

FINAL ENVIRONMENTAL IMPACT REPORT NO. 168  
ZONE CHANGE NO. 3475  
AND  
SPECIFIC PLAN NO. 174  
"THE SPRINGS"

EDGEMONT-SUNNYMEAD

JUNE 1982

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PREPARED BY:  
RIVERSIDE COUNTY PLANNING DEPARTMENT

FINAL ENVIRONMENTAL IMPACT REPORT NO. 168  
ZONE CHANGE NO. 3475 AND SPECIFIC PLAN NO. 174  
"THE SPRINGS"

Planning Department Certification

I certify that this final environmental impact report is an accurate, objective and adequate statement which contains the documentation required by Section 607 of the Local Rules to Implement CEQA and has otherwise complied with CEQA.

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*Patricia Nemeth*  
Patricia Nemeth, AICP, Planning Director

FINAL ENVIRONMENTAL IMPACT REPORT NO. 168  
ZONE CHANGE NO. 3475 AND SPECIFIC PLAN NO. 174

The final Environmental Impact Report (EIR) consists of two volumes. The first volume is the Draft EIR which is dated March 1982 and was circulated for review and comment. The second volume, which you are reading, contains the following:

1. A list of public agencies and other parties commenting on the Draft EIR.
2. Significant comments of public agencies and other parties and the Planning Department's responses to them.
3. A summary of impacts found to be significant and requiring mitigation measures or overriding findings.

#### I. COMMENTING AGENCIES

The following agencies and parties commented, all in writing, on the Draft EIR:

- A. California Department of Health Services, Office of Noise Control
- B. California Office of Planning and Research, State Clearinghouse
- C. California Regional Water Quality Control Board, Santa Ana Region
- D. California Department of Transportation, District 8
- E. California Department of Water Resources
- F. Eastern Municipal Water District
- G. Edgemont Community Services District
- H. Metropolitan Water District of Southern California
- I. Pacific Telephone Company
- J. Riverside, Office of the City Manager
- K. Riverside County Aviation Department
- L. Riverside County Department of Building and Safety
- M. Riverside County Department of Environmental Health
- N. Riverside County Fire Department
- O. Riverside County Flood Control and Water Conservation District
- P. Riverside County Parks Department
- Q. Riverside County Road Department
- R. Riverside County Sheriff's Department
- S. Riverside International Raceway
- T. Southern California Gas Company

#### II. RESPONSE TO COMMENTS

Responses to comments were prepared by both Planning Department staff and the consultant firms that prepared the draft EIR and traffic studies. Some of the comments presented in this section have been summarized. However, all letters of comment, unabridged, are provided for reference at the end of this document.

A. CALIFORNIA DEPARTMENT OF HEALTH SERVICES, OFFICE OF NOISE CONTROL

Comment:

We agree that given the noise levels from March Air Force Base, commercial/industrial development is a reasonable use for the land.

Response:

The comment is noted.

Comment:

One issue which seems not to be addressed in sufficient detail is the potential impact of the 105-acre industrial area in the southeastern corner of the site. Truck traffic to and from this area may impact upon the residences and the school on Eucalyptus and, perhaps, residential areas along Day south of Eucalyptus. Although the type of industry is restricted (page 27), it is not clear whether the percentage ("present" sic) of trucks shown in Table 4 (page 81) includes the industrial truck traffic. For example, Table 14 (page 115) shows the total number of trips generated by the various planning areas, but it does not show the percentage of truck traffic by area. Thus, one is unsure of how the percentage of truck traffic shown in Table 4 was derived.

Response:

The percentage of trucks as a part of total traffic generated by the project was determined for the entire project and was not broken down by land use type or planning unit. The assumption was made that the types of industry permitted in the light industrial area would not generate substantially different ratios of truck/car traffic than would the project as a whole.

Since both Day Street and Eucalyptus Avenue provide direct access from the project site to Highway 60 and I-15E, respectively, both auto and truck traffic would be oriented away from most neighboring residential areas. There are no residences along Day Street northerly of Eucalyptus Avenue. Since the main entrance to the site from Eucalyptus is westerly of the school and residential area along that street, most traffic using the I-15E/Eucalyptus route to the site will not pass in front of the school and residences. In fact, less than 4% of the total traffic using the site will pass in front of them.

However, even the relatively small amount of trucks passing in front of the school and residences along Eucalyptus would represent a significant nonmitigable impact on those land uses.

B. CALIFORNIA OFFICE OF PLANNING AND RESEARCH, STATE CLEARINGHOUSE

Comment:

When preparing the final EIR, you must include all comments and responses (CEQA Guidelines, Section 15146). The certified EIR must be considered in the decision-making process for the project. In addition, we urge you to respond directly to the agencies' comments by writing to them, including the State Clearinghouse number on all correspondence.

A recent Appellate Court decision in Cleary vs. County of Stanislaus clarified requirements for responding to review comments. Specifically, the court indicated that comments must be addressed in detail, giving reasons why the specific comments and suggestions were not accepted and factors of overriding importance warrant an override of the suggestion. Responses to comments must not be conclusory statements but must be supported by empirical or experimental data, scientific authority or explanatory information. The court further said that the responses must be a good faith, reasoned analysis.

Section 15002 (f) of the CEQA Guidelines requires that a governmental agency take certain actions if an EIR shows substantial adverse environmental impacts could result from a project. These actions include changing the project, imposing conditions on the project, adopting plans or ordinances to avoid the problem, selecting an alternative to the project, or disapproving the project. In the event that the project is approved without adequate mitigation of significant effects, the lead agency must make written findings for each significant effect (Section 15088) and it must support its actions with a written statement of overriding considerations for each unmitigated significant effect (Section 15089).

If the project requires discretionary approval from any state agency, the Notice of Determination must be filed with the Secretary for Resources, as well as with the County Clerk.

Response:

The comment notes general requirements regarding the preparation and use of the final EIR. The County intends to comply with the requirements.

C. CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, SANTA ANA REGION

Comment:

We generally agree with the findings of the EIR. We are concerned, however, that even at design capacity, the proposed expanded Edgemont Community Services District treatment plant would not be sufficient to handle the projected volume (800,000 gallons per day) from the development. If the projected volume figures are correct, then how is the volume of wastes proposed to be handled? If a new treatment plant is constructed, waste discharge requirements from this Board will be necessary.

Response:

Even with the currently planned expansion of the Edgemont Community Services District (Edgemont CSD) sewage treatment plant, additional plant capacity would be needed to handle "The Springs" project at buildout. The currently planned expansion would be undertaken to provide adequate sewage treatment capacity for the Edgemont CSD through approximately the year 2000. Seven hundred thousand gallons per day of capacity is planned. "The Springs" project, alone, would generate 800,000 gallons of sewage per day. Further expansion of the treatment plant would occur in an economically sized unit that would handle about the same amount of sewage that the builtout "Springs" project would generate. Albert A. Webb Associates, representative for the Edgemont CSD, has indicated that the treatment plant site is large enough to accommodate the additional treatment plant unit. However, it is noted that the plant must meet Waste Discharge Requirements as set by the Regional Water Quality Control Board.

Edgemont CSD's current expansion proposal is at an advanced stage of permit-processing and the treatment plant may be constructed soon. The proposed "Springs" project is expected to be built in three phases from 1986 to 1992. Albert A. Webb Associates has indicated that the developer would purchase temporary capacity in the currently planned treatment plant to accommodate the early stages of the project until such time that the volume of sewage generated becomes great enough to justify construction of a second treatment unit. The developer would be responsible for financing the second treatment plant unit.

D. CALIFORNIA DEPARTMENT OF TRANSPORTATION, DISTRICT VIII

Comment:

It seems that the Draft Environmental Impact Report (DEIR) for this project (dated March 1982) was prepared well in advance of the required time allowed for review of the Notice of Preparation (NOP). We received the NOP for this project on February 18, 1982. Under the California Environmental Quality Act (CEQA), 45 days from the date of receipt are prescribed for review of an NOP. Had this procedure been followed, the review period would have ended no earlier than April 4, 1982; therefore, the DEIR does not include our comments or the document preparers' responses to them as it should.

Response:

The draft EIR was originally prepared to analyze a proposed zone change on the site from various residential zones to C-P-S (Scenic Highway Commercial) and I-P (Industrial Park). The Notice of Preparation (N.O.P.) for the zone change EIR was issued in July 1981. Later, the project proponent revised his application by moderately increasing the area of the site proposed for C-P-S zoning and by applying for a specific plan covering the area proposed for C-P-S. The draft EIR had been in preparation

since issuance of the N.O.P. Additional documentation was incorporated into the draft EIR to support the specific plan. Rather than transmit the draft EIR to other agencies at that point, a second Notice of Preparation was issued to make agencies aware of the changes in the project and to give them an opportunity to suggest additional input to the draft EIR. The second N.O.P. stated that a screencheck EIR had already been prepared, that the intent was to transmit it soon, and that if an agency desired to make additional comments, responses to the N.O.P. by telephone were encouraged. Every effort was made to incorporate responses that the County received soon after issuance of the N.O.P. into the draft EIR prior to its transmittal.

Comment:

In our comments on the NOP, we indicated that mitigation measures for the impacts to the transportation system should also consider the use of carpooling/vanpooling, the reservation of areas for park and ride facilities, and accommodations for both pedestrians and bicycles. These possibilities were not examined in the report. It would also be appropriate to consider the use of "flex-time" for the industrial development proposed.

Response:

The foregoing mitigation measures are appropriate for the project and are hereby incorporated into the final EIR. They will be considered for inclusion into the project.

Comment:

Costs related to any transportation improvements, potential for funding, and sources of funds should also be discussed.

Response:

As many as fourteen traffic lights would be needed at a cost of \$75,000 to 100,000 per signal. The additional cost of building a full interchange at I-15E and Eucalyptus Avenue instead of only a grade separation crossing would be about \$2,000,000. Other off-site improvements would be needed to widen and improve existing roads, such as Eucalyptus Ave. and Day Street. An extensive on-site roadway network would be needed. The costs for improving the roadways noted cannot be determined until detailed engineering plans have been made. These plans would be developed as part of project implementation.

Three sources of funding are available for the needed transportation improvements: 1915 Act Special Assessment District funding, state-federal matching funding, and developer contribution of funding. Basically, the developer would be responsible either directly or indirectly for all on-site improvements, all project perimeter improvements, and all off-site improvements for which the project is creating the immediate, and in some cases, ultimate need. The developer contributions may involve a combination of

direct funding and the creation of an assessment district through which the developer, or his successors in interest in the project, would provide additional funds. State and federal funds to improve I-15E to freeway status in the vicinity of the project may not be available until 1988 or 1989.

Comment:

On page 112 (last paragraph), the report indicates that an interchange has been proposed at either Alessandro Boulevard or Eucalyptus Avenue. While an interchange is proposed at Alessandro Boulevard, it has not been determined whether an interchange or an overpass will be constructed at Eucalyptus Avenue. In this regard, the last paragraph on page 124 should indicate that CALTRANS has not yet determined whether to construct an interchange or overcrossing at Interstate 15-E (State Route 194) and Eucalyptus Avenue.

References to CALTRANS District 07 (page 114) should be corrected to CALTRANS District 08. Also on the same page, the second paragraph should state that an environmental document will be submitted in June of 1983 - rather than a public hearing - and final environmental approval will be in July of 1983.

Response:

The corrections noted above are hereby incorporated into the final EIR.

Comment:

The report should include a traffic capacity analysis in order to evaluate the impacts of project-generated traffic on affected state facilities, especially at the following locations:

- Alessandro Boulevard intersection on I-15E
- Eucalyptus Avenue intersection on I-15E
  - (a) before the freeway is built  
(assuming a stoplight is installed)
  - (b) after the freeway is built  
(assuming a diamond interchange is built)
- Day Street Interchange on Route 60
- Section of I-15E between east and west junctions of I-15E and Route 60.

Response:

The traffic consultant firm, Greiner Engineering Sciences, Incorporated, has prepared a capacity analysis for the intersections and road segments listed above. Also, a capacity analysis was prepared for other intersections where capacities could potentially be exceeded. A weaving analysis was prepared for road segments where lane-changing movements are expected to be significant. Roadway system improvements that are needed to bring impacted intersections or roadway segments up to at least a level of service "D" (at capacity) by 2000, according to the consultant, are presented below.

1. I-15E at Alessandro Boulevard:

A grade-separated interchange at this location has already been proposed by CALTRANS. Based on project traffic assignments and assumed geometry at the ramp terminals, no further improvements should be necessary to accommodate Year 2000 project-related and through-traffic.

2. Eucalyptus Avenue at I-15E:

Capacity analyses show that an intersection would be inadequate to handle projected traffic volumes. Therefore, the following major improvements are recommended:

- a. Construct a four-lane Eucalyptus Avenue at I-15E.
- b. Construct a grade separation and "Urban Interchange" with dual left-turning lanes serving movements southbound to eastbound and westbound to southbound, and single turning lanes for the remaining movements.
- c. Signalize all ramp terminals.

3. Day Street at S.R. 60

- a. Add a separate left-turning lane for southbound to eastbound traffic.
- b. Channelize the right turn for northbound to eastbound traffic.
- c. Construct an additional southbound lane on Day Street, beginning at the eastbound to southbound off-ramp.
- d. Signalize all ramp terminals and allow free flow right turns.
- e. Construct a four-lane Day Street south of the interchange.

4. Day Street and Northernmost Access Drive:

- a. Construct four-lane Access Drive with outbound dual left-turning lane and separate right turning lane.

- b. Construct a four-laned Day Street with a separate southbound right-turning lane and a northbound left-turning lane.
  - c. Signalization.
5. Day Street and Middle Access Drive:
- a. Construct four-lane Access Drive and outbound dual left-turning lane and separate right-turning lane.
  - b. Construct a four-lane Day Street with a separate southbound right-turning lane and a northbound left-turning lane.
  - c. Signalization.
6. Day Street at Southernmost Access Drive
- a. Construct four-lane Access Drive with outbound dual left-turning lanes and separate right-turning lane.
  - b. Construct a four-lane Day Street north of the Access Drive and a two-lane Day Street with a northbound left-turning lane south of the Access Drive.
  - c. Signalization.
7. Day Street at Eucalyptus Avenue
- No improvements should be necessary to accommodate projected Year 2000 development and through traffic.
8. Day Street at Cottonwood Avenue
- Signalization.
9. Day Street at Alessandro Boulevard
- Signalization.
10. Eucalyptus Avenue at Site Access Drive ("C" Street)
- a. Construct a four-lane Eucalyptus Avenue at "C" Street with dual eastbound left-turning lanes.
  - b. Construct southbound triple right-turning lanes on "C" Street and separate left-turning lane with a 150-foot inside radius.
  - c. Signalization.

Weaving analyses were done in four locations using composite Year 2000 traffic. These locations and the results of the analyses are given below:

- 1) S.R. 60 westbound between I-15E and Day Street (LOS "D").
- 2) S.R. 60 eastbound between I-15E and Day Street (LOS "A").
- 3) I-15E southbound between S.R. 60 and Eucalyptus Avenue (LOS "C").
- 4) I-15E northbound between S.R. 60 and Eucalyptus Avenue (LOS "D").

Comment:

The report does not specify how far Node 20 (main feeder into the development from Eucalyptus) will be from the proposed interchange in order to avoid conflicts with the freeway ramps. Care must be taken as more specific plans are considered.

Response:

Node 20 (the "C" Street/Eucalyptus Avenue intersection) was originally proposed to be placed approximately 350' east of the I-15E right-of-way. Based on a capacity analysis prepared by the traffic consultant, this intersection would operate at an unsatisfactory level of service "F". An alternative location, about 700' east of the I-15E right-of-way, has been analyzed by the consultant with the determination that it could operate at an acceptable level of service "C". This alternative would place the main entrance to the shopping center where houses now exist along Eucalyptus Avenue.

Comment:

Signalization will be required at Day Street and Route 60 and Eucalyptus Avenue and I-15E on both ramps. It should be noted that the Day Street/Route 60 Interchange may require redesigning in order to accommodate projected peak demand.

Response:

The comment regarding signalization at the ramps associated with the two freeway interchanges is supported by the capacity analysis prepared by the consultant. Please see the response to a previous comment from CALTRANS. Also, please see the referenced comment for a list of improvements needed at the interchange at Day Street and Highway 60.

Comment:

An encroachment permit must be obtained for any work within the state highway right-of-way. CALTRANS, as a responsible agency, may require certain mitigation measures as a condition for permit issuance. We urge early and contiguous liaison with CALTRANS on proposed plans as they affect state highways.

We would like a copy of the final document as soon as it is available.

Response:

The comment is noted. Upon project approval, a copy of the final EIR and specific plan would be transmitted to CALTRANS.

E. CALIFORNIA DEPARTMENT OF WATER RESOURCES

Comment:

The Department of Water Resources provided recommendations relating to water conservation and flood control. They are attached.

Response:

We concur with the recommended water conservation measures. Some of the recommended measures are included as mitigation measures on pages 137 and 138 of the draft EIR. The remaining water conservation mitigation measures are hereby incorporated into this final EIR.

All of the mitigation measures are described below:

Required by law:

1. Low-flush toilets (see Section 17921.3 of the Health and Safety Code).
2. Low-flow showers and faucets (California Administrative Code, Title 24, Part 6, Article 1, T20-140F). (Draft EIR, page 137).
3. Insulation of hot water lines in water recirculating systems (California Energy Commission regulations).

Recommend be implemented where applicable:

Interior:

1. Supply line pressure: recommend water pressure greater than 50 pounds per square inch (psi) be reduced to 50 psi or less by means of a pressure reducing valve.
2. Flush valve operating water closets: recommend 3 gallon per flush.
3. Drinking fountains: recommend equipped with self-closing valves.
4. Pipe insulation: recommend all hot water lines in dwelling be insulated to provide hot water faster with less water waste, and to keep hot pipes from heating cold water pipes.

5. Hotel rooms: recommend posting conservation reminders in rooms and restrooms.\* Recommend thermostatically-controlled mixing valve for bath/shower.
6. Laundry facilities: recommend use of water-conserving models of washers.
7. Restaurants: recommend use of water-conserving models of dishwashers or retrofitting spray emitters. Recommend serving drinking water upon request only.\*

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Exterior:

1. Landscape with low water-consuming plants wherever feasible (Draft EIR, page 138).
2. Minimize use of lawn by limiting it to lawn depending uses, such as playing fields.
3. Use mulch extensively in all landscaped areas. Mulch applied on top of soil will improve the water-holding capacity of the soil by reducing evaporation and soil compaction.
4. Preserve and protect existing trees and shrubs. Established plants are often adapted to low water conditions and their use saves water needed to establish replacement vegetation.
5. Install efficient irrigation systems which minimize runoff and evaporation and maximize the water which will reach the plant roots. Drip irrigation, soil moisture sensors and automatic irrigation systems are a few methods of increasing irrigation efficiency.
6. Use pervious paving material whenever feasible to reduce surface water runoff and aid in groundwater recharge.
7. Grading of slopes should minimize surface water runoff.
8. Investigate the feasibility of utilizing reclaimed waste water, stored rainwater, or household gray water for irrigation.
9. Encourage cluster development which can reduce the amount of land being converted to urban use. This will reduce the amount of impervious paving created and thereby aid in ground water recharge.
10. Preserve existing natural drainage areas and encourage the incorporation of natural drainage systems in new developments. This would aid in ground water recharge.

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\* The Department of Water Resources or local water district may aid in developing these materials.

11. Floodplains and aquifer recharge areas which are the best sites for ground water recharge should be preserved as open space.

In flood-prone areas, flood damage prevention measures required to protect a proposed development should be based on the following guidelines:

1. All building structures should be protected against a 100-year flood.

It is the State's policy to conserve water. Any potential loss to ground water should be mitigated.

2. In those areas not covered by a Flood Insurance Rate Map or a Flood Boundary and Floodway Map, issued by the Federal Emergency Management Agency, the 100-year flood elevation and boundary should be known on the Environmental Impact Report.
3. At least one route of ingress and egress to the development should be available during a 100-year flood.
4. The slope and foundation designs for all structures should be based on detailed soils and engineering studies, especially for hillside developments.
5. Revegetation of the slopes should be done as soon as possible.
6. The potential damage to the proposed development by mudflow should be assessed and mitigated as required.
7. Grading should be limited to dry months to minimize problems associated with sediment transport during construction.

Comment:

Consideration should also be given to a comprehensive program to use reclaimed water for irrigation purposes in order to free fresh water supplies for beneficial uses requiring high quality water.

Response:

During the project engineering phase of the development it is recommended that an economic feasibility study be prepared on using reclaimed water for irrigation purposes. This would have the additional benefit of reducing the project's effect on the ECSD's sewerage facilities.

F. EASTERN MUNICIPAL WATER DISTRICT

Comment:

Water service. The Springs project lies within the boundaries of Improvement District No. 10 of the Eastern Municipal Water District and as such, is eligible for water service from the District. Based on the proposed project's estimated water requirement of 978,820 gallons per day and anticipated high water flow requirements for fire protection, modifications to and enlargements of existing District water supply facilities will probably be required to guarantee an adequate volume of water to the project area.

Response:

Some of the possible modifications needed to the Eastern Municipal Water District's water system may be off-site. Any such off-site work would have to be financed by the developer. The specific nature of the modifications and their costs will not be known until water system engineering plans are made. These plans will be made prior to development of the first phase of the project. All water facilities needed to serve the project would be built in a cost-efficient manner, with consideration being given to the ultimate development approved by the specific plan and by the zone change.

Comment:

Sewer service. The Springs lies within the boundaries of the Edgemont Community Services District and within the general boundaries of the Eastern Municipal Water District. Eastern Municipal Water District has been notified by Edgemont Community Services District's Engineer, Albert A. Webb Associates, that the Edgemont Community Services District will provide the sewage collection, treatment and disposal services for the proposed development.

Should this position change and, at the specific formal request of the Edgemont Community Services District, Eastern Municipal Water District could provide sewer services to the project area. To accomplish this, a sewage pump station at the southwest corner of The Springs development and approximately two (2) miles of off-site sewage force main pipeline would be required to lift and transport the area's sewage to existing District sewer pipelines in Frederick Street.

Response:

The comment is noted.

G. EDMONT COMMUNITY SERVICES DISTRICT

Comment:

(Albert A. Webb Associates, engineering consultant for Edgemont Community Services District, commented on behalf of the District).

Since our area of concern is with regard to sewerage service, the water and sewer plan outlined on pages 43-45 of the Specific Plan was reviewed. We believe the last paragraph on pages 44 and 45 is erroneous, hence needs to be revised. It appears that our January 18, 1982 letter was disregarded when the Specific Plan was prepared.

It is indicated by the project proponent that two options have been identified to sewer the proposed development. One is service from Edgemont Community Services District and the other is Eastern Municipal Water District. It is stated that "Secondly, the Eastern Municipal Water District (EMWD) has indicated that The Springs falls within their district for water services and that the capacity to accept effluent from The Springs project is either available or planned at the Eastern treatment plant in the Sunnymead area. Agreement could be arranged to shift the sewage treatment responsibility from ECSD to EMWD."

Since the project site is within Edgemont Community Services District, the District will not agree to shifting the sewage treatment responsibility to EMWD. The District does not believe that sewage treatment plant capacity is either available or planned at EMWD's Sunnymead plant for a project which is within another public district service area. Edgemont Community Services District is willing to provide sewerage service to the proposed project if the project proponents arrange a financing program acceptable to the Board of Directors.

The project proponent indicated in the Specific Plan that the advantages of shifting sewage treatment responsibility from ECSD to EMWD are as follows:

- "1. EMWD currently has capacity to treat effluent generated by The Springs: ECSD does not have capacity at this time.
2. Either proposal involves the extension of adequate sewer trunk lines. While both alternatives appear to allow a gravity flow system, extending lines to the ECSD plant would involve extensive tunneling under I-15E and the A.T. and S.F. Railroad lines; such tunneling would not be required for line extensions to the EMWD system."

The EMWD Sunnymead Plant is presently treating about 2 MGD. The plant has just been expanded to 3 MGD. However, EMWD has extended sewerage services to Improvement District U-13 which at full development could utilize this excess treatment capacity. With regard to the second comment, the Specific Plan indicated that the proposed project can be served by a gravity system. Actually, the project can only be served by a gravity sewerage system by ECSD. If the project were served by EMWD, the sewerage effluent would have to be pumped.

The Specific Plan indicated that if ECSD provided sewerage service, "extensive tunneling under I-15E and AT & SF line" would be required. If EMWD provided service, such "tunneling would not be required for line extensions . . ." For ECSD to serve the proposed project, I-15E and the railroad will have to be bored and not tunneled. However, if EMWD were to serve the project, Alessandro Boulevard would have to be crossed. This street would have to be bored rather than open cut.

To convey wastewater from the project to ECSD will require about 5700 feet of pipe. If EMWD were chosen, about 38,000 feet of pipe would have to be laid to reach the Sunnymead Plant, in addition to a pumping plant.

Response:

The comment refers to material in the specific plan document, not in the draft EIR. The information provided is noted and the suggested revision of the specific plan will be given proper consideration.

~~It should also be stated that the information referenced in the specific plan as being erroneous is not found in the draft EIR; therefore, no response is needed except that the comment is noted and is hereby incorporated into the final EIR.~~

H. METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Comment:

Metropolitan has reviewed the documents, and has no comments to make other than a reminder that we have an 80-foot-wide permanent right-of-way (fee) for our 96-inch-inside-diameter Box Springs Feeder pipeline within the project area. Project implementation will require an easement to use our right-of-way. At that time Metropolitan would become a responsible agency under CEQA and would thus be required to review and certify the final project Specific Plan and final EIR prior to our participation in the project. Therefore, we would like to request that you send us the Final Specific Plan No. 174 and Final EIR No. 168 when they are available.

Response:

The Metropolitan Water District has indicated that procedurally, the needed easement would not be difficult to obtain. However, Metropolitan Water District will require that convenient access remains available to the pipe within its right-of-way in an emergency, and that the developer pay any costs associated with ensuring that access. The use of the right-of-way would be limited to improvements such as streets, trees, bushes, yard walls, and other items that would not substantially impede access to Metropolitan Water District facilities within their right-of-way.

It is noted that Metropolitan Water District has discretionary powers regarding certain aspects of the project; therefore, it is a responsible agency as defined by Section 15039 of the California Environmental Quality Act. If the project is approved, copies of the final EIR and the specific plan will be sent to Metropolitan Water District.

I. PACIFIC TELEPHONE COMPANY

Comment:

The Draft Environmental Impact Report, paragraph 3.13.3.1 refers to telephone service being provided by both Pacific Telephone and General Telephone, and the approximate amount of area to be served by each company. The one fourth, three fourth ratio appears to be in error. The boundary line between the two companies is currently located 1320 feet south of Lawless Road. Unless this line is relocated, General Telephone will serve all but a few building sites that abut Highway 60.

Response:

The correction regarding the amount of the site to be served by Pacific Telephone is acknowledged, and is hereby incorporated into the final EIR.

Comment:

Telephone service to the commercial area outlined on the Specific Plan Document that is adjacent to Highway 60 will require a line extension from the Riverside Exchange Base Rate Area. The developer will be required to pay for this extension in accordance with applicable tariffs.

Response:

The comment is acknowledged and is hereby incorporated into the final EIR.

J. RIVERSIDE, OFFICE OF THE CITY MANAGER

Comment:

The final EIR on this project should contain an expanded analysis of the effects of this project on traffic circulation along city streets, including Central and Pennsylvania Avenues, Alessandro Boulevard, and Box Springs Boulevard.

Response:

The consultant firm of Greiner Engineering Sciences, Incorporated has prepared the response to the comment above. Levels of service expected by the year 2000 on Central and Pennsylvania Avenues and on Alessandro and Box Springs Boulevards due to the proposed "Springs" project have been calculated to be "B" for Alessandro, and "A" for the remaining three streets. The text of Greiner's report is summarized below. This information is hereby incorporated into the final EIR:

Nondevelopment traffic (P.M. peak hour)

Nondevelopment traffic for both existing and year 2010 projections were obtained from the City of Riverside. Year 2000 volumes were interpolated by using a calculated compounded growth rate. Peak hour percentages (K) and Directional splits (D) were assumed at 0.1 and 0.6 respectively. The assumption was made that the higher directional volume would be oriented out-bound from the Riverside central business district (eastbound) during the P.M. peak hour.

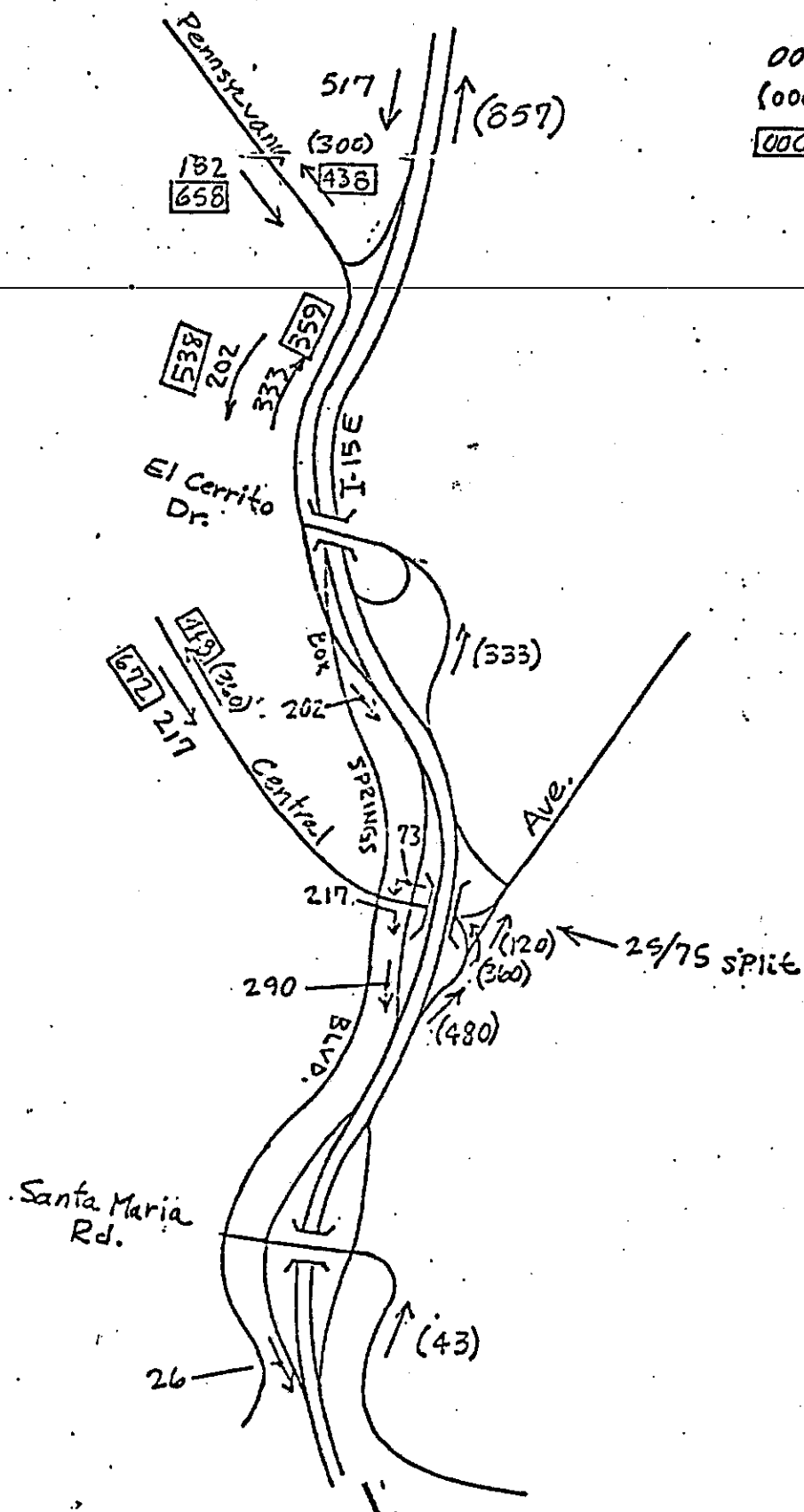
Development traffic (P.M. peak hour)

Directional development traffic volumes for the weekday p.m. peak hour have previously been calculated and assigned to the streets and highways adjoining the Springs Development Site. Volumes were assigned to Alessandro Boulevard but were not assigned to arterials feeding S.R. 60 as far away as Central Avenue, Pennsylvania Avenue, or Box Springs Boulevard. In order to make these assignments, the following assumptions were made based on the size of the primary trade area, competitive centers and data gained from similar studies at other regional developments.

Assumptions for assignment of development trips to and from S.R.60

- 1) 50% of the development-related trips on the northwest approach (S.R. 60) will originate from further away than Pennsylvania Avenue.
- 2) The remaining 50% will enter and exit S.R. 60 via Pennsylvania Avenue, Central Avenue, or Santa Maria Road interchanges.
- 3) A minimum percentage of development trips will enter and exit S.R. 60 via the Santa Maria Road interchange since alternate, parallel and equally direct routes exist along Box Springs Road and Fischer Road (5% of the total northwest assignment).
- 4) The values of the project Year 2000 ADT's on Pennsylvania Avenue and Central Avenue are indicative of the relative differences in the Springs Development-generated traffic on those routes.
- 5) Mall patrons living closer to the development will have a propensity to make more trips to the facility than those patrons living further away. Essentially, this results in a weighting of population groups by distance of trips to the development: those within 0 to 7 minutes of travel have the greatest weight; 8-14 minutes having a somewhat lower value; patrons 14-21 minutes having the next lowest weighted value; and those patrons beyond 21 minutes, the lowest trip value. This adjustment in assumption 4, above, results in a slightly higher assignment on Central Avenue and a lower assignment on Pennsylvania Avenue.
- 6) The propensity factor for development-related trips to use Central Avenue is 1.0.

# EXHIBIT "A"



- 7) The propensity factor for development-related trips to use Pennsylvania Avenue is 0.7.
- 8) Since Box Springs Boulevard connects Pennsylvania to S.R. 60 via the El Cerrito Drive interchange, the development traffic assignments for both of these arterials will be the same.

Year 2000 composite traffic

Nondevelopment traffic and development traffic volumes for the P.M. peak hour were combined to assess the total impact and determine the levels of service for Year 2000. Both development and nondevelopment traffic are shown on Exhibit A.

Level of Service

The methodology used to assess "Level of Service" was adapted from The Transportation and Traffic Engineering Handbook; 1976, pages 337 and 338, assuming a 67% cycle split and average density and speed criteria. This defines the lane capacity of the arterials to be (1500) (.67) or 100 vehicles per lane. Since each of the arterials under study are Master Plan-designated as minimum 4-lane streets the directional capacity is at least (1000 vehicles per lane) (2 lanes per direction) = 2000 vehicles per direction. This is substantially greater than the highest Year 2000 composite assignment. Volume/Capacity ratios (V/C) are calculated and compared with volume/capacity ratios corresponding to levels of service from The Transportation and Traffic Engineering Handbook, page 337. The results of this entire procedure are presented below and on Table 1.

Level of Service

|                       |    |
|-----------------------|----|
| Central Avenue        | A  |
| Pennsylvania Avenue   | A  |
| Alessandro Boulevard  | B- |
| Box Springs Boulevard | A  |

Comment:

The final EIR on this project should more clearly define the expected impacts of this project on future retail sales growth of existing commercial development, particularly at Tyler Mall and the Riverside Plaza.

Response:

The objective of the proposed project is to capture the fashion portion of department store taxable sales. The proposed project will, however, have an effect on the existing retailers in the City of Riverside including those at Riverside Plaza and Tyler Mall. Based on the Nadelson study prepared for the City of Riverside in 1977, there could be an expected 10 percent decrease in taxable sales to retailers within the City of Riverside during the first

operating year of the shopping center. It is anticipated that by the third year of the project's operation, taxable sales will have normalized at the three centers. The regional shopping center is not expected to open prior to 1988.

Comment:

The final EIR should elaborate on the cumulative impact of this project on solid waste disposal in the area.

Response:

The solid waste impact of the proposed project and the cumulative solid waste impact of other projects that have been proposed and/or approved in the Riverside, Woodcrest, and Moreno Valley areas have been described in detail on pages 138 through 141 in the draft EIR. The Mead Valley and Badlands solid waste disposal sites would be able to serve the site. To present a more complete picture of solid waste impacts, the following conclusions can be drawn:

- 1) If all of the solid waste from the project site, 31 tons per day, were transported to the Mead Valley disposal site, the 150 ton daily intake at that site would increase by 21%, or its Year 2000 life expectancy would be proportionately reduced.
- 2) If all of the project's solid waste were transported to the Badlands disposal site, the 60-70 ton daily intake there would increase by a maximum of 50%. The life expectancy of the Badlands site is unknown. However, that site is expected to be used well beyond the Year 2000.
- 3) The project's 31 tons of solid waste per day represent a maximum increase of nearly 15% over the total amount of solid waste received by the Mead Valley and Badlands sites combined.
- 4) If the cumulative solid waste produced by the other proposed projects in the area, 421 tons per day, was taken to the Badlands or Mead Valley disposal sites, the amount of waste per day received by those sites, combined, would increase by a maximum of about 200%. However, it is unlikely that all of the proposed projects would ever be built.

The draft EIR discusses solid waste load mitigation measures on pages 140-141.

Comment:

The final EIR should address the off-site impacts of this project on wildlife in a cumulative fashion.

Response:

The cumulative development that is occurring in the project area is decreasing the amount of open space and slowly changing a rural area into an urban area. As open space decreases, the wildlife that occupied the open space is forced to relocate to other open space areas. As open space acreages decrease, wildlife populations also proportionately decrease, since there is that much less food available to support wildlife. Raptors would most likely be affected the most by the loss of open space.

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The dry farming areas and the undeveloped grasslands in the project area are used for hunting by a large population of raptors during the summer months. These habitats may also be used by wintering raptors. The loss of open space results in a loss of foraging or potential nesting habitat for the raptors. Raptors would most likely be displaced in the project area since studies have shown that even a small amount of human disturbance can have an adverse effect on nesting raptors.

Other wildlife species would also be affected by the permanent loss of open space in the project area. These other species that live in the area include a variety of resident birds, mammals, and reptiles. Most of these species are considered generalists and should be able to survive in adjacent open space areas.

Development of the project will provide new habitat for those species that have adapted to the urban environment.

K. RIVERSIDE COUNTY AVIATION DEPARTMENT

Comment:

No comment.

Response:

Noted.

L. RIVERSIDE COUNTY DEPARTMENT OF BUILDING AND SAFETY

Comment:

No comment. We would appreciate a copy of the conditions of approval, when finalized, at the earliest possible date.

Response:

The Department of Building and Safety will receive copies of the final EIR and the Specific Plan after they are finalized.

M. RIVERSIDE COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH

Comment:

The EIR and Specific Plan have adequately covered our areas of concern, namely solid waste, noise, water, and sewage disposal. The documents indicate that sewer service can be provided by either the Eastern Municipal Water District or the Edgemont Community Services District. Further negotiations between the developers and the two agencies above will be needed to determine the best agency to provide sewer service. It appears that adequate water currently exists to serve the project's needs.

Response:

Both Edgemont Community Services District and Eastern Municipal Water District have clearly expressed that their understanding is that Edgemont Community Services District would provide sewer service to the site (please see comments from both agencies, elsewhere in this document).

The comments regarding the adequacy of the water supply for the site and the adequacy of the treatment in the documents of the subjects of solid waste, noise, water and sewage disposal are noted.

N. RIVERSIDE COUNTY FIRE DEPARTMENT

Comment:

The draft EIR addresses Fire Department problems. The mitigation measures are acceptable.

Response:

The comment is noted.

O. RIVERSIDE COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

Comment:

These documents recognize the off-site and on-site drainage problems associated with the proposed project. The EIR proposes specific mitigation measures that, when implemented, would provide reasonable storm protection for the site.

Response:

The comment is noted.

Comment:

On-site runoff retention may be appropriate if it does not cause a hazard and if acceptable provisions for maintenance can be agreed upon.

Response:

Prior to approval of subsequent plot plans, conditional use permits, etc. for site development, the proponent would be required to submit for Flood Control

TABLE 1

## BREAKDOWN OF TRAFFIC ASSIGNMENTS VIA ARTERIALS ON AND OFF OF STATE ROUTE 60

|                                                                      | Existing (1982)<br>ADT | Mean Yr. 2010<br>Projections* | Growth<br>Rate<br>Annually | Est. Yr.<br>2000 ADT's<br>Projections* | Assumed K<br>Factor | Assumed D<br>Factor | P.M.<br>Peak Hour<br>Volumes<br>Year 2000<br>E.B./W.B. | Combined P.M.<br>Peak Hour Vols.<br>(With Springs) | Volume/Capacity<br>Level of<br>(Worst Direction) Service |
|----------------------------------------------------------------------|------------------------|-------------------------------|----------------------------|----------------------------------------|---------------------|---------------------|--------------------------------------------------------|----------------------------------------------------|----------------------------------------------------------|
| Central Avenue<br>(Chicago-Box Springs)                              | 4,040                  | 19,750                        | 5.83%                      | 11,200                                 | .10                 | .6                  | 672/448                                                | 889/808                                            | 0.44<br>A                                                |
| Pennsylvania Avenue<br>(Trautwein - I-15E)                           | 7,067                  | 14,000                        | 2.47%                      | 10,960                                 | .10                 | .6                  | 658/438                                                | 840/738                                            | 0.42<br>A                                                |
| Alessandro Boulevard<br>(Arlington-Trautwein)<br>(Trautwein - I-15E) | 11,030                 | 26,200                        | 3.14%                      | 19,240                                 | .10                 | .6                  | 1154/770                                               | 1303/970                                           | 0.65<br>B                                                |
| Box Springs<br>(Pennsylvania-Fisher)                                 | 5,200                  | 12,100                        | 3.04%                      | 8,970                                  | .10                 | .6                  | 538/359                                                | 740/692                                            | 0.37<br>A                                                |

Calculations:

|                     | Year 2000 ADT | Propensity Factor | Factored Year<br>2000 ADT's | Percentage of Remaining Traffic Assigned |
|---------------------|---------------|-------------------|-----------------------------|------------------------------------------|
| Central Avenue      | 11,200        | 1.0               | 11,200                      | 11,200 18,872 = 59%                      |
| Pennsylvania Avenue | 10,960        | 0.7               | 7,672                       | 7,672 18,872 = 41%                       |
| Total               | 22,160        |                   | 18,872                      |                                          |

Peak Hour Inbound Traffic on S.R. 60 Using

|                                   |                                       |
|-----------------------------------|---------------------------------------|
| Santa Maria Road entrance ramp    | (1035)(.5)(.05) = 26 vehicles         |
| Central Avenue entrance ramp      | [1035)(.5) -26] (.59) = 290 vehicles  |
| Pennsylvania Avenue entrance ramp | [(1035)(.5) -26] (.41) = 202 vehicles |

Peak Hour Outbound Traffic on S.R. 60 Using

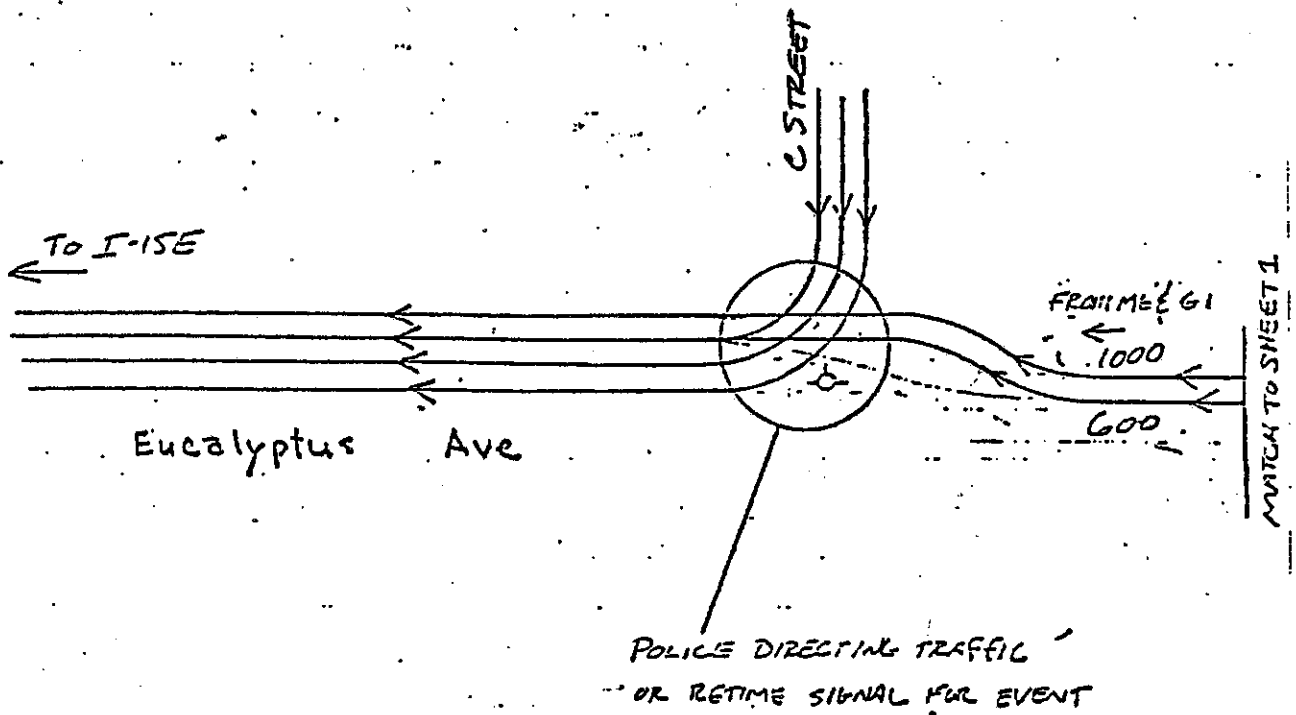
|                               |                                      |
|-------------------------------|--------------------------------------|
| Santa Maria Road exit ramp    | (1713)(.5)(.05) = 26 vehicles        |
| Central Avenue exit ramp      | [1713)(.5) -43] (.59) = 480 vehicles |
| Pennsylvania Avenue exit ramp | [1713)(.5) -43] (.41) = 333 vehicles |

\*City of Riverside - Traffic Division

EXHIBIT "C"

RACEWAY & THE SPRINGS OUT BOUND  
MOVEMENTS

The Springs



District approval design plans and proposed maintenance agreements for flood control facilities, if needed.

P. RIVERSIDE COUNTY PARKS DEPARTMENT

Comment:

The project does not affect the Parks Department

Response:

Noted.

Q. RIVERSIDE COUNTY ROAD DEPARTMENT

Comment:

We have reviewed the above referenced documents and are concerned regarding the traffic impacts associated with this proposal. The traffic analysis was limited only to the project site and the immediately adjacent street network. It is our opinion that this analysis should extend southerly of the site to include Day Street, Cottonwood Avenue and Alessandro Boulevard, as these will be the primary access routes for Moreno Valley residents in the vicinity of the project. We have also noted that while the report includes a peak hour analysis of the proposed interchange at I-15E and Eucalyptus Avenue, there is no analysis of the existing interchange at Highway 60 and Day Street.

Response:

The traffic consultant firm, Greiner Engineering Sciences, Incorporated performed an expanded traffic analysis covering the streets and intersection addressed by the comment, as well as streets in the City of Riverside, northwesterly of the project. Technical report material pertaining to the analysis is on file with the Planning Department. The analysis concluded that some off-site road system improvements would be needed if the project is developed. Please note the responses to comments from the California Department of Transportation, District 8, elsewhere in this document, for the specific improvements needed. Also, note the responses to comments from the City of Riverside for the results of the analysis on the City's road system.

Comment:

Based upon the information which has been made available thus far, we are in general concurrence with the proposed mitigation measures. However, the discussion of proposed improvements should be expanded to include their phasing.

Response:

The project proponent intends to develop portions of the site for light industrial offices, a hotel, and commercial outside the regional shopping center before the regional shopping center itself is developed. This development will be located outside the area covered by the specific plan, in the area proposed for the zone change to I-P and possibly in other areas of the site already commercially zoned. Information generated by the traffic consultants,

Griener Engineering Sciences, Incorporated, indicates that most of the site outside the regional shopping center can be developed without the need for substantial improvements off-site. The proponent is uncertain about the development schedule for this area and since it is only proposed for a rezoning, improvements relating to future land uses there cannot be required as a part of the specific plan.

With development of even the first phase of the shopping center, however, full improvements identified in the EIR as needed to support the entire project will be needed. This includes off-site road widenings, traffic signals, and an interchange at I-15E and Eucalyptus Avenue.

Based on the foregoing, phasing of improvements in the specific plan is not recommended. Improvements needed to support the first-developed land uses on the site area located outside the specific plan can be required, as needed, during site plan reviews following the proposed rezoning. However, prior to development of even the first phase of the specific plan, full on- and off-site road improvements will be required.

Comment:

We would appreciate a conceptual circulation plan for the overall project.

Response:

Circulation improvements needed to support the project and design concepts that the improvements will follow are presented on pages 124-127 of the draft EIR, pages 40-43 and 60-63 of the draft specific plan, and responses to comments from the California Department of Transportation, District 8, presented in this document.

R. RIVERSIDE COUNTY SHERIFF'S DEPARTMENT

Comment:

If Moreno Valley incorporates, traffic services previously provided by the California Highway Patrol would be provided by the new city, via a contract with the Sheriff's Department, and the costs are not mentioned in the public safety section of the EIR.

Response:

The comment was written on March 16, 1982. Since then, on April 13, 1982, an election was held in which incorporation for Moreno Valley was narrowly defeated. The closeness of the recent election, however, indicates that there is substantial local interest in incorporation. Therefore, it is likely that the incorporation issue will be presented before Moreno Valley citizens again. In this regard, the Sheriff's Department comment remains significant.

The California Highway Patrol performs accident investigation and traffic control services in the Edgemont-Sunnymead area. The Highway Patrol currently provides two patrol units per day to the area to perform those services. At a cost of \$196.32 per unit per day, those services cost \$143,314 per year in 1980-81 fiscal year dollars. This cost would be borne by the potential new city if it desired to maintain the same level of service that now exists under the Highway Patrol.

It is now known how the proposed project would affect accident investigation and traffic control costs. However, it is likely that accidents and accident investigations would increase in the vicinity of the shopping center because of the influx of regional traffic. Also, traffic control on public streets near the Riverside International Raceway during major events is currently provided by the Highway Patrol. The need for traffic control personnel may increase or decrease with the proposed project, depending on such factors as the use of signalization, the levels of roadway improvements, and possibly other factors.

#### S. RIVERSIDE INTERNATIONAL RACEWAY

##### Comment:

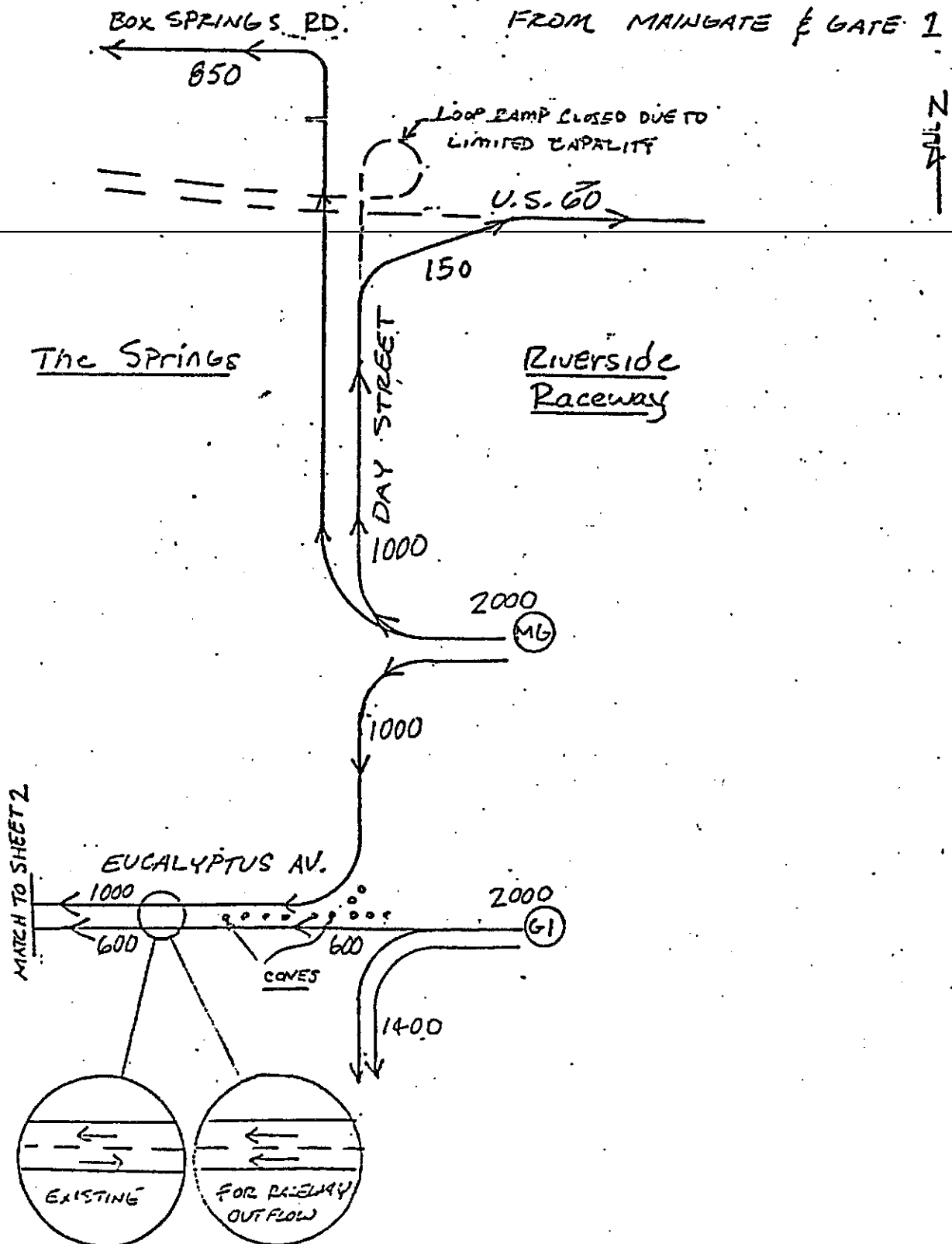
We believe there will be significant negative traffic impact resulting from the site plan submitted. The site plan provides a single means of freeway (Highway 60) ingress and egress via Day Street. Coupled with traffic generated by the Raceway during events, we believe the traffic burden would be unreasonable given the magnitude of the project. Access provided via Eucalyptus Avenue is the alternate means of entering the proposed project. The Draft EIR does not resolve the impact resulting to surrounding residential properties and the Eucalyptus Avenue school that the proposed project will create when added to existing traffic generated by the Raceway and others.

##### Response:

A consultant firm hired by the project developer, Greiner Engineering Sciences, Incorporated, has prepared an analysis of the intermixing of raceway-oriented traffic with project-oriented traffic. The study concludes that for most raceway events, the road improvements that are needed to upgrade Day Street and Eucalyptus Avenue in order to support the proposed project will also accommodate combined raceway and project traffic. However, for major events, which occur about five times per year, the intermixing of raceway and project traffic will cause low levels of service along Day and Eucalyptus. To partly mitigate this problem, the consultant has proposed a traffic control plan that is similar to that already used in conjunction with major raceway events. Even with this plan, access to the project site would be restricted during raceway egress times, and the major intersection providing access to the project site from Eucalyptus would operate at a level of service "F" (total breakdown of traffic flow). The proposed traffic control plan is diagrammed in figures "B", "C" and "D". California Highway Patrol traffic control personnel would direct traffic at critical traffic points; however, temporarily retimed traffic signal phasing may be adequate to control traffic without using police personnel.

# EXHIBIT "B"

## RACEWAY OUTBOUND MOVEMENTS FROM MAIN GATE & GATE 1

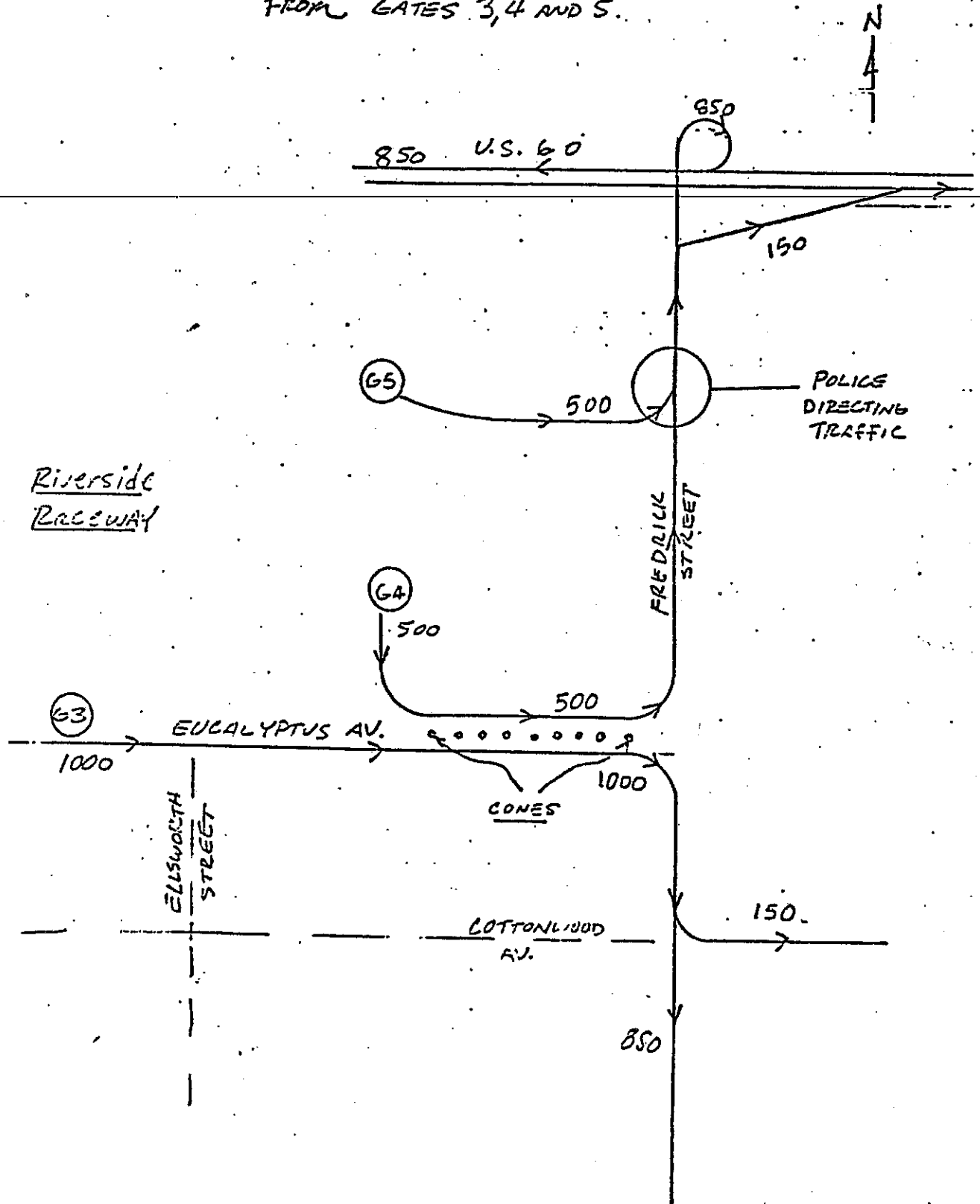


CONVERT TO 2 WESTBOUND

TRAF. DURING CRITICAL HOURS:

EXHIBIT "D"

RACEWAY OUTBOUND MOVEMENTS  
FROM GATES 3, 4 AND 5.



During most raceway events, raceway traffic generation is small, and it would not result in substantially worsened traffic conditions than would exist with project traffic, alone. During major raceway events, the use of the traffic control plan would almost totally preclude the mixing of raceway and project traffic. This is because ingress to the site would only be possible from I-15E via Eucalyptus and the main entrance to the site from the latter street and from California 60 via Day Street and its access points to the project site. Egress from the site would only be possible from the main Eucalyptus Street access point, then from Eucalyptus to I-15E. Raceway traffic would be directed southward and northward on Day Street and westward on Eucalyptus Avenue, as it is today. Based on the foregoing, the impact on nearby residences and the school by combining raceway traffic with project traffic is not expected to be substantially greater than the effect of either project traffic, alone, or raceway traffic, alone.

The consultant's proposed traffic control plan is summarized below:

Ingress:

Prior to a major racing event, the arrival of spectators will begin hours before the race. Campers (up to 10% of the total number of spectators) will arrive the day before the event. The highest volumes prior to an event will occur in the 90 minute period before the race begins. During this period, the County's existing Ingress Traffic Control Plan should be enforced. This should not present an untenable situation to "The Springs" as this period will occur generally on Sunday morning, and occasionally on Saturday morning. On Saturday mornings, when it is necessary to activate the Ingress Control Plan, the Springs Development will not be generating traffic at its full potential, as only the mall will be open. Arrivals to the mall from the north along Day Street will be permitted to blend with inbound raceway traffic. The proposed interchange at I-15E and Eucalyptus Avenue should provide sufficient capacity to accommodate both inbound mall and raceway trips.

Egress:

As stated above, the most critical period will be immediately following an event. During this period, a substantial number of mall patrons will be enroute to the site at the same time that virtually all (90%) of the raceway traffic is departing. This period will begin at approximately 4:00 p.m., generally on Sundays. To accommodate the simultaneous ingress and egress of the mall with the egress of the raceway, an Egress Traffic Control Plan is necessary. The plan formulated is adapted from the County's existing egress plan which was revised in May 1982.

Main Gate - Traffic exiting at the main gate will have the option to travel either north or south on Day Street. Northbound traffic (two lanes) will be permitted to either turn right (one lane) on SR 60 or continue along Box Springs Road (one lane) to the SR 60/Santa Maria Road interchange, where full access options are available. Southbound traffic will be channelized westbound on Eucalyptus Avenue to I-15E where full access options, via the new interchange, will exist.

Gate 1 - Traffic exiting at Gate 1 will have the option to depart westbound on Eucalyptus Avenue or southbound on Day Street. Traffic using Eucalyptus Avenue from Gate 1 will be channelized into the eastbound lane, making Eucalyptus Avenue one-way, westbound between Day Street and the Springs Access Drive. Traffic using southbound Day Street will be given both lanes making Day Street one-way between Eucalyptus Avenue and Alessandro Boulevard.

Gate 3 - Gate 3 traffic will depart eastbound via Eucalyptus Avenue to Frederick Street and then southbound to Cottonwood Avenue or Alessandro Boulevard.

Gate 4 - Traffic exiting at Gate 4 will be channeled eastbound via Eucalyptus Avenue and then northbound on Frederick Street to the full access options at SR 60.

Gate 5 - Gate 5 exiting traffic will be merged into the northbound traffic on Frederick Street from Gate 4 and routed to the Frederick Street/SR 60 interchange.

Using this plan, which gives virtually all of the capacity of Eucalyptus Avenue, Day Street, and Frederick Street to raceway traffic, it will take approximately 2.8 hours for exiting raceway traffic to clear.

Calculation:

50,000 people

2.7 people/vehicle\* = 18,519 vehicles

(18,519)(.90) ninety percent = 16,667 vehicles departing

|                    |            |
|--------------------|------------|
| Main Gate Capacity | = 2000 vph |
| Gate 1 Capacity    | = 2000 vph |
| Gate 3 Capacity    | = 1000 vph |
| Gate 4 Capacity    | = 500 vph  |
| Gate 5 Capacity    | = 500 vph  |
| Total Capacity     | = 6000 vph |

$$\frac{16,667 \text{ vehicles departing}}{6,000 \text{ vehicles departing/hour}} = 2 \text{ hours } 48 \text{ minutes}$$

Comment:

The draft EIR does not address the lack of suitability of the site access for the uses contemplated by the project. Although the site has high visibility, it lacks access normally associated with projects of the scope contemplated. The site plan submitted fails to solve any of these inherent conditions and limitations. There is no direct access to the proposed mall. Users must

drive past the proposed mall on Highway 60 to reach the Day Street interchange and then back track through other proposed uses. I-15E traffic must exit at Eucalyptus before sighting the project and enter through a residential and school area. It is our opinion the access limitations may not be mitigated through an interchange at I-15E and Eucalyptus. We have long been involved in the administrative process relating to freeway status improvement and I-15E. We do not believe such an interchange is desirable or economically feasible, and we consider the present CALTRANS interchange at Alessandro (which is already being processed) satisfactory to serve the needs of the area and incompatible with a proposed Eucalyptus interchange.

Response:

The comment regarding the indirect access to the shopping center addresses the internal design of the project, but does not pertain to potentially significant environmental issues. Therefore, it will not be given a response in this final EIR. However, the point is noted and will be considered in the continuing County review of the proposed project.

Staff has discussed the viability of the proposed interchange at I-15E and Eucalyptus with CALTRANS officials. According to the latter, the interchange could be constructed, from a technical standpoint, without reducing the viability of other anticipated I-15E improvements, including the proposed Alessandro Boulevard interchange. The CALTRANS District 8 office has included the proposal for the Eucalyptus Avenue interchange in its "Stage 2" Proposal to the Sacramento CALTRANS Office for the overall improvement of I-15E in the site vicinity to freeway status. The Sacramento office would have to approve the concept before it could continue being administratively processed along with the remainder of the I-15E improvement plans. The County has just been notified by CALTRANS, District 8 that the Sacramento CALTRANS office has approved the Eucalyptus interchange proposal for further planning analysis.

According to the local CALTRANS officials, if the Eucalyptus/I-15E interchange concept is approved, the affected local agencies, i.e. the County and City of Riverside (via benefitting developer(s)) would be responsible for financing the total cost of the intersection minus the cost of CALTRANS' originally proposed Eucalyptus Avenue overpass at I-15E.

The cost differential is preliminarily estimated to be \$2,000,000. Also, the improvement of I-15E to freeway status in the vicinity of the site is not included in CALTRANS' current five-year work program. Even if it were included in a subsequent work program, it is not known whether it would be rated as a high priority project. In summary, the viability of the proposed I-15E/Eucalyptus interchange is not known at this time.

Comment:

The proposed site plan seeks to buffer existing residential and school areas along Eucalyptus with light industrial. This use is incompatible with the surrounding area and offers a significant negative effect when coupled with the proposed mall use. The Draft EIR does not adequately address this issue nor the possible future impact of the proposed uses, including light industrial, with respect to future development and existing adjacent properties east of Day Street and south of Eucalyptus.

Response:

Land use compatibility between the existing school and residences and the proposed light industrial area is discussed in detail on pages 49, 55, and 56 of the draft EIR. The draft EIR concludes that potential incompatibility problems due to dust, noise, odors, vibration, and glare can be mitigated by incorporating into the industrial area buffers from the residential areas and school such as berms, landscaping, and distance. Also, it should be noted that walls could be used as a buffer. The buffering concept can be taken a step further by designing the land uses, access thereto, storage areas, etc., associated with the industrial development so as to orient its least compatible and/or aesthetic activities away from the residential areas. Eucalyptus and Day Streets, when improved as needed by the project, can serve as "natural breaks" between the project and land uses that may be developed east of Day and south of Eucalyptus.

Comment:

The proposed site plan attempts to utilize approximately 342 acres in some form of commercial or industrial use. Wholesale commercial and industrial zoning of this type has the ultimate effect of prematurely and artificially increasing and escalating land values in the area without actual user development creating the proposed demand. Respective parcels may be resold to other investors who perpetuate artificial values by holding and reselling. Residential uses are ignored when much of the site is appropriate for this use. In accordance with the County General Plan, a proposed hotel site has already been designated and rezoned at the northeast corner of Day Street and Highway 60.

Response:

According to a market support analysis prepared for the project by Coldwell Banker Company, dated October 1981, there will be adequate market support for an 800,000 square foot regional shopping center, including three anchor stores, by 1985. The report further states that the market support for an additional anchor store is sufficiently strong to warrant reservation of a fourth anchor store pad location on the site plan.

The industrial (I-P) rezoning proposal covers an area already designated on the General Plan for industrial uses, not residential uses. Most of the industrially-rezoned area would be developed for uses such as offices or light industrial activities that would be expected to be supported by their adjacency to the shopping center.

Comment:

It is our understanding the Edgemont Community Services District does not have sufficient capacity to serve the proposed development. The draft EIR does not address itself to the economics, including sources of funding and impact upon present users, of those improvements necessary in order to provide adequate sewer and related services to the project.

Response:

Please note the response to a comment from the California Regional Water Quality Control Board, Santa Ana Region, presented earlier in this document, for a partial response to this comment. Also, please see page 134 of the Draft EIR for detailed information regarding the costs associated with the sewage transmission and treatment facilities needed to serve the project.

Comment:

We believe the project is inappropriate in consideration of the site limitations, proposed uses and access problems discussed above. It is apparent that regional malls have become focal points of local communities. Much of the synergism of the local community in close proximity to regional shopping facilities is dictated by and occurs around the mall itself. As a result of the varied impacts, we believe good planning dictates extensive community involvement through the governmental process in determining where a mall should be located. This process should take place in an entire General Plan review rather than responding to one or more sites initiated by investors or developers. It should be initiated by the General Plan review process rather than a product of or reaction to a specific plan dealing with one parcel. This approach has been followed by many other communities where a single "future regional mall site" was designated after adequate planning review. Such planning ensures a more orderly development of the entire community and may encourage the desired regional development at an earlier date than otherwise achievable with multiple sites competing and ultimate legitimate users deferring decisions waiting to "see what happens in the Moreno Valley."

Over the years, we have studied various land use plans for the excess property not required in the operation of the Riverside Raceway and in conjunction with previous and proposed improvements to the Raceway itself. This planning has continued with a view towards complementing the development of the area surrounding the Raceway and mindful of the long-term quality development approach of our ownership. The planning process has taken into consideration the extended interim nature of our use, market conditions and economic feasibility of various proposed uses.

In conjunction with a redevelopment plan being studied at this time for the Raceway property, a regional mall site has been included fronting on Highway 60 and accessed via the Day Street and Frederick Street interchanges. This plan includes the continued operation and redevelopment of the Raceway itself and is similar in compatibility of uses to the successful Santa Anita Fashion Park project. We believe such a joint use offers a unique planning opportunity consistent with the Santa Anita concept.

Our analysis of these preliminary studies has included market evaluations as well as direct contact with most major department store retailers. None of the department store users considers the Moreno Valley within the scope of their five-year planning cycles, and post-1990 considerations are entirely dependent upon future building activity and economic considerations not ascertainable at this time. While our ownership

could readily align with any number of reputable national mall developers and commence a more specific planning process, it is apparent such action would be entirely premature and unduly burden the County planning staff. More importantly, development of the Valley over the next three to five years may dictate planning concepts not apparent at this time. We intend to continue to study the matter and monitor the planning and development process in this regard.

We suggest the County planning staff encourage a General Plan review that will take into consideration the more apparent uses suitable for the property which is the subject of the draft EIR submitted. The largely undeveloped area of the Moreno Valley offers an opportunity to set an example for growth and responsible development at all economic and commercial levels. Undue concentration of any use or density, whether low cost R-6 residential, commercial or industrial, creates an adverse reputation and stigma attached to many Southern California communities with which we are all familiar. It is our hope and anticipation that responsible planning disciplines and review will avoid such a result and assure an attractive, well-planned Moreno Valley community.

Response:

The foregoing comment does not address the adequacy of the draft EIR. However, the comment is noted. The information will be considered during further County review of the proposal.

T. SOUTHERN CALIFORNIA GAS COMPANY

Comment:

The second and third lines of the first paragraph on page 197 should be corrected as follows: Change "(100 therms = 1 cubic foot)" to read "(100 cubic feet = 1 therm)."

Response:

The correction is hereby incorporated into the final EIR.

### III. ANALYSIS

#### A. EFFECTS FOUND TO BE SIGNIFICANT AND REQUIRE MITIGATION MEASURES OR OVERRIDING FINDINGS

##### 1. Circulation:

The total development contemplated, which would encompass about 311 acres bounded by California Highway 60, I-15E, Eucalyptus Avenue and Day Street, except for a school and several residences fronting on Eucalyptus, would generate 72,140 average daily trips. Within the aforementioned boundaries, the regionally-oriented retail uses, encompassing 115 acres and addressed by the specific plan, would generate 44,450 average daily trips. About 153 acres, proposed for rezoning to I-P, are expected to be developed for light industries, offices, and other uses that would generate more than 19,112 average daily trips. The remainder of the project, which is already zoned C-P-S (Scenic Highway Commercial) and is not included in either the specific plan or rezoning proposal, would contain community and highway commercial uses that would generate nearly 8,578 average daily trips.

Traffic generated by the project has been assumed to be distributed as follows: 30% from the south via I-15E, 30% from the northwest via I-15E/Cal. 60, 20% from the east via Cal. 60, and 10% from the south and 10% from the east on local streets. This traffic would dramatically increase the load on Eucalyptus Avenue, Day Street, I-15E, and Cal. 60, and would to a lesser extent impact Alessandro Boulevard to the south and roads to the northwest that connect the site to the City of Riverside such as I-15E/Cal. 60, Central Avenue, Pennsylvania Avenue, and Box Springs Boulevard. For example, some of the greatest impacts in terms of increased traffic loads would be as follows: On Day Street, just south of the interchange with Cal. 60, daily traffic would increase from the existing 700 vehicles to 26,410 vehicles. Further south along Day, just north of its intersection with Eucalyptus, daily traffic would increase from 700 vehicles to 8,370 vehicles. Along Eucalyptus Avenue, in the vicinity of the school and the residential area, traffic would also increase from 700 daily trips to 8,370 vehicles. Along Eucalyptus, between I-15E and the main entrance to the site, traffic would increase from 700 daily trips to 33,630 daily trips. (Due to late changes in the traffic distribution assumption, these figures may vary slightly.) If the "Springs" project were not built, the existing traffic on Day and Eucalyptus, 700 vehicles per day, will only increase to 1,160 vehicles per day by 1992. The existing roads would be able to easily handle this increase without improvements.

The project's traffic impacts, if unmitigated, would result in a general breakdown of the area's circulation system. The impacts could be mitigated; however, an extensive network of on- and off-site road improvements will be needed to mitigate traffic impacts at project build-out. Major features of the improvements would include:

- 1) A full interchange at I-15E and Eucalyptus Avenue
- 2) Signalization at the following locations: the interchange ramps at I-15E and Eucalyptus Avenue, the intersection at Eucalyptus, and the main access road to site, the interchange ramps at Cal. 60 and Day Street, all three intersections between site access roads and Day Street, the intersections at Day and Cottonwood Avenue and at Day and Alessandro Boulevard, and at three locations along site interior roads that connect the proposed regional shopping center directly to Eucalyptus or Day.
- 3) Full road improvements along Day Street to accommodate four lanes of traffic with dual lane left turn pockets and free right turn lanes at various locations, and alterations to the ramps at the existing Day/Cal. 60 interchange.
- 4) Widening of Eucalyptus Avenue between I-15E and the main access road to the site, a distance of about 700 feet, to accommodate essentially eight lanes of traffic including long, dual left-turning lanes.
- 5) An extensive on-site road system, where each of the three access roads to Day Street would be four-laned, with separate right turn pockets, and where the main access road to Eucalyptus Avenue would be seven-laned at its intersection with Eucalyptus, including a three-lane right turn configuration.
- 6) Possible freeway improvements, in addition to a Eucalyptus/I-15E interchange, as determined by CALTRANS. The project will generate high volumes of traffic along I-15E and Cal. 60. A weaving (merging movements) analysis was performed to illustrate problems that will result due to the weaving movements between through traffic and project oriented traffic near the Eucalyptus/I-15E interchange, the Day Street/Cal. 60 interchange, and the I-15E/Cal. 60 interchange. The results show that at project buildout, weaving will result in levels of service "D" (unstable flow, at design capacity) on northbound I-15E (two lanes) between Eucalyptus and Cal. 60, and on westbound Cal. 60 (two lanes) between Day Street and I-15E. By widening each freeway an additional lane, the levels of service on each would rise to "B" (satisfactory).

About five weekends a year, Riverside International Raceway hosts major events that can attract about 50,000 people (in about 18,519 vehicles) per event. Currently, the California Highway Patrol provides personnel to direct traffic in the vicinity of the raceway during major events. On the west side of the raceway, traffic is directed along Day Street and Eucalyptus Avenue according to traffic control plans devised especially for raceway events. During these events, through-traffic and traffic opposing the dominant traffic flow associated with the raceway events is rerouted using traffic cones, traffic control personnel, etc. During raceway egress times, potential traffic conflicts between the

the raceway and the project would be the most severe. The traffic consultant has recommended an egress traffic control plan that is similar to that used currently. Essentially, most of the capacity of Eucalyptus and Day would be used to empty raceway traffic. During this time, ingress to the shopping mall would be unrestricted except that westbound Cal. 60 traffic would use the I-15E/Eucalyptus Avenue route to the site, instead of Day Street. Egress from the shopping mall would be highly restricted. The only route out of the site would be the main access road to Eucalyptus, then to I-15E. Even with this plan, the Eucalyptus Avenue/main site access road intersection would operate at a level of service "F" (total breakdown of normal traffic flow). The plan would be in effect until raceway traffic is cleared, nearly three hours. Traffic would enter the raceway in the morning, when mall traffic would be lighter. The traffic consultant recommends that the existing ingress traffic control plan be used. Under this plan, ingress and egress associated with the shopping mall would not be restricted.

Though the impacts due to the mixing of raceway and shopping center traffic would be significant, they would be periodic and would not warrant permanent road system improvements.

Mitigation of traffic impacts can include the provision of bus turnouts and bus loading zones for passengers, park 'n ride facilities, and incorporation of design concepts that will minimize conflicts between pedestrian and traffic movements.

The Circulation Element of the County's General Plan designates Day Street as a Major Highway with a planned 100' right-of-way. In order to implement the needed improvements, the Circulation Element needs to be amended to provide for a 110' Arterial Highway between Cal. 60 and Eucalyptus Avenue. Eucalyptus Avenue is designated by the Circulation Element as a Secondary Highway, 88' planned right-of-way. To upgrade Eucalyptus as proposed between I-15E and the main entrance to the site, an amendment to the Circulation Element will also be needed, possibly to Arterial Highway with a specific plan status to accommodate improvements that would exceed normal Arterial Highway standards.

In order to accommodate the improvements required along Eucalyptus Avenue, it may be necessary to acquire right-of-way from several properties that contain residences. If the right-of-way cannot be secured, development of the project could be adversely impacted.

The developer would generally be responsible for all on-site roadway improvements, all project perimeter improvements, and off-site improvements where the project is creating the immediate or possibly ultimate need for them. Funding contributions would be derived directly from the developer, or indirectly through his successors in interest in the project by formation of an assessment district. It may also be possible to include other benefitting properties in an assessment district. Some state/federal funds may become available to assist in making improvements to I-15E and Cal. 60.

The viability of the project depends on whether or not an interchange can be built at I-15E and Eucalyptus Avenue. CALTRANS' freeway improvement plans called for an interchange at I-15E and Alessandro Boulevard, but just a grade separation crossing at I-15E and Eucalyptus. The developer had persuaded the local CALTRANS' office to consider development of an interchange at I-15E and Eucalyptus. The local CALTRANS office (District 8) included the interchange in its "Stage 2" proposal to the Sacramento CALTRANS headquarters. The Sacramento office must approve the proposal before it can proceed in planning. CALTRANS, District 8 has just received notification from Sacramento that the Eucalyptus/I-15E interchange concept is approved for further consideration. However, none of the improvement plans for I-15E from Alessandro Boulevard through Edgemont to Cal. 60 are in CALTRANS current five-year work program. In fact, the first planned improvement, the I-15E/Alessandro interchange, is not expected to even receive funding for part of the needed right-of-way acquisition to accommodate that facility until 1988 or 1989. CALTRANS has indicated that the developer would need to finance the cost of the full I-15E/Eucalyptus interchange minus the cost for the originally planned grade separation crossing planned there, about \$2,000,000. Since the developer desires to have the regional shopping center on-line by 1986, he may have to front the entire cost of the interchange, and work out a program to possibly receive reimbursement when public funds for the project become available. It should be noted that since CALTRANS' improvement plans for I-15E are in an early stage of planning any work on that highway will have to await a long project review and EIR process, no matter who pays for the improvements.

Cumulative impacts of increased traffic in the area will also affect I-15E and Cal. 60 in the vicinity of the project. In recent years, traffic volumes on these freeways have been increasing at an average annual rate of 8.3%. I-15E would be most heavily impacted by cumulative increases in traffic. Existing average daily traffic on I-15E south of Van Buren Boulevard is 31,000 vehicles. "The Springs" project would increase the traffic by 21,642 vehicles/day. Large, recently approved or currently processed projects in the Sun City area could add 44,253 vehicles/day. It is not likely that either the 8.3% increase in background traffic will continue indefinitely nor that all of the cumulatively impacting projects will be built. However, the foregoing figures illustrate the expected dramatic increases in traffic along I-15E and the need for additional improvement of that highway.

## 2. Noise

Traffic using "The Springs" project will increase on nearby residential streets and will increase the general level of noise perceived by residents. Day Street, southerly of Eucalyptus Avenue and Eucalyptus between Day and the main access to "The Springs" will receive the greatest noise impact. It has been calculated that a noise level of 65 dB would lie about 44 feet from the centerline of Day Street in the vicinity of residences along that street. Some residences along Day Street could be directly exposed to noise levels of 65 dB or greater. There is no practical way to mitigate noise impacts on existing residences. Although the residences in this area are already impacted by noise from March Air Force Base, traffic noise would be of a different type and frequency.

The residences and school along Eucalyptus Avenue could also be adversely impacted by noise from construction vehicles using Eucalyptus Avenue for access to the site, and from construction equipment being operated on the site behind the houses and school. This noise impact can be partly mitigated by not allowing construction vehicles to use Eucalyptus Avenue easterly of the main project access road.

Traffic using the interior roads and parking areas on the project site could create annoying noise. This can be mitigated by providing barriers such as berms or walls between the site and the residences and school, or by orienting circulation facilities toward the interior of the site, away from the residences and school.

### 3. Wastewater Treatment

The site is located within the boundaries of Edgemont Community Services District (District). The District is currently undertaking the planning process needed to expand their existing 280,000 gallons per day capacity sewage treatment plant to 700,000 gallons per day capacity. This new facility is in the advanced stages of planning and may be under construction soon. The expanded treatment plant is expected to handle the existing needs of the District and accommodate growth in the District until about the year 2000. Industrial land uses in the District had been expected to expand, but little change was expected in the acreage devoted to commercial uses. The proposed zone change and specific plan, however, would dramatically increase the amount of industrial and commercial land use acreage in the District. Full development of the project will result in the generation of 800,000 gallons per day of sewage. Therefore, additional treatment plant capacity will be needed to handle the project itself. Additional expansion of the District's treatment plant is technically feasible, according to the District's engineering consultant. Further expansion would occur in an economically-sized unit that would handle about the same amount of sewage that the built-out "Springs" project would generate. The District's consultant has indicated that the developer would purchase temporary capacity in the currently planned treatment plant to accommodate the early stages of the project until such time that the volume of sewage generated becomes great enough to justify expansion of the plant by construction of a second treatment unit. The developer would be responsible for financing the second unit. The cost of the unit would range from \$3.00 to \$4.50 per gallon of capacity. For 800,000 gallons of capacity, the total cost would range from \$2.4 million to \$3.6 million. A new, 18-inch diameter sewer pipe would have to be laid from the site to the treatment plant, a distance of about 5,700 feet, to provide service from the District's treatment plant. The total cost, including boring under I-15E, would be about \$690,000.

4. Water:

The project lies within the water service boundaries of Eastern Municipal Water District. The project, at buildout, would demand about 978,820 gallons of water per day. About 178,820 gallons per day of the total above would be used for landscape irrigation. Even in consideration of the cumulative demands on water by other proposed projects in the County, enough water is expected to be available to serve the project. However, water conservation is a significant concern in this area. The project can lessen its total water demand by incorporating a variety of conservation features into both indoor and landscape plumbing. Also, the use of native drought resitant plants in project landscaping would reduce water consumption.

Because of the high water demand of the project and its high fire flow requirements, off-site improvements will probably be needed to the Eastern MWD's water facilities in order to serve the project. The specific changes needed and their cost will not be known until detailed engineering plans are made. However, the developer would have to finance both on- and off-site water system improvements serving the project.

5. Police Protection:

The County Sheriff's Department provides most police protection services in the area. The California Highway Patrol performs accident investigation services and some traffic control duties (at Riverside International Raceway events).

The proposed project will result in a general increase in crime, traffic accidents, and possibly the need for additional traffic control services. This could result in increased costs to both the Sheriff's Department and the Highway Patrol. The impacts can be partly mitigated by providing street lights, by designing street patterns to slow traffic, and by providing high grade security hardware in the project's buildings and yards. Also, private security personnel could be hired to patrol the shopping center. Traffic control impacts can be minimized by incorporating on- and off-site road improvements as recommended elsewhere in this document.

6. Solid Waste Disposal:

Both the Badlands and the Mead Valley Disposal sites would be available to accommodate the project. The Mead Valley site is estimated to have a year 2000 life expectancy. The Badlands site is expected to be operable well beyond 2000. The project, which would produce about 31 tons of waste per day, would increase the combined daily waste intake at the two sites by about 15%. This impact can be partly mitigated by establishing a program in the shopping center and industrial area to recover reusable waste materials. The cumulative wastes of other projects proposed in the Riverside, Moreno Valley, and Woodcrest areas, if all built, would cause the daily waste intake at the two disposal sites to increase by 200%, probably drastically reducing their lifespans. The County will need to continue planning for alternative waste disposal sites or alternative procedures such as waste recovery in order to handle great increases in solid waste generation.

7. Hydrology:

The project site is very gently rolling and it gradually slopes downward toward the southwest. There are existing drainage facilities underneath I-15E and Eucalyptus Avenue that carry runoff from the site into Sycamore and Box Springs Canyons, west of I-15E. Development of the site will largely remove the permeable soil now covering its 268 acres and replace it with impermeable streets, parking lots, buildings, and other facilities. This will increase runoff from the site, and if the runoff is not properly managed, it will overload existing drainage facilities in the area. This impact can be mitigated by grading the site to retain existing interior drainage areas, by constructing a major storm drain in or along Day Street, by providing stormwater retention basins on-site near existing drainage facilities leading off-site in order to control runoff into those facilities, and possibly by constructing on-site storm drain systems. Depending on the type of retention basin used, the developer may need to enter into a maintenance agreement with the County to ensure that the basins do not become a financial burden on the County. Siltation may impact surrounding waterways, roads, and private property during project construction because of the exposure of soil to erosion during on-site grading and construction. This can be mitigated by using temporary vegetative cover on exposed areas, by using retention basins to trap silt heading off-site, and by using sand bags to slow storm water velocities in construction areas.

8. Air Quality:

The project will create short-term dust and construction equipment emissions pollution. It would result in long-term pollution from motor vehicles, the burning of natural gas, and off-site generation of electricity. The project would result in contributions to local air pollution that range from about 1/2% to about 6 1/2% of the pollution generated in Riverside County, depending on the type of pollutant. The project itself is considered a receptor of vehicle trips, and not a generator such as a residential project. This means that the motor vehicle pollution due to the project does not necessarily represent new pollution to the area, but instead is a redistribution of existing emissions. However, in providing a major shopping center and employment opportunities, the project will stimulate further residential growth in the county. Although the project is consistent with the Air Quality Management Plan, it would result in a significant impact on air quality since according to a South Coast Air Quality Management District definition, it would increase concentrations of some local pollutants by more than 2%.

Dust impacts during construction can be mitigated by using normal wetting procedures on graded areas. Air quality impacts can also be lessened by providing public transportation to the site, by using solar assisted heating systems, and by using solar access and design techniques in site plans.

9. Energy Conservation:

It is estimated that the project would consume about 127,661,350 kilowatt hours of electricity per year, 45,622,000 cubic feet of natural gas per month, and about 25,682 gallons of motor vehicle fuel per day. Although this energy consumption would likely be consumed elsewhere if this project were not built, nevertheless an impact on energy resources would occur. Impacts on natural gas can be mitigated by incorporating solar energy systems into building designs to assist in air, water, and pool heating. Also, glazed windows should be oriented toward the north and south to reduce electricity usage associated with air conditioning. Alternatively, the use of attic fans, roof overhangs, movable external shading on windows, and heat reflective glass on east and west exposures can reduce the need for air conditioning. The use of fluorescent lighting will reduce electricity consumption. Impacts on motor vehicle fuel may be reduced by providing an efficient, attractive public transportation system to serve the site. The site could also be used as a park 'n ride station to further reduce motor vehicle usage.

10. Visual Environment:

Gently rolling and covered with grasses, the site does not contain any outstanding visual features. However, development could substantially alter its existing low profile and block nearby residents' views of surrounding mountains. Also, the use of large parking lots, storage areas, etc. adjacent to existing residential uses and streets would not be compatible with them. Visual impacts can be mitigated by designing building groups to maintain existing viewsheds of the valley floor and surrounding mountains and to vary and soften the face of the project to avoid a monotonous appearance. Visual impacts can also be mitigated by designing landscaping, berms, and signs so as to be effective and attractive.

11. Housing Availability:

The project will generate 6,627 new jobs at buildout. This will result in an increased demand for housing in the vicinity of the project. The demand will be most pronounced from the lower and moderate income levels. Ample affordable housing for those income groups will need to be available in the Edgemont-Sunnymead area. The available vacancy rate in Regional Statistical Area No. 46, which contains the project, is 7.9%, above the County unincorporated average of 5.1%. However, whether or not available units would be priced affordably for the project's employees is unknown. The impact on housing can be mitigated by using the programs outlined in the County's Housing Element, including the "R-6 Zone", to provide ample affordable housing.

12. Fire Protection:

The County Fire Department provides fire protection services in the vicinity of the site. The Fire Department operates fire stations in Edgemont, Sunnymead, and Highgrove, which are 1 1/2, 2 and 5 miles from the site, respectively. While the Edgemont and Sunnymead Stations are within five minutes response time of the site, the stations are constructed and equipped to only handle a predominantly residential area. The project would create an additional demand for fire protection personnel and specialized fire protection equipment. It is estimated that an additional 4 to 5 personnel would be needed. Also, a fire station capable of housing a ladder truck would have to be built, and either the ladder truck or a snorkel truck would have to be provided. The developer would be responsible for providing the funding to build the fire station and equip it. On-going costs associated with the station would be met by the County, or possibly by an assessment district covering the site. The cost of constructing and equipping the fire station would be about \$450,000. The ladder truck would cost about an additional \$210,000. The annual staffing cost for 5 paid personnel (one captain, two engineers, and two firemen) would be about \$450,000. Maintenance of the fire station would cost about \$50,000 annually. However, due to the proximity of the site to the Edgemont station, the County may shut down the Edgemont station and transfer its equipment to a new station on the site.

MATRIX  
FINAL ENVIRONMENTAL IMPACT REPORT NO. 164  
ZONE CHANGE NO. 3475, SPECIFIC PLAN NO. 174

| ISSUE               | IMPACT                                                                                                                                                                                                                                                                                                                                                                                        | MITIGATION OR OVERRIDING FINDINGS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Circulation         | Project would generate 72,140 vehicle trips per day. Traffic would heavily impact Day Street, Eucalyptus Avenue, I-15E, and Cal. 60. More distant roads impacted, also.                                                                                                                                                                                                                       | Road improvements would be provided in connection with eventual site development. Improvements would include: a freeway interchange at I-15E/Eucalyptus, traffic signals at as many as 14 locations, widening of Day and Eucalyptus including rights-of-way acquisition, extra lanes, left and right turn pockets, curbs, gutters, and sidewalks. Also, additional improvements may be needed to I-15E and Cal. 60 as determined by CALTRANS. Developer would finance part or all of improvements, generally depending on his share of impacts to roads. Bus service, park 'n ride site, etc. can be incorporated into site to reduce auto travel. Mitigation available for most road impacts. |
|                     | Mixing of periodically heavy raceway traffic and project traffic would result in severe traffic problem.                                                                                                                                                                                                                                                                                      | Right-of-way may need to be acquired in front of residences along Eucalyptus to accommodate widening of street. Circulation Element amendments needed to upgrade status of both Day and Eucalyptus. Timing of improvements to I-15E expected to lag behind completion of shopping center. Overriding finding needed since viability of mitigation not adequately known.<br><br>Can be partly mitigated by using raceway ingress and egress traffic control plans similar to those used today. Egress plan would temporarily restrict ingress and egress from site.                                                                                                                             |
| Noise               | Construction equipment would impact residences and school along Eucalyptus Avenue in short run.<br><br>Traffic from project will permanently increase noise to residences and school on Eucalyptus and residences on Day Street. Some residences on Day Street may be impacted by noise greater than 65 dB. Traffic inside project may impact residences and school on Eucalyptus with noise. | Can be partly mitigated by prohibiting construction equipment from using Eucalyptus easterly of main project access point.<br><br>Generally not mitigable. However, noise emanating from parking lots, interior drives, etc. within project site can be mitigated by use of distance and physical buffers or barriers.                                                                                                                                                                                                                                                                                                                                                                         |
| Wastewater Disposal | Project would generate 800,000 gallons per day of sewage. Would require transmission and treatment facilities in Edgemont Community Services District.                                                                                                                                                                                                                                        | Mitigation: Developer would buy temporary capacity in currently planned Edgemont Community Services District plant to support early project stages. As site development progresses, developer would have to finance construction of new treatment plant unit. Developer would finance sewer pipe from site to treatment plant.                                                                                                                                                                                                                                                                                                                                                                 |
| Water Supply        | Project would demand 978,820 gallons per day of water, including 178,820 gallons for landscaping. Off-site water transmission facilities may need to be upsized.                                                                                                                                                                                                                              | Mitigation: Water demand can be lessened by incorporating conservation features into plumbing. Also, native drought-resistant vegetation should be planted. Developer would finance any water system upsizing needed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

**MATRIX  
(Cont)**

| ISSUE                | IMPACT                                                                                                                                                                                                                                                                     | MITIGATION OR OVERRIDING FINDINGS                                                                                                                                                                                                                                                                          |
|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Police Protection    | Project would result in increased crime and accidents in area.                                                                                                                                                                                                             | County would rely on tax revenue from project to defray cost of providing police protection. Crime and accidents can be lessened by incorporating into project street lights, traffic-slowing designs, high grade security hardware, and high building visibility.                                         |
| Solid Waste Disposal | Project would generate 31 tons of waste per day; would affect Mead Valley and/or Badlands disposal sites.                                                                                                                                                                  | Partial mitigation available by recovering reusable materials. Ongoing mitigation by County through development of new site and alternative procedures such as waste recovery, etc.                                                                                                                        |
| Hydrology            | Pavement and buildings on site will increase runoff could impact existing drainage facilities.                                                                                                                                                                             | Can be mitigated by construction of a variety of flood control facilities on site, financed by developer.                                                                                                                                                                                                  |
| Air Quality          | There would be short-term dust and construction equipment emissions pollution and long-term pollution due to motor vehicles, burning of natural gas, and off-site electricity generation. Local levels of some pollutants would be above SCAG 2% significant impact level. | Short-term impacts can be partly mitigated via dust control measures. Long-term impacts can be partly mitigated with use of solar access designs and solar heating systems, and by providing park 'n ride facilities and public transportation. Regional air pollution mitigated by SCAG Air Quality Plan. |
| Energy Conservation  | Project would consume large amounts of gasoline, electricity, and natural gas.                                                                                                                                                                                             | Impact can be partly mitigated by incorporating energy-efficient and solar-assisted design features into site buildings. Gasoline impacts can be reduced by providing bus service, park 'n ride site, etc.                                                                                                 |
| Visual Environment   | Rolling, grassy site would be transformed into mass of buildings and parking lots, possibly obstructing views and creating unattractive street frontages.                                                                                                                  | Can be mitigated by sizing and orienting buildings to preserve views and eliminate monotonous appearance, and by applying landscaping, building facades, signs, etc. in a harmonious, attractive manner.                                                                                                   |
| Housing Availability | Six thousand, six hundred and twenty seven new jobs created for low and moderate income levels. Availability of affordable housing nearby questionable.                                                                                                                    | Implement programs outlined in County's Housing Element, including "R-6 Zone".                                                                                                                                                                                                                             |
| Fire Protection      | Project will generate need for new, specialized fire station and equipment and additional fire protection personnel.                                                                                                                                                       | Developer would have to finance construction of fire station and provision of fire fighting equipment. County Fire Department would expect to rely on tax revenue from project to defray cost of providing fire protection.                                                                                |

RECEIVED  
APR 23 1982

Memorandum

RIVERSIDE COUNTY  
PLANNING COMMISSION

To : Steve Williamson  
STATE CLEARINGHOUSE  
1400 Tenth Street, Room 121

Date : April 21, 1982

Subject: "The Springs"  
Specific Plan 174  
SCH #S1091709

From : ENVIRONMENTAL HEALTH DIVISION

The Office of Noise Control has reviewed the subject Draft Environmental Impact Report and offers the following comments:

We agree that given the noise levels from March Air Force Base, commercial/industrial development is a reasonable use for the land.

One issue which seems not to be addressed in sufficient detail is the potential impact of the 105-acre industrial area in the southeastern corner of the site. Truck traffic to and from this area may impact upon the residences and the school on Eucalyptus and, perhaps, residential areas along Day south of Eucalyptus. Although the type of industry is restricted (page 27), it is not clear whether the percentage ("present" sic) of trucks shown in Table 4 (page 61) includes the industrial truck traffic. For example, Table 14 (page 115) shows the total number of trips generated by the various planning areas, but it does not show the percentage of truck traffic by area. Thus, one is unsure of how the percentage of truck traffic shown in Table 4 was derived.

If you have any questions, please contact Dr. Jerome S. Lukas, Office of Noise Control, 2151 Berkeley Way, Berkeley, CA 94704, 415/840-2665.

Harvey F. Collins, Ph.D.  
Deputy Director

bcc: Mr. Jerry Jolliffe ✓  
RIVERSIDE COUNTY PLANNING DEPT.



EDMUND G. BROWN JR.  
GOVERNOR

# State of California

GOVERNOR'S OFFICE  
OFFICE OF PLANNING AND RESEARCH  
1400 TENTH STREET  
SACRAMENTO 95814  
(916/445-0613)

RECEIVED  
APR 23 1982  
RIVERSIDE COUNTY  
PLANNING COMMISSION

April 20, 1982

Mr. Jerry Jolliffe, Associate Planner  
Riverside County Planning Department  
4080 Lemon Street, 9th Floor  
Riverside, CA 92501

SUBJECT: SCH# 81081709 - "THE SPRINGS" REGIONAL SHOPPING CENTER / EIR

Dear Mr. Jolliffe:

State agencies have completed their review of the draft Environmental Impact Report (EIR) prepared for "The Springs". Highlights of state agency comments are given below, followed by comments from the State Clearinghouse. If you wish to discuss the concerns and recommendations contained in the full text of the comments (attached), please contact the appropriate agency's staff.

## SANTA ANA REGIONAL WATER QUALITY CONTROL BOARD

The Board agrees generally with the findings of the EIR; however, they are concerned that even an expanded Edgemont wastewater treatment plant would not be sufficient to handle the projected volume of 800,000 gallons per day from this development.

## DEPARTMENT OF WATER RESOURCES

Recommendations related to water conservation and flood damage prevention are submitted by DWR, along with the request that consideration be given to a comprehensive program to use reclaimed water for irrigation purposes.

## CALTRANS DISTRICT 08

The EIR for this project was prepared well in advance of the required time allowed for review of the [second] Notice of Preparation, received by Caltrans on February 18, 1982, and therefore does not include their comments, dated March 4, 1982 (copy attached), or your responses to those comments. Those earlier comments included requests for consideration of mitigation measures, such as carpooling/vanpooling, areas for park and ride facilities, and accommodations for both pedestrians and bicycles, and for data on costs related to any transportation improvements, potential for funding, and sources of funds.

Regarding discussion of an interchange at either Alessandro Boulevard or Eucalyptus Avenue, the last paragraph on page 124 should indicate that Caltrans has not yet determined whether to construct an interchange or an overcrossing at Interstate 15E (State Route 194) and Eucalyptus Avenue.

The EIR should include a traffic capacity analysis in order to evaluate the impacts of project-generated traffic on affected state facilities, especially at: 1) Alessandro Boulevard/I-15E intersection; 2) Eucalyptus Avenue/I-15E intersection; 3) Day Street Interchange on Route 60; 4) Section of I-15E between east and west junctions of I-15E and Route 60.

The report does not specify how far Node 20 will be from the proposed interchange in order to avoid conflicts with the freeway ramps. Signalization will be required at Day Street and Route 60 and Eucalyptus Avenue and Route 60 on both ramps. ~~The Day Street/Route 60 Interchange may require redesigning.~~

An encroachment permit must be obtained for any work within the state highway right of way, and Caltrans may require certain mitigation measures as a condition for permit issuance.

#### STATE CLEARINGHOUSE

When preparing the final EIR, you must include all comments and responses (CEQA Guidelines, Section 15146). The certified EIR must be considered in the decision-making process for the project. In addition, we urge you to respond directly to the agencies' comments by writing to them, including the State Clearinghouse number on all correspondence.

A recent Appellate Court decision in Cleary v. County of Stanislaus clarified requirements for responding to review comments. Specifically, the court indicated that comments must be addressed in detail, giving reasons why the specific comments and suggestions were not accepted and factors of overriding importance warrant an override of the suggestion. Responses to comments must not be conclusory statements but must be supported by empirical or experimental data, scientific authority or explanatory information. The court further said that the responses must be a good faith, reasoned analysis.

Section 15002 (f) of the CEQA Guidelines requires that a governmental agency take certain actions if an EIR shows substantial adverse environmental impacts could result from a project. These actions include changing the project, imposing conditions on the project, adopting plans or ordinances to avoid the problem, selecting an alternative to the project, or disapproving the project. In the event that the project is approved without adequate mitigation of significant effects, the lead agency must make written findings for each significant effect (Section 15088) and it must support its actions with a written statement of overriding considerations for each unmitigated significant effect (Section 15089).

If the project requires discretionary approval from any state agency, the Notice of Determination must be filed with the Secretary for Resources, as well as with the County Clerk.

Mr. Jerry Jolliffe

-3-

April 20, 1982

Please contact Norma Wood at (916) 445-0613 if you have any questions.

Sincerely,

  
Stephen Williamson  
State Clearinghouse

  
Norma Wood  
State Clearinghouse

Attachments

cc: Ken Fellows, DWR

---

# Memorandum

To : James Burns  
Department of Water Resources  
Resource Evaluation Office  
1416 - 9th Street, Room 2154  
Sacramento, CA 95814

Date: March 17, 1982

From : California Regional Water Quality Control Board—Santa Ana Region  
6809 INDIANA AVENUE, SUITE 200, RIVERSIDE, CA 92506

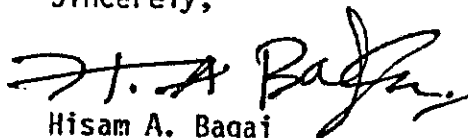
Subject: DEIR for The Springs Regional Shopping Center and Industrial Park

SCH 81081707

We have reviewed the draft EIR for the subject project. We generally agree with the findings of the EIR. We are concerned, however, that even after Edgemont Community Services District wastewater treatment plant is expanded, the design capacity would not be sufficient to handle the projected volume (800,000 gallons per day) from the development. If the projected volume figures are correct, then how is the volume of wastes proposed to be handled? If a new treatment plant is constructed, waste discharge requirements from this Board will be necessary.

Please contact us if there are any questions.

Sincerely,



Hisam A. Baqai  
Senior WRC Engineer

HAB/ps

# Memorandum

To : Mr. Steve Williamson  
Executive Officer  
State Clearinghouse  
1400 10th Street  
Sacramento, CA 95814

Date: April 9, 1982

File :

08-Riv-15E(194)-37.438/38.339  
60-R12.212/13.307  
SCH #81081709

From : DEPARTMENT OF TRANSPORTATION  
District 08

Subject: DEIR for "The Springs" - Edgemont

We have reviewed the above-referenced document and request consideration of the following:

It seems that the Draft Environmental Impact Report (DEIR) for this project (dated March 1982) was prepared well in advance of the required time allowed for review of the Notice of Preparation (NOP). We received the NOP for this project on February 18, 1982. Under the California Environmental Quality Act (CEQA), 45 days from the date of receipt are prescribed for review of an NOP. Had this procedure been followed, the review period would have ended no earlier than April 4, 1982; therefore, the DEIR does not include our comments or the document preparers' responses to them as it should.

In our comments on the NOP, we indicated that mitigation measures for the impacts to the transportation system should also consider the use of carpooling/vanpooling, the reservation of areas for park and ride facilities, and accommodations for both pedestrians and bicycles. These possibilities were not examined in the report. It would also be appropriate to consider the use of "flex-time" for the industrial development proposed. Costs related to any transportation improvements, potential for funding, and sources of funds should also be discussed.

On page 112 (last paragraph), the report indicates that an interchange has been proposed at either Alessandro Boulevard or Eucalyptus Avenue. While an interchange is proposed at Alessandro Boulevard, it has not been determined whether an interchange or an overpass will be constructed at Eucalyptus Avenue. In this regard, the last paragraph on page 124 should indicate that Caltrans has not yet determined whether to construct an interchange or overcrossing at Interstate 15E (State Route 194) and Eucalyptus Avenue.

Mr. Steve Williamson  
Page 2  
April 9, 1982

References to Caltrans District 07 (page 114) should be corrected to Caltrans District 08. Also on the same page, the second paragraph should state that an environmental document will be submitted in June of 1983 - rather than a public hearing - and final environmental approval will be in July of 1983.

The report should include a traffic capacity analysis in order to evaluate the impacts of project-generated traffic on affected state facilities, especially at the following locations:

- Alessandro Boulevard intersection on I-15E
- Eucalyptus Avenue intersection on I-15E
  - (a) before the freeway is built  
(assuming a stoplight is installed)
  - (b) after the freeway is built  
(assuming a diamond interchange is built)
- Day Street Interchange on Route 60
- Section of I-15E between east and west junctions of I-15E and Route 60.

The report does not specify how far Node 20 (main feeder into the development from Eucalyptus) will be from the proposed interchange in order to avoid conflicts with the freeway ramps. Care must be taken as more specific plans are considered.

Signalization will be required at Day Street and Route 60 and Eucalyptus Avenue and Route 60 on both ramps. It should be noted that the Day Street/Route 60 Interchange may require redesigning in order to accommodate projected peak demand.

An encroachment permit must be obtained for any work within the state highway right of way. Caltrans, as a responsible agency, may require certain mitigation measures as a condition for permit issuance. We urge early and continuous liaison with Caltrans on proposed plans as they affect state highways.

We would like a copy of the final document as soon as it is available.

Mr. Steve Williamson

Page 3

April 9, 1982

If you have any questions, please contact Steven Keel at (714) 383-4550.

*Guy Viscial. for*  
C. Pote

R. G. POTE  
Chief, Transportation Planning

SLK:ob  
cc: DHusum, DOTP  
    WBailey  
    RLongstreet  
    File

# Memorandum

To : 1. James W. Burns  
Assistant Secretary for Resources  
2. County of Riverside  
Planning Department  
4080 Lemon Street, 9th Floor  
Riverside, CA 92501

Attention: Mr. Jerry Jolliffe

Date : MAR 17 1982

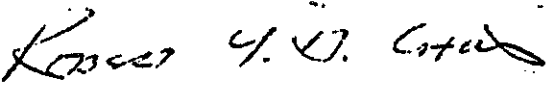
File No.:

Subject: The Springs--Regional  
Shopping Center & Industrial  
Park/Edgemont/311 Acres/  
SP174 SCH 81081709

From : Department of Water Resources  
Los Angeles, CA 90055

The Department of Water Resources' recommendations related to water conservation and flood damage prevention on the subject document are attached.

Consideration should also be given to a comprehensive program to use reclaimed water for irrigation purposes in order to free fresh water supplies for beneficial uses requiring high quality water.

  
Robert Y. D. Chun, Chief  
Planning Branch  
Southern District  
(213) 620-4135

Attachments

To reduce water demand, the following water conservation measures should be implemented:

Required by law:

1. Low-flush toilets (see Section 17921.3 of the Health and Safety Code).
2. Low-flow showers and faucets (California Administrative Code, Title 24, Part 6, Article 1, T20-1406F).
3. Insulation of hot water lines in water recirculating systems (California Energy Commission regulations).

Recommend be implemented where applicable:

Interior:

1. Supply line pressure: recommend water pressure greater than 50 pounds per square inch (psi) be reduced to 50 psi or less by means of a pressure reducing valve.
2. Flush valve operated water closets: recommend 3 gallons per flush.
3. Drinking fountains: recommend equipped with self-closing valves.
4. Pipe insulation: recommend all hot water lines in dwelling be insulated to provide hot water faster with less water waste, and to keep hot pipes from heating cold water pipes.
5. Hotel rooms: recommend posting conservation reminders in rooms and rest rooms\*. Recommend thermostatically-controlled mixing valve for bath/shower.
6. Laundry facilities: recommend use of water-conserving models of washers.
7. Restaurants: recommend use of water-conserving models of dishwashers or retrofitting spray emitters. Recommend serving drinking water upon request only\*.

Exterior:

1. Landscape with low water-consuming plants wherever feasible.
2. Minimize use of lawn by limiting it to lawn dependent uses, such as playing fields.
3. Use mulch extensively in all landscaped areas. Mulch applied on top of soil will improve the water-holding capacity of the soil by reducing evaporation and soil compaction.

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\*The Department of Water Resources or local water district may aid in developing these materials.

4. Preserve and protect existing trees and shrubs. Established plants are often adapted to low water conditions and their use saves water needed to establish replacement vegetation.
5. Install efficient irrigation systems which minimize runoff and evaporation and maximize the water which will reach the plant roots. Drip irrigation, soil moisture sensors and automatic irrigation systems are a few methods of increasing irrigation efficiency.
6. Use pervious paving material whenever feasible to reduce surface water runoff and aid in ground water recharge.
7. Grading of slopes should minimize surface water runoff.
8. Investigate the feasibility of utilizing reclaimed waste water, stored rainwater, or household gray water for irrigation.
9. ~~Encourage cluster development which can reduce the amount of land being converted to urban use. This will reduce the amount of impervious paving created and thereby aid in ground water recharge.~~
10. Preserve existing natural drainage areas and encourage the incorporation of natural drainage systems in new developments. This would aid in ground water recharge.
11. Flood plains and aquifer recharge areas which are the best sites for ground water recharge should be preserved as open space.

In flood-prone areas, flood damage prevention measures required to protect a proposed development should be based on the following guidelines:

1. All building structures should be protected against a 100-year flood.  
It is the State's policy to conserve water. Any potential loss to ground water should be mitigated.
2. In those areas not covered by a Flood Insurance Rate Map or a Flood Boundary and Floodway Map, issued by the Federal Emergency Management Agency, the 100-year flood elevation and boundary should be shown on the Environmental Impact Report.
3. At least one route of ingress and egress to the development should be available during a 100-year flood.
4. The slope and foundation designs for all structures should be based on detailed soils and engineering studies, especially for hillside developments.
5. Revegetation of the slopes should be done as soon as possible.
6. The potential damage to the proposed development by mudflow should be assessed and mitigated as required.
7. Grading should be limited to dry months to minimize problems associated with sediment transport during construction.

# Eastern Municipal Water District

MAR 23 1982

**General Manager**

Donald C. Stewart

**Chief Engineer and Deputy General Manager**

James H. Bunts, Jr.

**Legal Counsel**

Redwine and Sherrill

**Director of The Metropolitan Water**

**District of Southern California**

Irwin E. Farrar



March 22, 1982

**RIVERSIDE COUNTY**

**Board of Directors**

Chester C. Gilbert, President

Wm. G. Aldridge, Vice President

John M. Coudures

Richard C. Kelley

James Simpson

**Secretary**

Louise C. Koettters

**Treasurer**

Rogers M. Cox

RE: Specific Plan No. 174  
Draft EIR for The Springs  
Regional Shopping Center and  
Industrial Park

Mr. Jerry Jolliffe  
Regional Team No. 1.  
Riverside County Planning Department  
4080 Lemon Street, 9th Floor  
Riverside, California 92501

Dear Mr. Jolliffe:

We have reviewed Specific Plan No. 174 and the Draft Environment Impact Report for The Springs Regional Shopping Center and Industrial Park and have the following comments:

REGARDING WATER SERVICE:

The Springs project lies within the boundaries of Improvement District No. 10 of the Eastern Municipal Water District and as such, is eligible for water service from the District. Based on the proposed project's estimated water requirement of 978,820 gallons per day and anticipated high water flow requirements for fire protection, modifications to and enlargements of existing District water supply facilities will probably be required to guarantee an adequate volume of water to the project area.

REGARDING SEWER SERVICE:

The Springs lies within the boundaries of the Edgemont Community Services District and within the general boundaries of the Eastern Municipal Water District. Eastern Municipal Water District has been notified by Edgemont Community Services District's Engineer, Albert A. Webb Associates, that the Edgemont Community Services District will provide the sewage collection, treatment and disposal services for the proposed development.

Should this position change and, at the specific formal request of the Edgemont Community Services District, Eastern Municipal Water District could provide sewer services to the project area. To accomplish this, a sewage pump station at the southwest corner of The Springs development and approximately two (2) miles of off-site sewage force main pipeline would be required to lift and transport the area's sewage to existing District sewer pipelines in Frederick Street.

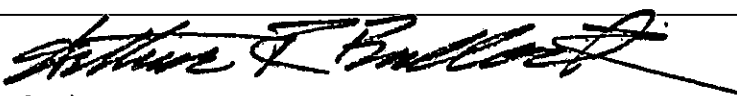
Mr. Jerry Jolliff, Regional Team No. 1  
Riverside County Planning Department  
Specific Plan No. 174 & Draft EIR - The Springs  
March 22, 1982 - Page two

Should you require more information or have any questions regarding the above comments, please contact me.

Very truly yours,

EASTERN MUNICIPAL WATER DISTRICT

---



By: Arthur R. Bullock  
Director of Planning

ARB:abo

**ALBERT A. WEBB ASSOCIATES**  
CONSULTING ENGINEERS  
3788 McCRAY STREET, RIVERSIDE, CALIFORNIA 92506-2973  
TELEPHONE (714) 686-1070

April 8, 1982

ALBERT A. WEBB — (1999-1981)

REF. W.O. 78-117

A. HUBERT WEBB  
ERNEST N. WEBB  
JOHN H. STAAR  
SAM I. GERSHON  
REG KNAGGS

FRED HANS HANSON  
RODNEY D. CRAMPTON  
DAVID M. ALGRANTI  
WALLACE H. FRANZ  
MICHAEL CALL

FILE NO. 1224.46

Mr. Jerry Jolliffe  
Regional Team No. 1  
Riverside County Planning Department  
County Administrative Center, 9th Floor  
4080 Lemon Street  
Riverside, CA. 92501

Subject: Specific Plan No. 174  
"The Springs Regional  
Shopping Center,  
Industrial Rezoning"  
and EIR No. 168

Dear Mr. Jolliffe:

Pursuant to your request, we have reviewed the subject Specific Plan and EIR on behalf of Edgemont Community Services District (ECSD).

✓ Since our area of concern is with regard to sewerage service, the water and sewer plan outlined on Pages 43-45 of the Specific Plan were reviewed. We believe the last paragraph on Pages 44 and 45 are erroneous, hence need to be revised. It appears that our January 18, 1982 letter (copy enclosed) was disregarded when the Specific Plan was prepared.

It is indicated by the project proponent that two options have been identified to sewer the proposed development. One is service from Edgemont Community Services District and the other is Eastern Municipal Water District. It is stated that "Secondly, the Eastern Municipal Water District (EMWD) (sic) has indicated that THE SPRINGS falls within their district for water services and that the capacity to accept effluent (sic) from THE SPRINGS project is either available or planned at the Eastern treatment plant in the Sunnymead area. Agreement could be arranged to shift the sewage treatment responsibility from ECSD to EMWD".

Since the project site is within Edgemont Community Services District, the District will not agree to shifting the sewage treatment responsibility to EMWD. The District does not believe that sewage treatment plant capacity is either available or planned at EMWD's Sunnymead plant for a project which is within another

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APR 9 1982

RIVERSIDE COUNTY  
PLANNING COMMISSION

Page 2  
Mr. Jerry Jolliffe  
April 8, 1982

public district service area. Edgemont Community Services District is willing to provide sewerage service to the proposed project if the project proponents arrange a financing program acceptable to the Board of Directors.

The project proponent indicated in the Specific Plan that the advantages of shifting sewage treatment responsibility from ECSD to EMWD are as follows:

"1. EMWD currently has capacity to treat effluent (sic) generated by THE SPRINGS; ECSD does not have capacity at this time.

2. Either proposal involves the extension of adequate sewer trunk lines while both alternatives appear to allow a gravity flow system, extending lines to the ECSD plant would involve extensive tunneling under I-15E and the A.T. and S.F. Railroad lines; such tunneling would not be required for line extensions to the EMWD system."

The EMWD Sunnymead plant is presently treating about 2 MGD. The plant has just been expanded to 3 MGD. However, EMWD has extended sewerage services to Improvement District U-13 which at full development could utilize this excess treatment capacity. With regard to the second comment, the Specific Plan indicated that the proposed project can be served by a gravity system. Actually, the project can only be served by a gravity sewerage system by ECSD. If the project were served by EMWD, the sewerage effluent would have to be pumped.

The Specific Plan indicated that if ECSD provided sewerage service, "extensive tunneling under I-15E and AT&SF lines" would be required. If EMWD provided service, such "tunneling would not be required for line extensions..." For ECSD to serve the proposed project, I-15E and the railroad will have to be bored and not tunneled. However, if EMWD were to serve the project, Alessandro Boulevard would have to be crossed. This street would have to be bored rather than open cut.

To convey wastewater from the project to ECSD will require about 5700 feet of pipe. If EMWD were chosen, about 38,000 feet of pipe would have to be laid to reach the Sunnymead Plant, in addition to a pumping plant.

If you have any questions, please call.

Sincerely yours,

ALBERT A. WEBB ASSOCIATES

*Loretta Gershon*  
for Sam I. Gershon  
Vice President

SIG:lm  
Enc.

cc: Virginia Lou Rahn,  
ECSD

ALBERT A. WEBB ASSOCIATES

CONSULTING ENGINEERS

3788 McCRA Y STREET, RIVERSIDE, CALIFORNIA 92506

TELEPHONE (714) 686-1070

ALBERT A. WEBB  
A. HUBERT WEBB  
ERNEST N. WEBB  
JOHN H. STAAB  
SAM I. GERSHON  
HELI KNATIGS

ANTHONY J. KENNEDY  
FRED HANS HANSON  
RODNEY D. CRAMPTON  
DAVID M. ALGRANTI  
WALLACE H. FRANZ  
MICHAEL CALL

January 18, 1982

REF. W.O. 73-117

FILE NO. 1224.46

Mr. Gene Anderson  
Project Manager  
Environmental Studies Division  
Ultra Systems, Inc.  
P. O. Box 19605  
Irvine, CA. 92715

Subject: Regional Shopping Center  
and Industrial Park  
Highway 60 and I-15E

Dear Mr. Anderson:

Pursuant to Edgemont Community Services District's request, we have prepared the following response to your letter of December 23, 1981.

Enclosed are data from the District's Project Report\* that you may incorporate into the "Setting" section of the proposed EIR. With regard to the status of the District's Clean Water Grant Program, the District is awaiting funding for the design and construction of the proposed treatment facilities. The proposed expansion of the facilities is for residential growth anticipated over the next 10 or 15 years.

Based on the data provided in your letter, we anticipate 800,000 gallons per day of sewerage flow from the proposed project. During peak periods, this would equate to 4.6 cubic feet per second. The existing sewerage system is not capable of handling the anticipated flow. Hence, we have calculated that an 18-inch diameter pipe is needed from the intersection of Eucalyptus and Clark Street to the treatment plant. The estimated project cost of this line, including manholes and repaving is \$570,000. In addition, we expect the bore underneath I-15E and the railroad at Eucalyptus will cost \$120,000. Since the proposed project will be built in stages, it may be possible to stage the proposed trunk system if available interim capacity is available in the existing trunk sewers.

\*"Draft Project Report for Wastewater Management Facilities" October 1980.

Page 2  
Mr. Gene Anderson  
January 18, 1982

The existing treatment plant is not capable of taking any significant increase in effluent. Therefore, the project proponent will have to finance the construction of additional treatment facilities. The estimated project cost of treatment facilities varies from \$3 to \$4.50 per gallon.

We believe the project proponent could mitigate the impact the project will have on the Edgemont Community Services District by arranging a financing program, acceptable to the Board of Directors, for the proposed sewerage improvements.

Sincerely yours,

ALBERT A. WEBB ASSOCIATES



Sam I. Gershon  
Vice President

SIG:lm  
Enc.



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MAR 17 1982

RIVERSIDE COUNTY  
PLANNING COMMISSION

# The Metropolitan Water District of Southern California

Office of the General Manager

MAR 17 1982

Mr. Jerry Jolliffe  
Regional Team No. 1  
Riverside County  
Planning Department  
4080 Lemon Street, 9th floor  
Riverside, California 92501

Dear Mr. Jolliffe:

The Springs Commercial Specific Plan No. 174  
and The Springs Regional Shopping Center and  
Industrial Park - Draft EIR No. 168

Thank you for your letter, dated March 5, 1982,  
transmitting a copy of Specific Plan No. 174 and a copy of Draft  
EIR No. 168 for our review and comment.

Metropolitan has reviewed the documents, and has no  
comments to make other than a reminder that we have an 80-foot-  
wide permanent right-of-way (fee) for our 96-inch-inside-diameter  
Box Springs Feeder pipeline within the project area. Project  
implementation will require an easement to use our right-of-way.  
At that time Metropolitan would become a responsible agency under  
CEQA and would thus be required to review and certify the final  
project Specific Plan and Final EIR prior to our participation  
in the project. Therefore, we would like to request that you  
send us the Final Specific Plan No. 174 and Final EIR No. 168  
when they are available.

Thank you for the opportunity to review these documents.  
We appreciate your cooperation in keeping us informed of your  
development activities. If you have any questions, please  
contact me at (213) 626-4282, extension 455.

Very truly yours,

Glen W. Smith  
Principal Engineer  
Environmental Planning Branch

DAM/rg

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MAR 17 1982

RIVERSIDE COUNTY  
PLANNING COMMISSION



Pacific Telephone  
3073 Adams Street, Room 2  
Riverside, California 92

March 16, 1982

County of Riverside  
Planning Department  
4080 Lemon Street, 9th Floor  
Riverside, California 92501

Attention: Jerry Jolliffe, Regional Team No. 1

Re: EIR No. 168, "The Springs"

Dear Mr. Jolliffe:

The Draft Environmental Impact Report paragraph 3.13.3.1 refers to telephone service being provided by both Pacific Telephone and General Telephone, and the approximate amount of area to be served by each Company.

The one fourth, three fourth ratio appears to be in error. The boundary line between the two companies is currently located 1320 feet south of Lawless Road. Unless this line is relocated, General Telephone will serve all but a few building sites that abut Highway 60.

Telephone service to the commercial area outlined on the Specific Plan Document that are adjacent to Highway 60, will require a line extension from the Riverside Exchange Base Rate Area. The developer will be required to pay for this extension in accordance with applicable tariffs.

We have no further comments to make about the Draft Environmental Impact Report or Specific Plan Document.

I will be the contact person for this agency. My phone number is (714)359-2500.

Very truly yours,

  
W. R. Inman  
Manager

WRI:lmw

cc: F. A. Koehler

CITY OF

*Riverside*

CITY HALL • 3900 Main Street • Riverside, California 92522 • 714/787-7552

May 7, 1982

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MAY 7 1982

Office of the City Manager

Ms. Patricia Nemeth  
Planning Director  
County of Riverside  
4080 Lemon Street  
Riverside, CA 92501

RIVERSIDE COUNTY  
PLANNING COMMISSION

Attention: Mr. Jerry Jolliffe

Subject: Draft EIR - "The Springs"

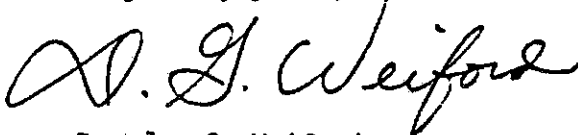
Dear Ms. Nemeth:

At its meeting of May 4, 1982, the Riverside City Council received the Draft EIR for "The Springs", a proposed 311 acre regional shopping center and industrial park located adjacent to the City of Riverside and generally bounded by State Route 60 on the north, Day Street on the east, Eucalyptus Avenue on the south and I-15E on the west.

At that time, and by unanimous vote, the City Council recommended that the final EIR on this project should: (1) contain an expanded analysis of the effects of this project on traffic circulation along City streets, including Central and Pennsylvania Avenues, Alessandro Boulevard and Box Springs Boulevard; (2) more clearly define the expected impacts of this project on future retail sales growth of existing commercial development, particularly at Tyler Mall and the Riverside Plaza; (3) elaborate on the cumulative impact of this project on solid waste disposal in the area; and (d) address the off-site impacts of this project on wildlife in a cumulative fashion.

Should you have any questions regarding this matter, please call Stephen J. Whyld, Principal Planner, at 787-7371.

Very truly yours,



Douglas G. Weiford  
City Manager

DGW/1/M14/Qb

cc: Merle G. Gardner, Planning Director  
Jay Self, T&S Development

# County of Riverside

DEPARTMENT OF BUILDING AND SAFETY

**TO:** Pat Nemeth, Planning Director **DATE:** March 12, 1982  
Attn: Jerry Jolliffe, Associate Planner  
**FROM:** Leopoldo Rojo, Jr., Director *LR*  
**RE:** E.I.R. No. 168 and Specific Plan No. 174

We have reviewed the subject document and have no comments at this time.

We would appreciate a copy of the conditions of approval, when finalized, at the earliest possible date.

/bc

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MAR 17 1982

**RIVERSIDE COUNTY  
PLANNING COMMISSION**

# County of Riverside

**TO:** Jerry Jolliffe, Regional Team 1 **DATE:** March 16, 1982  
Planning Department

**FROM:** Eric A. Traboulay, Jr., Associate Civil Engineer *Eric*

**RE:** The proposed 350 acre Box Springs Canyon Business/Industrial Park by T&S Development

This department has reviewed the feasibility soils investigation prepared by John Byerly, Incorporated and the associated environmental documents on the above mentioned project. The reports are well written and are consistent with the policies of this department and Ordinance 457.57.

cc: Leo Rojo, Building Director  
Ron Espalin, Assistant Building Director

COUNTY OF RIVERSIDE  
REFERRAL-MEMO SLIP

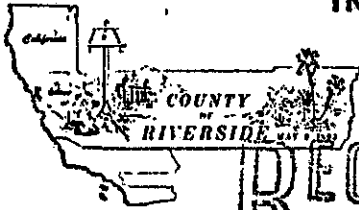
Date 3-30-82

To: Planning Dept.  
From: Aviation Dept.  
Subject: Attached reports.

|                          |  |
|--------------------------|--|
| YOUR APPROVAL            |  |
| YOUR SIGNATURE           |  |
| YOUR ACTION              |  |
| YOUR ACTION AND REPORT   |  |
| RUSH                     |  |
| YOUR COMMENTS            |  |
| PLEASE VERIFY            |  |
| FOR YOUR INFORMATION     |  |
| PLEASE RETURN ENCLOSURES |  |
| PLEASE CALL              |  |
| PLEASE HANDLE            |  |
| APPROVE AND RETURN       |  |
| APPROVE AND PASS TO      |  |
| NOTE AND FILE            |  |
| NOTE AND PASS TO         |  |
| NOTE AND RETURN          |  |
| NOTE AND MAIL ORIGINAL   |  |
| NOTE AND DESTROY         |  |
| SEE ME PROMPTLY          |  |
| SEE ME WHEN CONVENIENT   |  |
| SEE ME AT                |  |

*No comment from this Dept  
Documents being returned  
for your further use.*

INTER-DEPARTMENTAL LETTER



COUNTY OF RIVERSIDE

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APR 5 1982

RIVERSIDE COUNTY  
PLANNING COMMISSION

April 2, 1982

TO : Jerry Jolliffe, Regional Team No. 1 - Planning Department  
FROM: Earl E. Tuntland, R.S., M.P.A., Administrative Supervisor - Environmental Health  
RE : EIR NO. 168 and SPECIFIC PLAN NO. 174, ALSO KNOWN AS "THE SPRINGS"

The above documents have adequately covered our areas of concern namely solid waste, noise, water, and sewage disposal. The documents indicate that sewer service can be provided by either the Eastern Municipal Water District or the Edgemont Community Services District. Further negotiations between the developers and the two agencies above, will be needed to determine the best agency to provide sewer service. It appears that adequate water currently exists to serve the projects needs.

If you have any questions about our comments, please contact me at 787-6543.

EET:cg

## ENVIRONMENTAL IMPACT REPORT

1. Adequacy of Draft EIR: *THE DRAFT EIR ADDRESSES FIRE DEPT. PROBLEMS, THE MITIGATION MEASURES ARE ACCEPTABLE*
2. Appropriateness of the Project:
3. Special Conditions for Approval

*M. J. [Signature]*

*3-31-82*

## SPECIFIC PLAN DOCUMENT

1. Special Districts and Transportation Agencies: Do present facilities serve the subject property? If not, where are existing services located which have the capacity to serve the subject property? What is the required level of service for this project?
2. School Districts: Which of your schools will be affected? What is the current enrollment of each of the schools? What is the capacity of each of the schools? Will, in your opinion, capital improvements be necessary to accommodate possible growth in enrollment?
3. Review Agencies: Would the proposal if developed comply with established standards for development? If not, what will be necessary for the development to comply with established standards?
4. Local Government Agencies: What effect will the proposal have on your planning program as it relates to your spheres of influence? Would services provided within your jurisdiction have to be expanded of possible growth or use?
5. Interested Parties: What effect will the proposal have on your area of concern? What types of measures would you think necessary to mitigate any adverse affects relating to your area of concern?
6. What costs, in your opinion, will be incurred by your agency if services or capital improvements had to be expanded or construction as a direct result of the development were it to occur? Are there established methods for requiring the developer to pay for improvements to deter increased public costs?
7. What recommendations or conditions do you have for County action regarding the proposal in relation to your area of concern?

Submitted By: \_\_\_\_\_ Title: \_\_\_\_\_

Date: \_\_\_\_\_ Phone: \_\_\_\_\_

Please return original to Planning Department, County Administrative Center, 9th Floor  
2000 Lamon Road, Broomfield, Colorado 80020

KENNETH L. EDWARDS  
CHIEF ENGINEER

1995 MARKET STREET  
P. O. BOX 1033  
TELEPHONE (714) 787-2015

RECEIVED  
MAY 5 1982  
RIVERSIDE COUNTY FLOOD CONTROL AND  
WATER CONSERVATION DISTRICT  
RIVERSIDE, CALIFORNIA 92502  
May 3, 1982

RIVERSIDE COUNTY  
PLANNING COMMISSION

Riverside County  
Planning Department  
County Administrative Center  
Riverside, California

Attention: Jerry Jolliffe  
Team 1

Gentlemen:

Re: Specific Plan 174  
EIR 168

Reference is made to Specific Plan 174 and EIR 168 for a regional shopping industrial center proposed for the Sunnymead area bordered by Highways 395, 60, Day Street and Eucalyptus Avenue.

These documents recognize the offsite and onsite drainage problems associated with the proposed project. The EIR proposes specific mitigation measures that, when implemented, would provide reasonable storm protection for the site. Onsite runoff retention may be appropriate if it does not cause a hazard and if acceptable provisions for maintenance can be agreed upon.

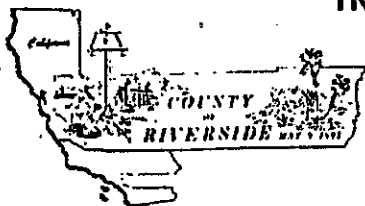
Questions regarding this matter should be directed to John Kashuba of this office at 714/787-2884.

Very truly yours,

KENNETH L. EDWARDS  
Chief Engineer

*David T. Sheldon*

DAVID T. SHELDON  
Planning Engineer



INTER-DEPARTMENTAL LETTER

COUNTY OF RIVERSIDE

Road and Survey Department

Memo To: Patricia Nemeth, Planning Director  
Attn: Jerry Jolliffe, Regional Team No. 1

April 23, 1982

From: A. E. Newcomb, Road Commissioner and County Surveyor

By: Edwin Studor, Transportation Planner *Edwin Studor*

Re: Specific Plan No. 174 and Draft EIR No. 168 (The Springs)

We have reviewed the above referenced documents and are concerned regarding the traffic impacts associated with this proposal. The traffic analysis was limited only to the project site and the immediately adjacent street network. It is our opinion that this analysis should extend southerly of the site to include Day Street, Cottonwood Avenue and Alessandro Boulevard, as these will be the primary access routes for Moreno Valley residents in the vicinity of the project. We have also noted that while the report includes a peak hour analysis of the proposed interchange at I-15E and Eucalyptus Avenue, there is no analysis of the existing interchange at Highway 60 and Day Street. This oversight should be corrected, and we would also appreciate a conceptual circulation plan for the overall project.

Based upon the information which has been made available thus far, we are in general concurrence with the proposed mitigation measures. However, the discussion of proposed improvements should be expanded to include their phasing.

We are in the process of drafting recommended conditions for approval of this project, but will require the additional information outlined above to complete this task.

ES:jn

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APR 23 1982

RIVERSIDE COUNTY  
PLANNING COMMISSION

ENVIRONMENTAL IMPACT REPORT

1. Adequacy of Draft EIR:

N/A to Parks Department

2. Appropriateness of the Project:

N/A to Parks Department

3. Special Conditions for Approval

None

SPECIFIC PLAN DOCUMENT

1. Special Districts and Transportation Agencies: Do present facilities serve the subject property? If not, where are existing services located which have the capacity to serve the subject property? What is the required level of service for this project?
2. School Districts: Which of your schools will be affected? What is the current enrollment of each of the schools? What is the capacity of each of the schools? Will, in your opinion, capital improvements be necessary to accommodate possible growth in enrollment?
3. Review Agencies: Would the proposal if developed comply with established standards for development? If not, what will be necessary for the development to comply with established standards?
4. Local Government Agencies: What effect will the proposal have on your planning program as it relates to your spheres of influence? Would services provided within your jurisdiction have to be expanded of possible growth or use?
5. Interested Parties: What effect will the proposal have on your area of concern? What types of measures would you think necessary to mitigate any adverse affects relating to your area of concern?
6. What costs, in your opinion, will be incurred by your agency if services or capital improvements had to be expanded or construction as a direct result of the development were it to occur? Are there established methods for requiring the developer to pay for improvements to deter increased public costs?
7. What recommendations or conditions do you have for County action regarding the proposal in relation to your area of concern? None

Submitted By: George Balteria

Title: Assistant Park Planner

Date: March 26, 1982

Phone: (714) 787-2551

Please return original to Planning Department, County Administrative Center, 9th Floor  
4080 Lemon Street, Riverside, California 92501

12/22/82

DO NOT WRITE  
MAR 31 1982  
RIVERSIDE COUNTY  
PLANNING COMMISSION

## ENVIRONMENTAL IMPACT REPORT

### 1. Adequacy of Draft EIR:

If Moreno incorporates Traffic services previously provided by C.H.P. would be provided by the City (Contract-Sheriff) + the costs are not mentioned in Public Safety section.

### 2. Appropriateness of the Project:

No comment

### 3. Special Conditions for Approval

## SPECIFIC PLAN DOCUMENT

1. Special Districts and Transportation Agencies: Do present facilities serve the subject property? If not, where are existing services located which have the capacity to serve the subject property? What is the required level of service for this project?

Schools: Which of your schools will be affected? What is the current enrollment of each of the schools? What is the capacity of each of the schools? In your opinion, capital improvements be necessary to accommodate possible enrollment?

Standards: Would the proposal if developed comply with established standards? If not, what will be necessary for the development to comply with standards?

Local Agencies: What effect will the proposal have on your planning policies to your spheres of influence? Would services provided within the area have to be expanded of possible growth or use?

Concerns: What effect will the proposal have on your area of concern? What measures would you think necessary to mitigate any adverse affects in your area of concern?

Costs: In your opinion, will be incurred by your agency if services or capital improvements be expanded or construction as a direct result of the development? Are there established methods for requiring the developer to pay for or to deter increased public costs?

Recommendations: What recommendations or conditions do you have for County action regarding the proposal in your area of concern?

M. Byrd

Title: Chief Deputy

Phone: 787-2408

1. To Planning Department, County Administrative Center, 9th Floor  
Riverside, California 92501

RIVERSIDE COUNTY PLANNING DEPARTMENT  
EIR/SPECIFIC PLAN TRANSMITTAL

RECEIVED  
MAR 16 1982  
RIVERSIDE COUNTY  
PLANNING COMMISSION

SHERIFF DEPT  
4050 MAIN ST  
RIV CA 92501

REGIONAL TEAM NO: 1

EIR NO: 168

SPECIFIC PLAN NO: 174

PROJECT NAME: "The Springs"

Regional Shopping Center/Industrial Rezon

TO: \_\_\_\_\_

FROM: Riverside County Planning Department:

Regional Team No. 1

Contact Person Mr. Jerry Jolliffe

Phone (714 ) 787-6457

TRANSMITTAL DATE: March 5, 1982

RETURN DATE: April 26, 1982

Should you wish to be notified of the date of public hearing, please indicate \_\_\_\_\_

The Riverside County Planning Department is currently preparing a staff report regarding a Specific Plan Application in the Edgemont/Sunnymead area. The accompanying Environmental Impact Report and Specific Plan Document are draft texts. Please review and comment on the adequacy of the texts and the appropriateness of the project itself in writing. Please direct comments and suggestions to the appropriate draft text. If comments and/or suggestions apply to both texts, please note and explain. Please describe in what capacity your agency will review or service this project. We ask that you reference the Regional Team Number in conjunction with the contact person when addressing your correspondence. (Please see the reverse side!)



riverside international raceway

22255 eucalyptus avenue, riverside, california 92508 • telephone 653-1161 (area code 714)

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APR 21 1982

April 16, 1982

RIVERSIDE COUNTY  
PLANNING COMMISSION

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Riverside County Planning Department  
Environmental Quality Section  
9th Floor--County Administrative Center  
4080 Lemon Street  
Riverside, California 92501

Attention: Jerry V. Jolliffe, Associate Planner  
Regional Team No. 1

Re: EIR No. 168 and  
Specific Plan No. 174  
"The Springs"

Gentlemen:

In response to your request dated March 5, 1982 regarding the above matter, we have reviewed the Draft Environmental Impact Report and Commercial Specific Plan submitted by your office. Our review included consultation with our land planners, Corbin/Yamafuji and Partners, Inc., Architecture/Planning, of Irvine, California, and Albert A. Webb Associates, Engineers.

1. ADEQUACY OF DRAFT EIR. We believe the Draft EIR fails to adequately address the following matters:

(a) Traffic. We believe there will be significant negative traffic impact resulting from the site plan submitted. The site plan provides a single means of freeway (Highway 60) ingress and egress via Day Street. Coupled with traffic generated by the Raceway during events, we believe the traffic burden would be unreasonable given the magnitude of the project. Access provided via Eucalyptus

Avenue is the alternate means of entering the proposed project. The Draft EIR does not resolve the impact resulting to surrounding residential properties and the Eucalyptus Avenue school that the proposed project will create when added to existing traffic generated by the Raceway and others.

(b) Access. The Draft EIR does not address the lack of suitability of the site access for the uses contemplated by the project. Although the site has high visibility, it lacks access normally associated with projects of the scope contemplated. The site plan submitted fails to solve any of these inherent conditions and limitations. There is no direct access to the proposed mall. Users must drive past the proposed mall on Highway 60 to reach the Day Street interchange and then back track through other proposed uses. I-15 traffic must exit at Eucalyptus before siting the project and enter through a residential and school area. It is our opinion the access limitations may not be mitigated through interchange at I-15 and Eucalyptus. We have long been involved in the administrative process relating to freeway status improvement and I-15E. We do not believe such an interchange is desirable or economically feasible, and we consider the present CAL TRANS interchange at Alessandro (which is already being processed) satisfactory to serve the needs of the area and incompatible with a proposed Eucalyptus interchange.

(c) Site Plan--Proposed Uses. The proposed site plan seeks to buffer existing residential and school areas along Eucalyptus with light industrial. This use is incompatible with the surrounding area and offers a significant negative effect when coupled with the proposed mall use. The Draft EIR does not adequately address this issue nor the possible future impact of the proposed uses, including light industrial, with respect to future development and existing adjacent properties east of Day Street and south of Eucalyptus.

(d) Commercial Concentration. The proposed site plan attempts to utilize approximately 342 acres in some form of commercial or industrial use. Wholesale commercial and industrial zoning of this type has the ultimate

effect of prematurely and artificially increasing and escalating land values in the area without actual user development creating the proposed demand. Respective parcels may be resold to other investors who perpetuate artificial values by holding and reselling. Residential uses are ignored when much of the site is appropriate for this use. In accordance with the County General Plan, a proposed hotel site has already been designated and rezoned at the northeast corner of Day Street and Highway 60.

(e) Availability of Utilities. It is our understanding the Edgemont Community Services District does not have sufficient capacity to serve the proposed development. The Draft EIR does not address itself to the economics, including sources of funding and impact upon present users, of those improvements necessary in order to provide adequate sewer and related services to the project.

2. APPROPRIATENESS OF THE PROJECT. We believe the project is inappropriate in consideration of the site limitations, proposed uses and access problems discussed above. It is apparent that regional malls have become focal points of local communities. Much of the synergism of the local community in close proximity to regional shopping facilities is dictated by and occurs around the mall itself. As a result of the varied impacts, we believe good planning dictates extensive community involvement through the governmental process in determining where a mall should be located. This process should take place in an entire General Plan review rather than responding to one or more sites initiated by investors or developers. It should be initiated by the General Plan review process rather than a product of or reaction to a specific plan dealing with one parcel. This approach has been followed by many other communities wherein a single "future regional mall site" was designated after adequate planning review. Such planning ensures a more orderly development of the entire community and may encourage the desired regional development at an earlier date than otherwise achievable with multiple sites competing and ultimate legitimate users deferring decisions waiting to "see what happens in the Moreno Valley".

Riverside County Planning Department  
April 16, 1982  
Page Five

opportunity to set an example for growth and responsible development at all economic and commercial levels. Undue concentration of any use or density, whether low cost R-6 residential, commercial or industrial, creates an adverse reputation and stigma attached to many Southern California communities with which we are all familiar. It is our hope and anticipation that responsible planning disciplines and review will avoid such a result and assure an attractive, well-planned Moreno Valley community.

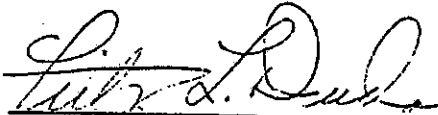
If you have further questions or areas that we may comment on, please do not hesitate to contact us.

Very truly yours,

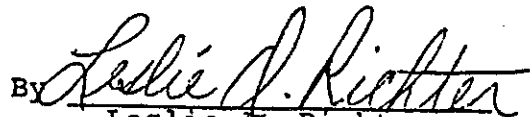
RIR ASSOCIATES

RIVERSIDE INTERNATIONAL RACEWAY

By

  
Fritz L. Duda  
Managing Partner

By

  
Leslie A. Richter  
President

FLD:sjj

cc: Norton Younglove  
Supervisor of the Fifth District  
Richard Purviance  
Planning Commissioner  
Patricia Nemeth  
Planning Director  
Corbin/Yamafuji and Partners, Inc.  
Attn: Don Corbin  
Albert A. Webb Associates  
Enos Reid, Esq.  
Reid, Babbage & Coil

Over the years, we have studied various land use plans for the excess property not required in the operation of the Riverside Raceway and in conjunction with previous and proposed improvements to the Raceway itself. This planning has continued with a view towards complementing the development of the area surrounding the Raceway and mindful of the long-term quality development approach of our ownership. The planning process has taken into consideration the extended interim nature of our use, market conditions and economic feasibility of various proposed uses.

In conjunction with a redevelopment plan being studied at this time for the Raceway property, a regional mall site has been included fronting on Highway 60 and accessed via the Day Street and Frederick Street interchanges. This plan includes the continued operation and redevelopment of the Raceway itself and is similar in compatibility of uses to the successful Santa Anita Fashion Park project. We believe such a joint use offers a unique planning opportunity consistent with the Santa Anita concept.

Our analysis of these preliminary studies has included market evaluations as well as direct contact with most major department store retailers. None of the department store users considers the Moreno Valley within the scope of their five-year planning cycles, and post-1990 considerations are entirely dependent upon future building activity and economic considerations not ascertainable at this time. While our ownership could readily align with any number of reputable national mall developers and commence a more specific planning process, it is apparent such action would be entirely premature and unduly burden the County planning staff. More importantly, development of the Valley over the next three to five years may dictate planning concepts not apparent at this time. We intend to continue to study the matter and monitor the planning and development process in this regard.

We suggest the County planning staff encourage a General Plan review that will take into consideration the more apparent uses suitable for the property which is the subject of the Draft EIR submitted. The largely undeveloped area of the Moreno Valley offers an

SOUTHERN CALIFORNIA  COMPANY

3700 CENTRAL AVENUE • RIVERSIDE, CALIFORNIA

R. W. RIDDELL  
Eastern Division  
Distribution Planning Supervisor

Mailing Address: P. O. BOX 2200, RIVERSIDE, CALIFORNIA 92516

April 22, 1982

Mr. Jerry Jolliffe  
Riverside County Planning Department  
County Administrative Center, Ninth Floor  
4080 Lemon Street  
Riverside, CA 92501

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APR 26 1982

RIVERSIDE COUNTY  
PLANNING COMMISSION

Re: The Springs Regional Shopping Center/Industrial  
Regional Team No. 1  
E.I.R. No. 168  
Specific Plan No. 174

Per our telephone conversation of April 21, 1982, Paragraph No. 3.19.2  
Impacts, Page 175, Natural Gas, line 2 should read (100 cubic feet =  
1 therm) instead of (100 therms = 1 cubic feet.)

Sincerely,



R. W. Riddell  
Distribution Planning Supervisor

RWR:ds