use recycled water from the treatment plant. (WMWD, p. 6-12).

JCSD is in the process of developing a recycled water system that will deliver irrigation water to parks and playgrounds utilizing a portion of the recycled water that they are entitled to from the WRCRWA facility. To further conserve local water supplies, JCSD would like to deliver the remaining portion of its recycled water entitlement to IEUA for reuse and replenishment of the Chino Basin (IEUA, p. 1). Therefore, IEUA and JCSD have partnered on a grant application to the State Water Resources Control Board under Prop. 1 and the Clean Water State Revolving Fund (CWSRF) Loan program for a joint regional recycled water intertie project (CWSRF No. 8167-110). The availability of this water supply source is demonstrated through the District's right to its share of sewer flow, the successful distribution of recycled water to the City of Norco and ongoing efforts to distribute recycled water to other member agencies, and the District's ongoing efforts to create a distribution network.

3.3. Descriptions of All Water Supply Projects

JCSD has budgeted $18,850,000 for water source development in fiscal year (FY) 2019-2020, and a total of $79,750,000 from FY 20/21 to beyond 2023, as shown in **Table 3-6**.

Table 3-6: JCSD Capital Projects Budget for Water Source Development

Capital Projects	Total Proposed Project Cost	Planned 2019-2020	Planned 2020-2021	Planned 2021-2022	Planned 2022-2023	Beyond 2023
CDA Expansion [a]	$40,100,000	-	-	-	-	-
CDA Expansion Phase 3, Well 12 and Pipeline	$2,100,000	$2,000,000	-	-	-	-
IEUA Regional Recycled Water Program [b]	$36,000,000	$150,000	$550,000	$550,000	$550,000	$33,500,000
Fontana Water Company Interconnection	$800,000	$200,000	$600,000	-	-	-
Well 29 Equipping	$5,200,000	$2,400,000	$2,500,000	-	-	-
Well 19/ Well 30 Land Purchase	$5,250,000	$2,700,000	$2,500,000	-	-	-
Imported Water	$30,000,000	$500,000	$9,000,000	$10,000,000	$10,000,000	-
Van Buren Interconnect	$6,000,000	$5,900,000	-	-	-	-
Roger Teagarden Plant Expansion (IXP)	$5,000,000	-	$1,500,000	$3,500,000	-	-
Well 13 Treatment Plant Expansion (IXP)	$10,200,000	$5,000,000	$5,000,000	-	-	-
Total Water Source Development	**$140,650,000**	**$18,850,000**	**$21,650,000**	**$14,050,000**	**$10,550,000**	**$33,500,000**

Note: From JCSD 2019-20 Operating & Capital Improvement Budget, p. 194.
(a) Project offset with $19 million and grant funds for a net capital cost of $21 million.
(b) $55 million estimated cost. Grant-dependent and JCSD portion is $36 million.
CDA= Chino Basin Desalter Authority; IEUA = Inland Empire Utilities Agency; IXP = ion-exchange plant.

No agreements have been finalized for the Fontana Water Company Interconnection and Van Buren Interconnect projects, and no specific project has been developed for the Imported Water line item.

3.4 Documenting Normal Year Water Supply and Demand

JCSD has various sources of water supplies available to meet demands during, normal, single-dry, and multiple-dry years. In the 2010 and 2015 UWMPs, JCSD assumed 2004 as its Normal Year and 1977 as the Single Dry Year. The Multiple-Dry Year period was established at 2012-2015 for the recent UWMP.

JCSD expects 100 percent of its supply to be available in all year types because the District's supply source is groundwater, and in particular the Chino Basin has five million AF in storage. Therefore, production of water would be a function of cost and not a lack of supply. Because JCSD does not operate its wells at full capacity, it can be assumed that groundwater pumping could increase to meet demand if drought conditions persisted or worsened.

A normal water year is a year, or an average of years, that most closely represents the average water supply available to the agency. The normal year water supplies available to JCSD and the normal year water demand projections are compared in **Table 3-7**. The District has determined with the addition of an imported water source, it will have sufficient supply and groundwater pumping capacity to meet maximum day water demands through 2040 (UWMP, p. 7-5)

Table 3-7: Normal Year Water Supply and Demand (AFY)

	2020	2025	2030	2035	2040
Supply [a]	31,993	36,493	40,993	40,993	40,993
Demand	25,477	28,088	30,968	34,151	37,670
Difference	+6,516	+8,405	+10,025	+6,842	+3,323

Note: From JCSD 2015 UWMP, p. 7-5.
(a) Includes potable water from future imported water source and recycled water from WRCRWA.
AFY = acre feet per year

As shown previously in Table 3-5, the projected supply from an imported water source is 5,000 AFY in 2020, 7,500 AFY in 2025, and 10,000 AFY beginning in 2030. Also, the projected recycled water supply from WRCRWA is 500 AFY beginning in 2020. If both supply sources were subtracted from the total supply in Table 3-7, then a potential shortfall would not appear until sometime between 2025 and 2030.

3.5 Documenting Single Dry Year Water Supply and Demand

The single dry year is the year that represents the lowest water supply available to the District. JCSD established in the 2010 UWMP that this is best represented by the dry year in 1977 (UWMP, p. 7-3). As shown in **Table 3-8**, JCSD has assumed the same water supply and demand as the Normal Year scenario shown in Table 3-7.

Table 3-8: Single Dry Year Water Supply and Demand (AFY)

	2020	2025	2030	2035	2040
Supply [a]	31,993	36,493	40,993	40,993	40,993
Demand	25,477	28,088	30,968	34,151	37,670
Difference	+6,516	+8,405	+10,025	+6,842	+3,323

Note: From JCSD 2015 UWMP, p. 7-5.
(a) Includes potable water from WMWD and recycled water from WRCRWA.
AFY = acre feet per year

JCSD expects by 2020 that recycled water will meet some of the irrigation water demand, thus making available several hundred acre-feet of potable groundwater potentially.

JCSD has observed in recent years reductions in water demand due to significant water conservation efforts on behalf of customers. Current and future drought regulations could further decrease water demands and ensure that existing supplies meet future demands during single or multiple dry years. (UWMP, p. 7-3)

3.6 Documenting Multiple Dry Year Water Supply and Demand

The multiple dry year period is the range of years representing the lowest average water supply available to the District for a consecutive multiple year period (three years or more). This was established as 2012 to 2015 in the UWMP. Notably, JCSD had sufficient supplies to meet demands during the drought period from 2011-2017. Because the District's supply source is groundwater, and specifically the Chino Basin has five million AF of water in storage, the District's ability to provide water during drought conditions would result in increased pumping costs but not the ability to produce water.

The multiple dry year supply and demand comparisons are shown in **Table 3-9**. Demand is expected to gradually decrease in response to drought regulations and water conservation. During the first dry year, JCSD assumes no change in projected water demand. During the second, third, and fourth dry years, JCSD assumes a decrease in water use of 5, 10, and 20 percent, respectively (as measured from the first-year baseline). This demonstrates the expected time-lag between the first dry year until water conservation efforts start to show an impact in water use. A multiple dry year decrease in demand of 20 percent has been demonstrated by JCSD, which reduced water production by 23 percent from 2013 to 2015. (UWMP, p. 7-5)

Table 3-9: Multiple Dry Year Water Supply and Demand (AFY)

		2020	2025	2030	2035	2040
First Year	Supply	31,993	36,493	40,993	40,993	40,993
	Demand	25,477	28,088	30,968	34,151	37,670
	Difference	+6,516	+8,405	+10,025	+6,842	+3,323
Second Year	Supply	31,993	36,493	40,993	40,993	40,993
	Demand	24,203	26,684	29,240	32,443	35,787
	Difference	+7,790	+9,809	+11,573	+8,550	+5,206
Third Year	Supply	31,993	36,493	40,993	40,993	40,993
	Demand	22,929	25,279	27,871	30,736	33,903

		2020	2025	2030	2035	2040
	Difference	+9,064	+11,214	+13,122	+10,257	+7,090
Fourth Year	Supply	31,993	36,493	40,993	40,993	40,993
	Demand	20,382	22,470	24,771	27,321	30,136
	Difference	+11,611	+14,023	+16,222	+13,672	+10,857

Note: From JCSD 2015 UWMP, p. 7-6.
AFY = acre-feet per year

As shown in Tables 3-7, 3-8, and 3-9 above, JCSD expects to have adequate water supplies to meet future planned water demands during normal, single-dry, and multiple-dry years through the 20-year planning period.

As described in Section 2, the annual potable water demand for the proposed Homestead Industrial Project is estimated at 75 AFY, which is based on a land use type that was accounted for in the planning and water demand projections made in the 2015 UWMP. Based on the information provided in the 2015 UWMP and updated information provided by JCSD as part of this WSA, the District has sufficient water supplies to meet the water demands of the Project by purchasing water from CDA that is within their contractual rights and by using existing groundwater supplies and pumping capacities that are more than adequate to meet the additional water demand of the proposed Project during normal, single-dry, and multiple-dry water years, including agricultural and manufacturing (i.e. commercial/industrial) uses. With the ongoing water conservation efforts, JCSD will further ensure its ability to provide sufficient supply for the proposed Project. Section 4 will discuss the District's water rights in light of this water supply and capacity analysis.

SECTION 4 - GROUNDWATER ANALYSIS

SB 610 requires specific groundwater information to be included in the WSA if groundwater will be a source of water for the proposed project. As discussed in Section 3, groundwater is a source of supply for the proposed Homestead Industrial Project.

Law

Water Code Section 10910 (f):

If a water supply for a proposed project includes groundwater, the following additional information shall be included in the water supply assessment:

(1) A review of any information contained in the urban water management plan relevant to the identified water supply for the proposed project.

(2) A description of any groundwater basin or basins from which the proposed project will be supplied. For those basins for which a court or the board has adjudicated the rights to pump groundwater, a copy of the order or decree adopted by the court or the board and a description of the amount of groundwater the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), has the legal right to pump under the order or decree. For basins that have not been adjudicated, information as to whether the department has identified the basin or basins as over drafted or has projected that the basin will become over drafted if present management conditions continue, in the most current bulletin of the department that characterizes the condition of the groundwater basin, and a detailed description by the public water system or the city or county if either is required to comply with this part pursuant to subdivision (b), of the efforts being undertaken in the basin or basins to eliminate the long-term overdraft condition.

(3) A detailed description and analysis of the amount and location of groundwater pumped by the public water system, or the city or county if either is

required to comply with this part pursuant to subdivision (b), for the past five years from any groundwater basin from which the proposed project will be supplied. The description and analysis shall be based on information that is reasonably available, including, but not limited to, historic use records.

(4) A detailed description and analysis of the amount and location of groundwater that is projected to be pumped by the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), from any basin from which the proposed project will be supplied. The description and analysis shall be based on information that is reasonably available, including, but not limited to, historic use records.

(5) An analysis of the sufficiency of the groundwater from the basin or basins from which the proposed project will be supplied to meet the projected water demand associated with the proposed project. A water supply assessment shall not be required to include the information required by this paragraph if the public water system determines, as part of the review required by paragraph (1), that the sufficiency of groundwater necessary to meet the initial and projected water demand associated with the project was addressed in the description and analysis required by paragraph (4) of subdivision (b) of Section 10631.

4.1 Review of Urban Water Management Plan (CWC Section 10910 (f)(1))

The *2015 Urban Water Management Plan* (UWMP), prepared by Albert A. Webb Associates (WEBB) on behalf of the Jurupa Community Services District (JCSD or District) was adopted by the Board of Directors on June 27, 2016 (Appendix A). The UWMP includes information relevant to the identified water supply for the proposed Project and is incorporated herein. Relevant information includes: 1) current and projected water demands through year 2040; 2) a description of the Chino Groundwater Basin; 3) the reliability of the water supply, projected supply and demand comparisons, and water shortage contingency plans; and 4) water demand management efforts.

As part of this Assessment, JCSD determined that the water supply and water demand projections provided in the UWMP are still accurate; however updated CY 2018 customer demand and water supply data was provided for this WSA. Current (2019/2020) budget information for water supply development projects was also provided for this WSA.

4.2 Groundwater Basin Descriptions (CWC Section 10910 (f)(2))

As discussed in Section 3, the Chino Groundwater Basin (Chino Basin) is the direct source of groundwater for JCSD. The use of groundwater from the Riverside South Basin is limited to non-potable wells used for irrigation purposes. **Figure 4-1, Groundwater Basin Map** shows the JCSD service area in relation to underlying groundwater basins.

Chino Basin Description

The Chino Basin covers approximately 240 square miles in the upper Santa Ana River Watershed, and underlies parts of Los Angeles, San Bernardino, and Riverside Counties. The state Department of Water Resources (DWR) identifies the Chino Basin as No. 8-002.01, a sub-basin of the Upper Santa Ana Valley (Bulletin 118).[1] While still considered a single basin for hydrologic purposes, the Chino Basin is divided into five management zones based on similar hydrologic conditions, and shown in **Figure 4-2**, **Groundwater Management Zones**.

It is estimated the Chino Basin has approximately 5 million acre-feet (AF) of water in storage, and an estimated 1 million AF of additional unused storage capacity (UWMP, p. 6-8). Geographically speaking, JCSD's service area covers the southeast corner of the Chino Basin. DWR Bulletin 118 (updated 03/05/18) describes the Chino Basin as follows:

[1] DWR collects, summarizes, and evaluates groundwater data in the "Bulletin 118" series, which present the results of basin evaluations and defines the boundaries of California's 515 alluvial groundwater basins. An update was provided in 2016. In Bulletin 118, DWR identifies each basin and sub-basin with a number code.

> The Chino Basin is bound on the northwest by the San Jose fault, on the north by the Cucamonga fault and impermeable rocks of the San Gabriel Mountains, and on the east by the Rialto-Colton fault. The basin is bound on the southeast by the Jurupa Mountains, Pedley Hills, La Sierra Hills, and the approximate location of the Santa Ana River. The Chino fault and impermeable rocks of the Chino Hills and Puente Hills bound the southwest side of the basin. In some areas, the basin boundary coincides with the Chino Basin (1978) groundwater adjudication boundary.

The Chino Basin is an adjudicated basin and has been extensively studied by the Chino Basin Watermaster (Watermaster), with reports available at www.cbwm.org. The following is an excerpt that describes the basin geology from the Watermaster's management plan called the Optimum Basin Management Program (OBMP) (1999, p. 2-2):

> Chino Basin was formed when eroded sediments from the San Gabriel Mountains, the Chino Hills, Puente Hills, and the San Bernardino Mountains filled a structural depression. The bottom of the Basin – the effective base of the freshwater aquifer – consists of impermeable sedimentary and igneous rocks. The base of the aquifer is overlain by older alluvium of the Pleistocene period followed by younger alluvium of the Holocene period. The younger alluvium varies in thickness from over 100 feet near the mountains to a just few feet, south of Interstate 10 and generally covers most of the north half of the Basin in undisturbed areas. The younger alluvium is not saturated and thus does not yield water directly to wells. Water percolates readily in the younger alluvium and most of the large spreading basins are located in the younger alluvium. The older alluvium varies in thickness from about 200 feet thick near the southwestern end of the Basin to over 1,100 feet thick southwest of Fontana, and averages about 500 feet throughout the Basin.

Legal Right to Pump from the Chino Basin

Water rights to the Chino Basin were adjudicated by the Superior Court of the State of California for the County of San Bernardino in 1978 (a copy of the Judgment is provided in Appendix F). The Judgment created the Chino Basin Watermaster (Watermaster) which is comprised of three stakeholder committees (or "pools"): Overlying Agricultural Pool Committee (representing dairymen, farmers, and the State of California); Overlying Non-Agricultural Pool Committee (representing businesses and industries); and Appropriative Pool Committee (representing local cities, public water districts and private water companies). The Watermaster carries out the provisions of the Judgment including monitoring of the basin and files an annual report on pumping and replenishment.

JCSD is a member of the Appropriative Pool and therefore has adjudicated production rights to the basin. The Judgment established the total Appropriative Right for the Appropriative Pool at 78,763.82 AF. The District's portion of the Appropriative Right is 2,960.60 AF, which does not change from year to year (CBWM, E-1).

The court's original Judgment declared the safe yield of the Chino Basin at 140,000 AFY.[2] The Watermaster may determine that the operating safe yield (OSY) can be higher from year-to-year depending on factors including favorable precipitation and management efforts that maximize the beneficial use of the groundwater Basin.[3] In April 2017, the Court ordered that the safe yield be set at 135,000 AFY for the period of July 1, 2010 to June 30, 2020, with limitations on retroactive accounting. The Watermaster is currently performing technical analyses for the next safe yield

[2] Judgment (1978) defines Safe Yield as, "The long-term average annual quantity of groundwater (excluding replenishment or stored water but including return flow to the Basin from use of replenishment or stored water), which can be produced from the basin under cultural conditions of a particular year without causing an undesirable result."
[3] Judgment (1978) defines Operating Safe Yield (OSY) as, "The annual amount of groundwater which Watermaster shall determine, pursuant to criteria specified in Exhibit "I", can be produced from Chino Basin by the Appropriative Pool parties free of replenishment obligation under the physical solution herein."

redetermination, which is anticipated to take effect July 1, 2020. The Judgment does not limit a Party's groundwater production to its share of safe yield.

As of June 30, 2018, the Judgment allocated an OSY of 49,834 AFY to the Appropriative Pool. Because JCSD has rights to 3.759 percent of the OSY, the District's current share of the OSY is 1,873.26 AF (CBWM, p. E-1). This amount will change from year to year as directed by the Watermaster.

JCSD also gains water rights through agricultural land use conversions. Since 2000, JCSD has been credited two AF per acre per year of water rights for every acre converted to non-agricultural use within the JCSD service area (Peace 1 Agreement, 2000). As of fiscal year (FY) 2017/2018, total land use conversion rights claimed by JCSD is 14,788.2 AF (CBWM, N-17). Annual adjustments to this right may be made by the Watermaster as part of their "Reallocation of Agricultural Pool Safe Yield" calculations.

The Judgment allocates safe yield of the Chino Basin according to the three pools as described above (Appendix F, Paragraph 13). The members of each pool are then enjoined from producing water from the Basin in excess of such allocated amount "except pursuant to the provisions of the Physical Solution" (Appendix F, Paragraph 13(a)-(c)).

The Physical Solution of the Judgment is described in broad terms by Paragraphs 39 through 57 of the Judgment. Paragraph 45 provides Watermaster with the authority to levy and collect assessments for the purchase of water necessary to balance the production by any party in excess of that party's allocated share of safe yield of the Chino Basin. Paragraphs 49 and 50 then describe the sources of water which are authorized to function as sources of replenishment water and methods by which water can be replenished to the Chino Basin. Exhibit H, Paragraph 7, of the Judgment describes the way in which costs for replenishment water will spread among the members of the Appropriative Pool.

The afore-cited paragraphs of the Judgment evince a clear expectation that parties, including JCSD, would produce water in excess of their adjudicated production rights. The injunction in Paragraph 13 of the Judgment should thus be interpreted to mean that parties are enjoined from producing water in excess of their adjudicated rights except to the extent that they will pay a replenishment assessment.

The ability to produce water from the Chino Basin is accordingly not a matter of availability, as contemplated and sanctioned by the Judgment for the reasons discussed above, but rather a matter of cost. Water produced in excess of production rights will cost more than water produced within a party's production rights. Thus, the quantity and reliability of groundwater supplies under the Judgment for purposes of this Assessment is a matter of cost of the water produced from the Basin rather than limitations on production which may otherwise operate to reduce the sufficiency of the groundwater supply.

In addition to the Appropriative Pool water rights, the contract obligations in the Dry Year Yield (DYY) Program, purchases from RCSD and CDA as described in Section 3, the District has groundwater rights held in the Chino Basin as described below:

- **Annual Early Transfers.** The Watermaster can approve an "Early Transfer" of water to the Appropriative Pool equal to the quantity of water not produced by the Overlying Agricultural Pool that is remaining after all land use conversions are satisfied, pursuant to the Peace Agreement.[4] The Early Transfer Water is annually allocated among the Appropriative Pool members in accordance with their pro-rata share of the initial Safe Yield. For JCSD, this is 3.759 percent of the amount transferred and therefore changes from year to year. In FY

[4] In 2007, the parties to the Chino Basin Judgement approved the "Peace Agreement" which is a set of measures proposed by Chino Basin Watermaster to supplement the OBMP Implementation Plan. Focus for the measures were placed on achieving hydraulic control (reduction of groundwater discharge from the Chino North Management Zone to the Santa Ana River). To achieve hydraulic control, re-operation (controlled overdraft) of the groundwater basin is proposed. Strategically placed wells would be constructed in the basin and the groundwater would be pumped to the Desalter to improve the long-term reliability of the basin.

2017/2018, JCSD was allocated 1,233 AF as its share of the Early Transfer (CBWM, p. N-18).

- **Groundwater Storage Accounts.** JCSD has rights to store water in the Chino Basin. Currently, there is a total of 29,958.7 AF in storage as recorded by the Watermaster (**Table 4-1**). As such, this is enough water in the District's storage accounts to meet at least one year of total demands, should its other water supply sources be unavailable.

Table 4-1: JCSD Groundwater Rights Summary

Right	FY 2017/2018 (AFY)
Appropriative Right	2,960.60
Percent of OSY	3.759%
Carryover Beginning Balance	2,061.1
Assigned Share of OSY	1,873.3
Net Ag Pool Reallocation [b]	14,079.9
Annual Production Right Subtotal	**18,014.3**
Groundwater Storage Accounts [a]	22,290.1 (Excess Carry Over)
	5,307.9 (Local Supplemental)
	2,360.8 (Other Storage and Replenishment)
Storage Account Subtotal	**29,958.7**
Total	**47,973**

Note: From CBWM 2019.
(a) Ending balances for production year 2017-2018 (CBWM, pp. N-13, N-14, N-15).
(b) Based on calculation with JCSD's claimed land use conversions of 14,788.2 AF plus 3.759% of 32,800 AF early transfer plus 25.911% of the Ag Pool annual (over) production amount of (-7,491.7 AF).
OSY = operating safe yield, AFY = acre-feet per year.

4.3. Recorded Use of Groundwater (CWC Section 10910 (f)(3))

JCSD currently operates 18 potable water wells in the Chino Basin that have a theoretical maximum production rate of 36,315 gallons per minute (gpm), and ultimate capacity is estimated at 43,315 gpm (JCSD 2020). JCSD does not operate its wells at maximum capacity, but rather they fluctuate on and off as demand changes. JCSD also operates seven non-potable wells in the Chino and Riverside South basins. Recorded groundwater production of potable and non-potable JCSD wells are listed in **Table 4-2**.

Table 4-2: JCSD Recorded Groundwater Production

Year	Potable Well Production (AFY)	Non-Potable Well Production (AFY)
2000	16,695	51
2005	18,913	--
2010	13,688	591
2015	8,993	845
2016	10,716	712
2017	12,906	795
2018	14,829	750

Note:
2000,2005,2010 from DWR Public Water Systems Statistics (PWSS) reports.
2015 from UWMP, p. 6-4.
2016-2018 from JCSD Staff, Water Supply History.
Values are rounded to nearest whole number.

4.4. Projected Use of Groundwater (CWC Section 10910 (f)(4))

Projected groundwater use by JCSD is dependent upon the cost of extracting, treating, and transporting the water to customers. Groundwater from the Chino Basin will be utilized by JCSD either directly by pumping into its distribution system or by obtaining groundwater through the CDA, RCSD, and/or through the DYY program.

Table 4-3: JCSD Projected Use of Groundwater

Supply Type	Source	Water Quality	Projected Use (AFY)				
			2020	2025	2030	2035	2040
Groundwater	JCSD Wells[a]	Potable	10,000	12,000	14,000	14,000	14,000
Purchased	CDA[b]	Potable	11,733	11,733	11,733	11,733	11,733
Purchased	RCSD	Potable	2,000	2,000	2,000	2,000	2,000
Other	DYY Program	Potable	2,000	2,000	2,000	2,000	2,000
Potable Sub-Total			**25,733**	**27,733**	**29,733**	**29,733**	**29,733**
Groundwater	JCSD Wells[c]	Non-Potable	450	450	450	450	450
Groundwater	JCSD Wells[a]	Non-Potable	310	310	310	310	310
Non-Potable Sub-Total			**760**	**760**	**760**	**760**	**760**
Total			**26,493**	**28,493**	**30,493**	**30,493**	**30,493**

Notes: From UWMP, p. 6-33.

The amount of water that JCSD plans to produce from the Chino Basin as shown in Table 4-3 is well within their rights pursuant to the Chino Basin Judgment (Appendix F). Further, projections of groundwater obtained by JCSD from the other sources listed in Table 4-3 are also within the District's rights and agreements. Therefore, the projected supplies needed to meet future demands are met from the various sources discussed in this report.

4.5. Sufficiency of Groundwater Basin (CWC Section 10910 (f)(5))

JCSD's legal right to pump water in an amount necessary to meet all demands as sanctioned and protected by the Judgment as discussed above, is buttressed by several programs and projects directed at ensuring the sufficiency of groundwater supplies from the Basin, particularly during dry years. An adjudicated water right has perhaps the most substantial indicia of reliability of any water right that currently exists

in California. An adjudicated right is based upon long-term studies whose purpose it is to protect the long-term functionality of the water source. These rights are coordinated in an established and binding manner with all the other users of the Basin and are overseen by Watermaster which has the authority to mandate and proscribe activities whose purpose is to protect the water source and maximize its long-term beneficial use.

All Watermaster processes are governed by Rules and Regulations and receive active oversight from the Court which, as noted above, retains continuing jurisdiction over the administration of the Judgment. Consequently, the sufficiency of the groundwater is not only directed by rigorous Watermaster management processes but validated and ensured by continuing Court oversight.

The Optimum Basin Management Program (OBMP) for the Chino Basin has guided the Chino Basin Watermaster's activities since its adoption in 1998. Watermaster-led basin management activities to ensure the maximization of safe yield and OSY of the Chino Basin include objectives, projects, and programs identified in the Peace Agreement and the OBMP. Progress is reported in annual reports, biennial and triennial reports. The key programs include:

1) a comprehensive monitoring program;
2) a comprehensive recharge program;
3) development and implementation of a water supply plan for impaired areas of the Basin;
4) development and implementation of a comprehensive groundwater management plan for Management Zone 1;
5) development and implementation of a regional supplemental water program;
6) development and implementation of cooperative programs with the California Regional Water Quality Control Board – Santa Ana Region and other agencies to improve Basin management;
7) development and implementation of a salt management program;

8) development and implementation of a groundwater storage program; and
9) development and implementation of storage and recovery programs.

As stated, the referenced elements of the OBMP collectively comprise a comprehensive regimen directed to ensuring and maximizing the long-term beneficial use of water in the Chino Basin. In particular, and specific to the location of current and future groundwater production facilities upon which JCSD relies or will rely to provide water to meet water demands within its service area, OBMP Program Element No. 3, "Develop and Implement Water Supply Plan for the Impaired Areas of the Basin" and Program Element No. 5, "Develop and Implement Regional Supplemental Water Program", address the sufficiency of groundwater from the Basin. Fundamentally, the goal of Program Elements 3 and 5 is to develop a regional, long range, cost-effective, equitable, water supply plan for producers in the Chino Basin that incorporates sound basin management (OBMP, p. 4-16).

The "water demand planning assumptions" used to develop and evaluate water supply plans for Program Element Nos. 3 and 5 of the OBMP are reproduced below (OBMP, p. 4-17):

> **"Available Water Supply from the Impaired Area.** As urbanization of the agricultural areas of San Bernardino and Riverside counties in the southern half of the Basin occurs, the agricultural water demands will decrease, and urban water demands will increase significantly. Future development in these areas is expected to be a combination of urban uses (residential, commercial, and industrial). The cities of Chino, Chino Hills, and Ontario, and the JCSD are expected to experience significant new demand as these purveyors begin serving urban customers in the former agricultural area. For planning purposes, the agricultural area is assumed to be fully developed by the year 2020." (OBMP, p. 4-17)
>
> "Based on current [1999] estimates of overlying agricultural pool production, it is expected that at least 40,000 AFY of groundwater will need

to [be] produced in the southern part of the Basin to maintain the safe yield. It is anticipated that CDA will meet this requirement in FY 2019/2020." (OBMP, p. 4-17)

"Water Supply Plans. Based on the data presented in Section 2 [OBMP, 1999], the municipal and industrial demands are projected to increase 30 percent between 2000 and 2020. Several agencies will experience increases in demand exceeding 30 percent over the next 20 years, including the cities of Chino, Chino Hills, Norco, Ontario, Cucamonga Valley Water District, Fontana Water Company (FWC), JCSD, and the West Valley Water District. Forecasts from municipal and industrial entities indicate that water supply sources for the Chino Basin in 2020 will consist predominantly of Chino Basin wells through direct use or treatment and use, groundwater and treated surface water from other basins, and MWD supplies." (OBMP, p. 4-17)

"For the purpose of the OBMP, it was assumed that there is approximately 48,000 AFY of agricultural production in the southern part of the Chino Basin in the year 2000, and that this production will reduce to about 8,000 AFY in the year 2020.[5] This decline in agricultural production must be matched by new production in the southern part of the Basin or the safe yield in the Basin will be reduced." (OBMP, p. 4-18)

"Recommended Water Supply Plan for the OBMP. Considerable discussion of the alternative water supply plans occurred at the OBMP workshops in February through May of 1999. The discussions focused, in part, on the assumption and details of each alternative and cost. Based on technical, environmental, and cost considerations, the stakeholders

[5] As of FY 18/19, agricultural production in the Chino Basin totaled 15,652 AF, consisting of Los Angeles County (148.7 AF), Riverside County (2,259.3 AF), and San Bernardino County (13,243.6 AF) (CBWM, p. 1.1).

selected Alternative 4A for detailed review and refinement. Alternative 6A was developed based on Alternative 4A and 5C, includes an accelerated desalting schedule and has no future supplemental water deliveries to the southern part of the Basin. The Alternative 6A water supply plan consists of the following key elements." (OBMP, p. 4-19)

"Groundwater Production Pattern. Groundwater production for municipal use will be increased in the southern part of the Basin to: meet the emerging demand for municipal supplies in the Chino Basin, maintain safe yield, and to protect water quality in the Santa Ana River. All new southern Basin production will require desalting prior to use. The cities of Chino, Chino Hills, Ontario and Norco, and the JCSD will maximize their use of groundwater from the southern part of the Basin prior to using other supplies."[6] (OBMP, pp. 4-19 – 4-20)

"Imported Water. Imported water use will increase to meet emerging demands for municipal and industrial supplies in the Chino Basin area, Watermaster replenishment, and conjunctive use. Expanded use of imported water in the northern part of the Basin will have a lower priority than maintaining groundwater production in the southern part of the Basin." (OBMP, p. 4-20)

"Recycled Water. Recycled water use (direct use and recharge) will increase to meet emerging demands for non-potable water and artificial recharge. Under the current Basin Plan, all new recycled water use will require mitigation for TDS and nitrogen impacts. Recycled water use will be expanded as soon as practical. The two new desalters described above and the increase in storm water recharge will provide mitigation for the expanded use of recycled water." (OBMP, p. 4-20)

[6] Detailed discussion continues in this paragraph concerning the production capacity of the desalters and construction/expansion projects.

As indicated in the foregoing OBMP text, the JCSD service area overlies groundwater supplies in the southern part of the Chino Basin which must be pumped for purposes of meeting new demands, maintaining safe yield, and to protect water quality in the Santa Ana River. As agricultural production in the southern part of the Chino Basin declines, it will be necessary for these reasons to increase production for municipal uses. This is being achieved through the Chino I and Chino II Desalters, of which the JCSD has a contractual right to purchase 8,200 AFY pursuant to the original agreement, and 11,733 AFY as a result of subsequent amendments and expanded treatment facilities (Appendix C). Thus, not only was increased Chino Basin water production by JCSD foreseen in the OBMP but sanctioned and encouraged for purposes of achieving OBMP objectives.

The sufficiency of the groundwater supply that is available to JCSD is assured due to the abundance of groundwater in the central and southern portion of the Chino Basin, OBMP objectives that prioritize and assure production from the southern Chino Basin coupled with desalting and ion-exchange treatment facilities that enable the use of this abundant supply for municipal (potable) purposes. As indicated in the quoted text of the OBMP, southern basin production, where JCSD is partially located, is the linchpin of several critical OBMP objectives. Thus, the sufficiency of groundwater is heightened and prioritized by the necessity of continued pumping from the southern Chino Basin under the OBMP which is administered by the Watermaster and ultimately enforced by continuing Court jurisdiction over the Judgment.

The other referenced OBMP Program Elements are collectively directed to ensuring the sufficiency of Chino Basin groundwater supplies, particularly during dry years, and comprehensively address water quality and quantity, thus maximizing beneficial use over the long-term. Sufficiency of groundwater from the Chino Basin is further assured for the following reasons:

- Inland Empire Utilities Agency (IEUA) is a member agency of MWD, which provides imported water from the State Water Project for direct use by parties to

the Judgment in the Chino Basin and for Chino Basin recharge purposes (when supplies are available). IEUA has also reviewed the sufficiency of supplies for its service territory that includes the Chino Basin in connection with its 2015 UWMP (Appendix J).

- IEUA's UWMP is consistent with, and reiterative of, OBMP projects and programs (see Section 7.4 of Appendix J). IEUA anticipates increased limitations for imported water for direct and recharge use while noting reductions during dry years (due to increased reliance on groundwater from the Basin) and in the higher amount otherwise required in the absence of OBMP projects and programs. The UWMP also analyzes the sufficiency of water supplies for single and multiple year drought scenarios and concludes the region is expected to meet 100 percent of its dry year demand under every scenario. Key assumptions included:

    - Reliance on assurances provided by MWD in its 2015 UWMP (Appendix K) that it could meet 100 percent of projected supplemental full-service water supply demands through 2040;
    - Implementation of MWD's Chino Basin DYY Storage Program consistent with the contractual shift obligations of the participating agencies of up to 33,000 AF in a twelve-month period; and
    - Sustain per capita water use reductions of 10 percent by 2015 and 20 percent by 2020.

IEUA concluded in its 2015 UWMP that the projected available water supply will meet projected water demand due to diversified water supply and water conservation measures. Based on IEUA water supply projections, there are sufficient water supplies to meet normal year water demands and single dry year demands. However, in the multiple dry year scenario a local supply gap of 283 AF is projected for 2040. IEUA and retail agencies plan to close the supply gap through utilizing local supplemental water supply opportunities and securing additional imported water as needed to

accommodate for the variability in supply from the State Water Project (Appendix J, p. 3-16).

CWC section 10631(j) provides that urban water suppliers, that rely upon a wholesale agency for a source of water may rely upon water supply information provided by the wholesale agency in fulfilling UWMP informational requirements.

IEUA's independent analysis of contemporary regional water conditions in conjunction with MWD's most recent report, provide additional and reliable assurances concerning the sufficiency of imported water supplies that comprise a portion of overall Chino Basin supply sufficiency. As stated in the above-quoted OBMP text, however, "expanded use of imported water in the northern part of the Chino Basin will have a lower priority than maintaining groundwater production in the southern part of the Chino Basin."

JCSD's participation in the DYY Storage Program described in Section 3, along with future water storage and recovery projects will drought-proof the Chino Basin and all other appropriative pool members from imported water shortages. This program is consistent with OBMP Program Element No. 9, "Develop and Implement Storage and Recovery Program." Benefits to the Chino Basin associated with this program include the construction of facilities to enhance imported water deliveries and the production of water from the Chino Basin. Further demonstrating the sufficiency of Chino Basin groundwater is MWD's program to use the Chino Basin for dry year supply purposes, thus underscoring that sufficient Chino Basin groundwater is available during dry years not only for local use by agencies like JCSD but also in connection with MWD's regional reliability programs.

In conclusion, the sufficiency of groundwater supplies available to JCSD is assured because of the OBMP programs overseen by the Chino Basin Watermaster and conducted under the auspices of continuing Court jurisdiction that specifically direct and assure the long-term production of water pursuant to the District's legal rights to produce such water necessary to meet ultimate water demands.

Conclusion

As discussed in Section 2, the proposed Project's annual water demand is estimated at 75 AFY, for a land use type that was accounted for on the site in the 2015 UWMP. Recycled water may be used on the site in the future, but for the purposes of this analysis potable water is assumed. District-wide potable water consumption in CY 2018 was 24,489 AF (JCSD 2020). With passage of recent statewide water conservation standards, said consumption of potable water is anticipated to decline.

As discussed in Section 3, the water supply portfolio available to serve the Project includes local potable water from District wells, CDA, RCSD, and the DYY Program. The District also maintains water storage accounts through the Chino Basin Watermaster. As of 2018, the potable water supplies utilized by JCSD totaled approximately 25,606 AF, which is commensurate with the District-wide potable demand during the same time period (JCSD 2020).

As of CY 2018, the potable groundwater production by JCSD was approximately 14,829 AF, which is commensurate with the District's projected peak production (Table 4-2). Further, the District currently uses just a portion of the total rights to potable water available from the CDA (Table 4-3).

Currently, JCSD's annual production right in the Chino Basin as calculated by the Watermaster totals 18,014.3 AF, with an additional 29,959 AF in storage (Table 4-1). Although annual fluctuations to rights and storage accounts will occur, the District's rights are projected to increase over the next 20 years due to more land use conversions.

In conclusion, the water supplies available to JCSD currently meet and exceed water demands. Groundwater production by JCSD is currently less than their existing rights and within their groundwater well production capacity. Regardless, JCSD has the means and right to exceed their groundwater allocation in the Chino Basin when required to meet demand pursuant to the Judgment. Further, JCSD has rights to water

held in storage that would supply customer demands for more than one year. On the other hand, JCSD also can supply water to the Project purchased from CDA that is within their existing entitlements and capacities. Therefore, the District can meet the additional unplanned water demand of the proposed Project by producing additional groundwater to which it has existing rights to and available capacity to use.

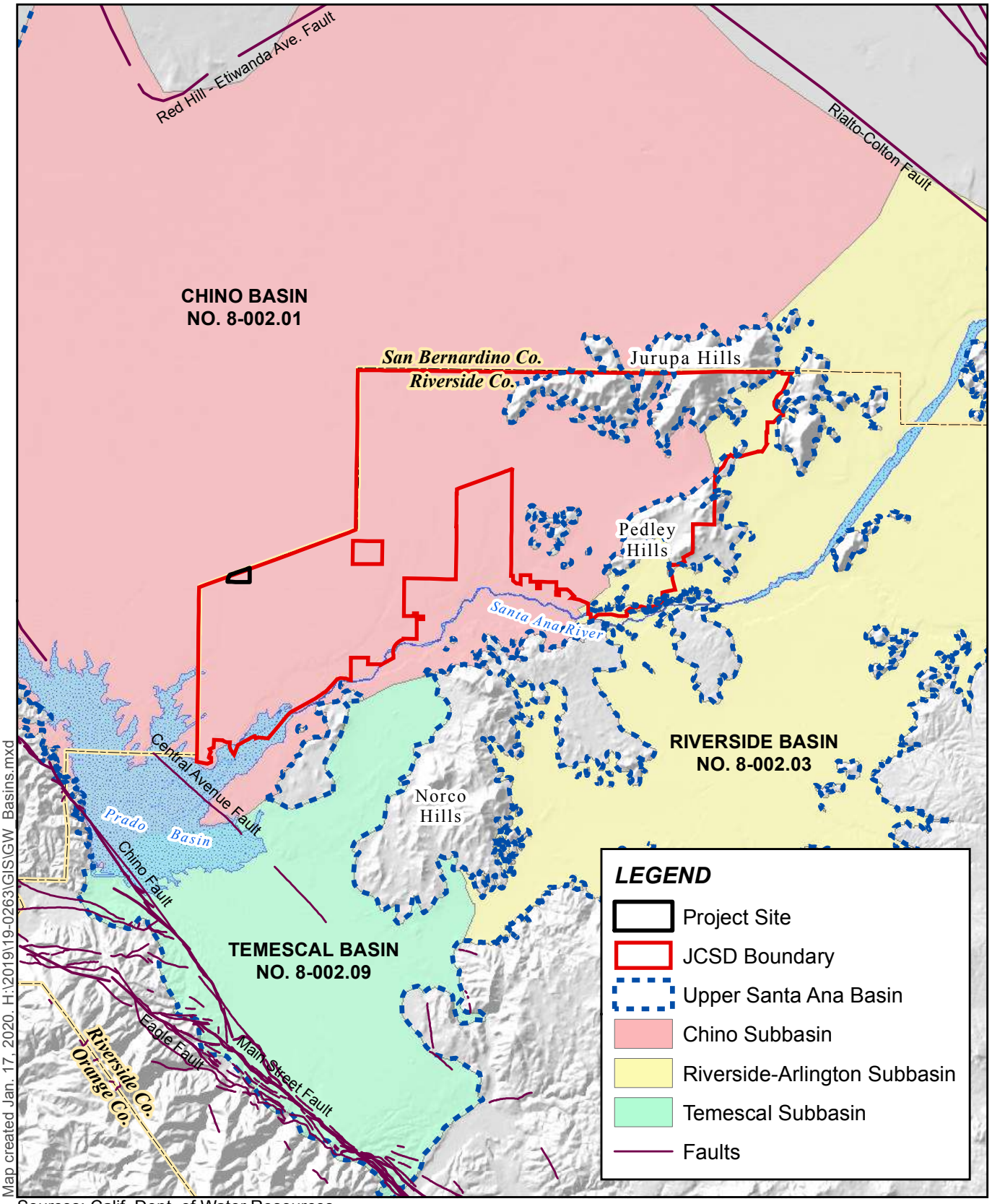

Figure 4-1 – Groundwater Basin Map

The Homestead WSA

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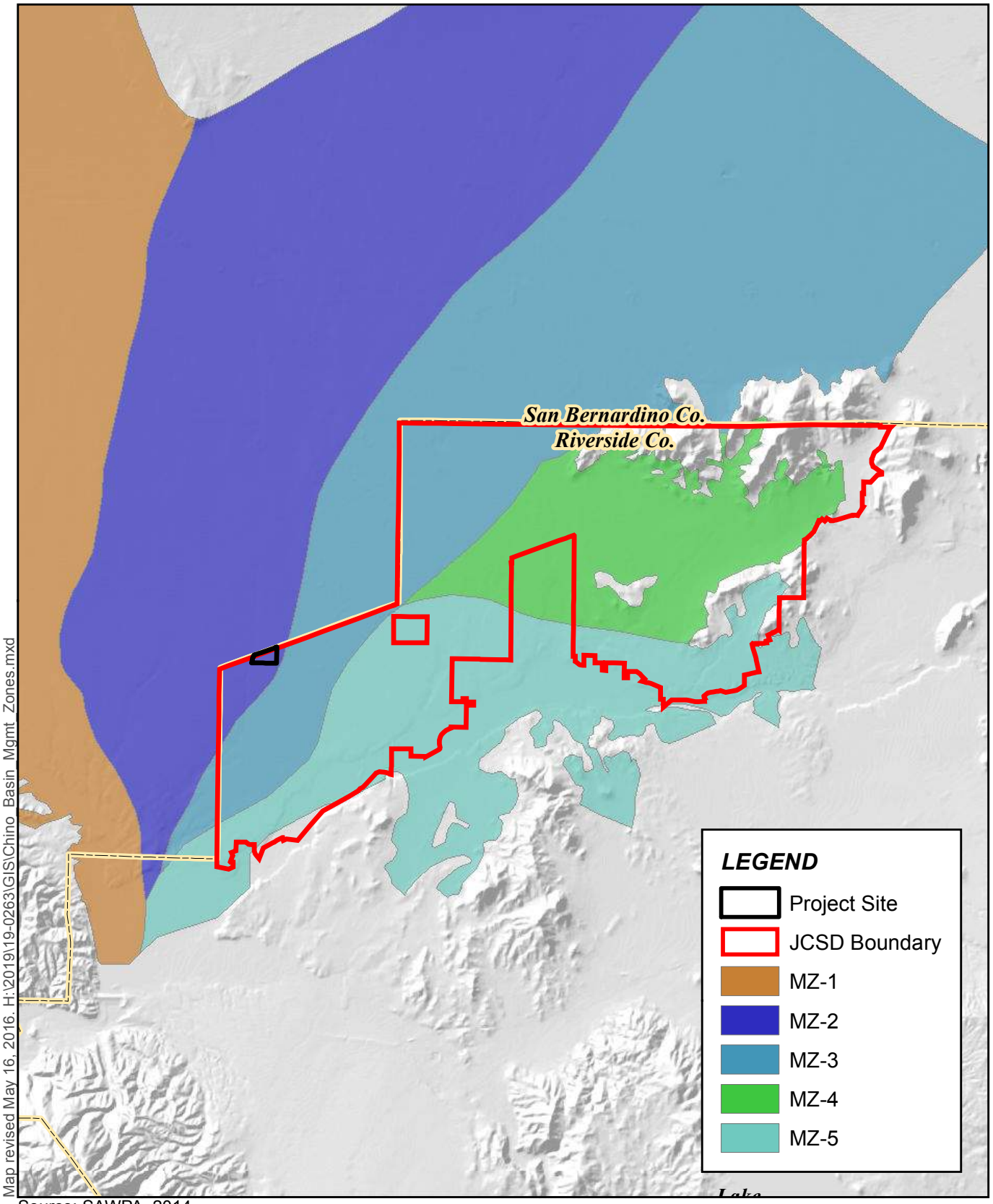

Source: SAWPA, 2014

Figure 4-2 – Chino Basin Management Zones

The Homestead WSA

0 2 4 Miles

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SECTION 5 - PRIMARY ISSUE FOR ASSESSMENT

The lead agency, "…shall determine, based on the entire record, whether projected water supplies will be sufficient to satisfy demands of the project, in addition to existing and planned future uses" (CWC section 10911). The lead agency is expected to approve or disapprove the project based on several factors, including but not limited to the Water Supply Assessment (WSA).

Law

Water Code Section 10910(g)(1):

Subject to paragraph (2), the governing body of each public water system shall submit the assessment to the city or county not later than 90 days from the date on which the request was received. The governing body of each public water system, or the city or county if either is required to comply with this act pursuant to subdivision (b), shall approve the assessment prepared pursuant to this section at a regular or special meeting.

Water Code Section 10911(b):

The city or county shall include the water assessment provided pursuant to Section 10910, and any information provided pursuant to subdivision 9a), in any environmental document prepared for the project pursuant to Division 13 (commencing with Section 21000) of the Public Resources Code.

(c) The city or county may include in any environmental document an evaluation of any information included in that environmental document provided pursuant to subdivision (b). The city or county shall determine, based on the entire record, whether projected water supplies will be sufficient to satisfy the demands of the project, in addition to existing and planned future uses. If the city or county determines that water supplies will not be sufficient, the city or county shall include that determination in its findings for the project.

The lead agency is expected to review the WSA and decide whether additional water supply information is needed for its consideration of the proposed project.

5.1 Findings

Whereas:

1. Jurupa Community Services District (JCSD) has been identified as the water supplier for the proposed Homestead Industrial project ("Project"). JCSD prepared an Urban Water Management Plan (UWMP) in 2015.
2. The Project is in the City of Eastvale and consists of a proposal to convert approximately 56 gross acres of dairy farm into 49.66 net acres of industrial park. According to the Eastvale General Plan, the existing and proposed land use designation of the Project site is Light Industrial.
3. The estimated potable water demand for the Project is 75 acre-feet per year (AFY) (Table 2-3). No recycled water is assumed available to serve this Project at this time.
4. The Project site was accounted for as a future industrial development in the 2015 UWMP. Because the proposed Project is consistent with this land use designation, the Project was accounted for in the water demand projections of the most recent UWMP.
5. JCSD produced 14,829 AF of groundwater for potable use in CY 2018. JCSD has water production rights in the Chino Groundwater Basin that currently total 18,014.3 AF, as well as groundwater storage accounts that total 29,959 AF (Table 4-1).
6. JCSD holds a contractual commitment as a member of the Chino Basin Desalter Authority (CDA) for potable supplies in the amount of 11,733 AFY, and an agreement to purchase potable water from Rubidoux Community Services District (RCSD) in the amount of approximately 2,000 AFY. During dry years, JCSD can also purchase the City of Ontario's share of CDA water in the amount of approximately 2,000 AF through the DYY Program. In CY 2018, JCSD received 8,972 AF from CDA and 1,805 AF through the DYY Program. No supply was received from RCSD in CY 2018 (Table 3-5).

7. JCSD has forecasted excess water supplies will be available to meet customer demand during single-dry and multiple dry water years over the next 20 years (Tables 3-8 and 3-9), assuming a new water supply source is brought online around 2030. Current projects and supply sources include Fontana Water Company Interconnection and Van Buren Interconnect projects, and a future imported water supply connection (Table 3-6). The District is currently partnering with IEUA to obtain grant funding for a recycled water interconnection.
8. Potable water demand in the JCSD service area was 24,489 AF as of CY 2018. By 2040, ultimate potable water demands are estimated at 36,289 AFY (Table 2-2). The current groundwater pumping capacity (36,315 gpm) will be increased ultimately to 43,315 gpm to meet customer demands under buildout conditions.
9. The proposed Project is a conversion from agricultural to non-agricultural land uses, and as a result, JCSD can claim additional water rights in the amount of 2 AF per acre converted per year. Assuming a conversion of 56 gross acres, this Project will add 112 AFY of groundwater rights to JCSD's supply portfolio. Because the potable water demand for the Project is 75 AFY, the Project will increase the District's net supply by up to 37 AFY.
10. Based on the evidence provided herein, the total projected water supplies available to JCSD during normal, single dry, and multiple dry water years over a 20-year projection will be sufficient to meet the projected water demand associated with the proposed Project in addition to the water supplier's existing and planned future uses, including agricultural and manufacturing uses. State mandated conservation efforts will reduce demand in the future.

SECTION 6 - REFERENCES

Carollo 2016	Carollo Engineers, Inc. *March 2016 Update to the Jurupa Community Services District 2015 Capacity Charges Study.*
CBWM	Chino Basin Watermaster, *Fiscal Year 2017-18, 41st Annual Report.* (Available at http://www.cbwm.org/rep_annual.htm, accessed Jan. 17, 2020).
CDA 2016	Chino Basin Desalter Authority, *2015 Urban Water Management Plan.* June 2016. (Appendix B)
CDA JCSD 2016	Chino Basin Desalter Authority. *Amended and Restated Water Purchase Agreement by and between Chino Basin Desalter Authority and The Jurupa Community Services District,* January 1, 2011. (Appendix C)
DWR 2003	California Department of Water Resources, *Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 of 2001 to assist water suppliers, cities, and counties in integrating water and land use planning.* October 8, 2003. (Available at https://water.ca.gov/LegacyFiles/pubs/use/sb_610_sb_221_guidebook/guidebook.pdf.)
DWR Bulletin 118	Department of Water Resources. *8-002.01 Upper Santa Ana Valley – Chino Bulletin 118 Basin Boundaries.* Dated March 5, 2018. (Available at https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/B118-Basin-Boundary-Descriptions-2016/B118-Basin-Boundary-Description-2016---8_002_01.pdf)
DYY	*Amendment No. 8 to Groundwater Storage Program Funding Agreement No. 49960 By and Among The Metropolitan Water District of Southern California and Inland Empire Utilities Agency and Chino Basin Watermaster.* September 17, 2014. (Appendix D)
EMC	Eastvale Municipal Code (Available at https://library.municode.com/ca/eastvale/codes/code_of_ordinances.)
Executive Order B-37-16	State of California Executive Department, *Executive Order B-37-16 Making Water Conservation a California Way of Life*, May 9, 2016. (Available at https://www.gov.ca.gov/wp-content/uploads/2017/09/5.9.16_Attested_Drought_Order.pdf.)
Executive Order B-40-17	State of California Executive Department, Executive Order B-40-17, April 7, 2017. (Available at https://www.gov.ca.gov/docs/4.7.17_Exec_Order_B-40-17.pdf.)
GP 2012	City of Eastvale General Plan Adopted. June 13, 2012. (Available at https://www.eastvaleca.gov/home/showdocument?id=2360)
HPA Architecture	*Master Site Plan for The Homestead, Orbis Real Estate Partners, Sheet DAB-A1.0*. Dated December 17, 2019.
IEUA	Inland Empire Utilities Agency. *State Water Resources Control Board Proposition 1 Grant and SRF Loan Application for Joint IEUA-JCSD Recycled Water Intertie Project (CWSRF Project No. 8167-110).* (Available at https://www.ieua.org/download/wrcrwa-project-grant-application-ieua-jcsd/.)
JCSD 2020	Albert A. Webb Associates, *Memorandum to Jurupa Community Services District for Information for Water Supply Assessment*, January 14, 2020.

JCSD Draft Master Water Plan	Albert A. Webb Associates. *Summary Master Water Plan (draft) prepared for Jurupa Community Services District*. October, 2005.
JCSD RCSD	*Inter-Agency Operating Agreement for Use of the JCSD-RCSD Jewel Street Booster Station and Pipeline Interconnection,* 2015. (Appendix I)
JCSD Staff, Water Supply History	Jurupa Community Services District Staff, *Water Supply History data from 05-06 thru 17-18.* Provided to Albert A. Webb Associates, Jan. 15, 2020.
JCSD Web site	Jurupa Community Services District Web site, *Water Conservation and Regulations*. Accessed 12/17/19 at https://www.jcsd.us/services/conservation-and-efficiency-programs
Judgment	Judgment, *Chino Basin Municipal Water District v. City of Chino, et al.,* San Bernardino Ct. No. 164327 (filed Jan. 30, 1978). Includes amendments thereto. (Appendix F)
Local Agency Agreement	Agreement by and between the City of Ontario and Jurupa Community Services District establishing an operational plan for Metropolitan Water District/Chino Basin Groundwater Storage Program, Providing for Water Supply to Ontario's New Model Colony and Interconnection to Increase Water Supply Reliability. November 21, 2014. (Appendix E).
Making Water Conservation a California Way of Life	California Department of Water Resources, et. al., *Making Water Conservation a California Way of Life, Implementing Executive Order B-37-16 Final Report,* April 2017. (Available at http://www.water.ca.gov/wateruseefficiency/conservation/docs/20170407_EO_B-37-16_Final_Report.pdf)
MWD	The Metropolitan Water District of Southern California, *2015 Urban Water Management Plan*. June 2016.
OBMP	Wildermuth Environmental, *Optimum Basin Management Program Phase I report prepared for Chino Basin Watermaster*. August 19, 1999. (Available at http://cbwm.org/docs/engdocs/OBMP%20-%20Phase%20I%20(Revised%20DigDoc).pdf)
Orange County Judgment	Judgment, *Orange County Water District v. City of Chino, et al.,* Superior Court for the State of California for the County of Orange No. 117628 (filed April 17, 1969). (Appendix G)
Rincon	Rincon Consultants, *Project Description, Administrative Draft Environmental Impact Report for Homestead Industrial Project, City of Eastvale.* December 2019.
UWMP	Albert A. Webb Associates, *Jurupa Community Services District 2015 Urban Water Management Plan Final*, June 27, 2016. (Appendix A)
Webb 2019	Albert A. Webb Associates. *Jurupa Community Services District Water & Sewer Availability for The Homestead, APN 144-010-015, 144-010-018, 144-010-020, 144-010-023, 144-010-024, and 144-010-032, located northwest and southwest of the intersection of Archibald Avenue and Limonite Avenue.* October 23, 2019.
Western-San Bernardino Judgment	Judgment, *Western Municipal Water District, et al. v. East San Bernardino County Water District, et al.,* Superior Court of the State of California in and for the County of Riverside No. 784726 (filed April 17, 1969). (Appendix H)
WMWD	RMC Water and Environment. *Western Municipal Water District 2015 Urban Water Management Plan Update, Final Report*. June 2016.

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