

COUNTY OF RIVERSIDE

ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY

Environmental Assessment (CEQ / EA) Number: 42690
Project Case Type (s) and Number(s): Surface Mining Permit #194 Revision 1 (SMP194R1)
Lead Agency Name: Riverside County Planning Department
Address: P.O. Box 1409, Riverside, CA 92502
Contact Person: Dionne Harris
Telephone Number: 951-955-6836
Applicant's Name: Skanska USA Civil West California District, Inc. (Skanska)
Applicant's Address: 1995 Agua Mansa Road, Riverside, CA, 92509

I. PROJECT INFORMATION

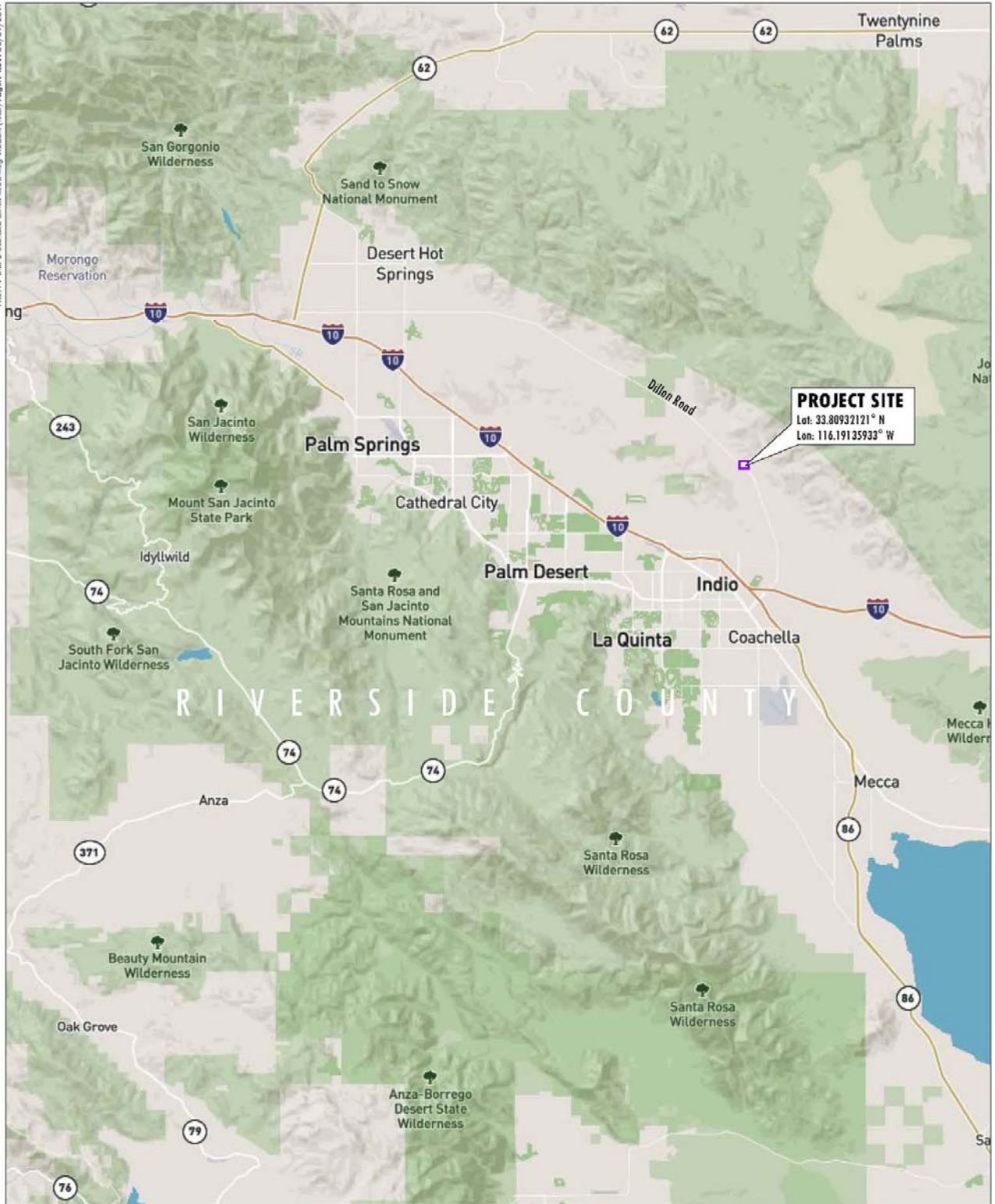
Project Description: Surface Mining Permit No. 194 Revision No. 1 (SMP194R1 or proposed revision) proposes a revision to the existing Riverside County approved 58-acre Dillon Road Mine (SMP 194 or 1995 approved Plan). The property site encompassing approximately 95.2 acres within eastern Riverside County and is located northeast of the City of Indio, approximately seven miles north of Interstate 10 (I-10) (see Figure 1). The proposed revision is requesting adding approximately 6.6 acres that were scraped for mining outside the 1995 approved mine limits but within their property boundary in the south-central portion for a revised total mine site of approximately 64.6 acres (see Figure 2); extending the length of the permit for an additional 25 years until December 31, 2044 to allow future utilization of the construction aggregate resources (sand and gravel) for local construction projects; and eliminating the future use of an approved asphalt plant from long-term plans.

The site is located within a Riverside County General Plan area designated Open Space – Mineral Resources (OS-MR) and zoned Mineral Resources & Related Manufacturing (M-R-A). Approximately 41 acres of the planned 64.6-acre site are currently disturbed by past mining with a mined slope of approximately 65 feet in depth. The mine is expected to produce aggregate on an on-demand basis to meet mainly construction projects; therefore, it could be idle for inactive periods of over one year or more. The operator will notify the County when the site meets the definition of “idle” and requirements per the State Mining and Reclamation Act (SMARA) and County Ordinance No. 555, Section 14 to submit and implement an Interim Management Plan (IMP).

During active periods, the mining operations will utilize loaders and dozers for the extraction of aggregate material from the pit, feeding the material into a portable crushing/screening plant for sorting and sizing, stockpiling the finished materials by size and product, and loading trucks for off-site shipping. The site will include maintenance/management/employee trailers, portable fuel storage tank(s), portable water tank, and a truck scale. No changes to production are requested; planned production will remain at an average of 100,000 tons per year (tpy) and occasionally a maximum of 200,000 (tpy) as previously approved. All other project parameters will be unchanged from the 1995 approved Plan including slopes, setbacks, production, traffic, and reclamation. The mine will be “horse-shoe shaped” with slopes reclaimed to 4H:1V (horizontal:vertical) and the maximum quarry depth will be 100 feet at the base of the northeastern slope. Setbacks on the east as established and conditioned by the 1995 approval will be maintained at 325 feet to limit any off-site head cut erosion. All existing conditions of approval will remain in-place with some conditions updated to current regulations (see Figure 3 for Revised Mine Plan).

Reclamation activities will be ongoing throughout the operational life of the quarry. At the conclusion of mining and production, final reclamation of one year will commence followed by monitoring the site's reclamation and revegetation success until deemed meeting its reclamation parameters. The post-mining or future land use is open space habitat.

File: F1 and 2 Service Dillon Road.jpg V:\CDK (TAG) Project REV: 03/01/2017



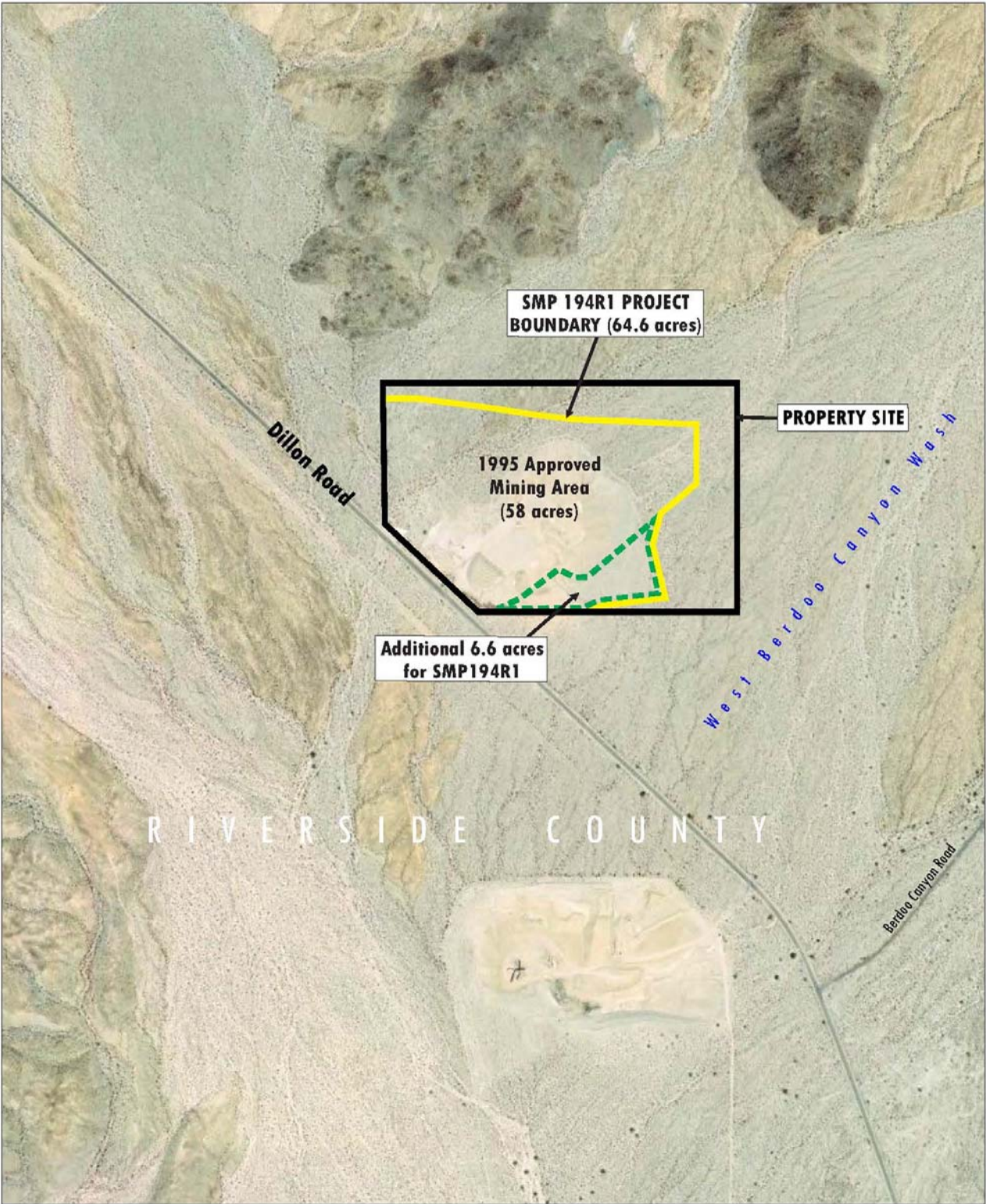
Source: Lilburn Corp., June, 2019.



REGIONAL LOCATION

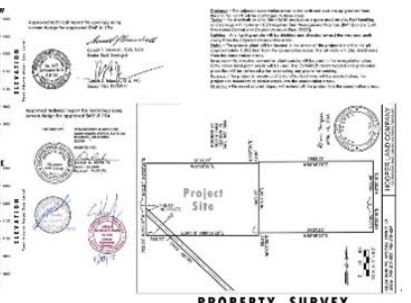
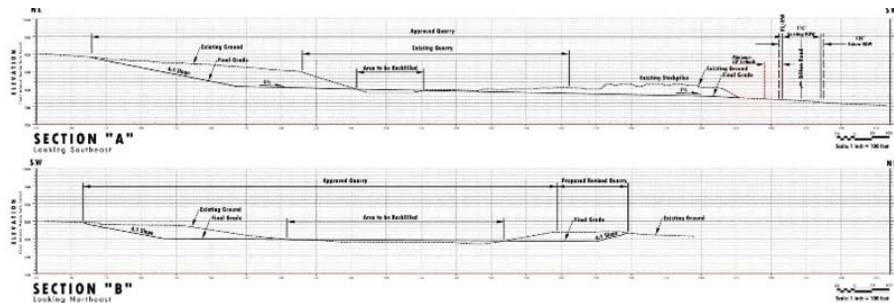
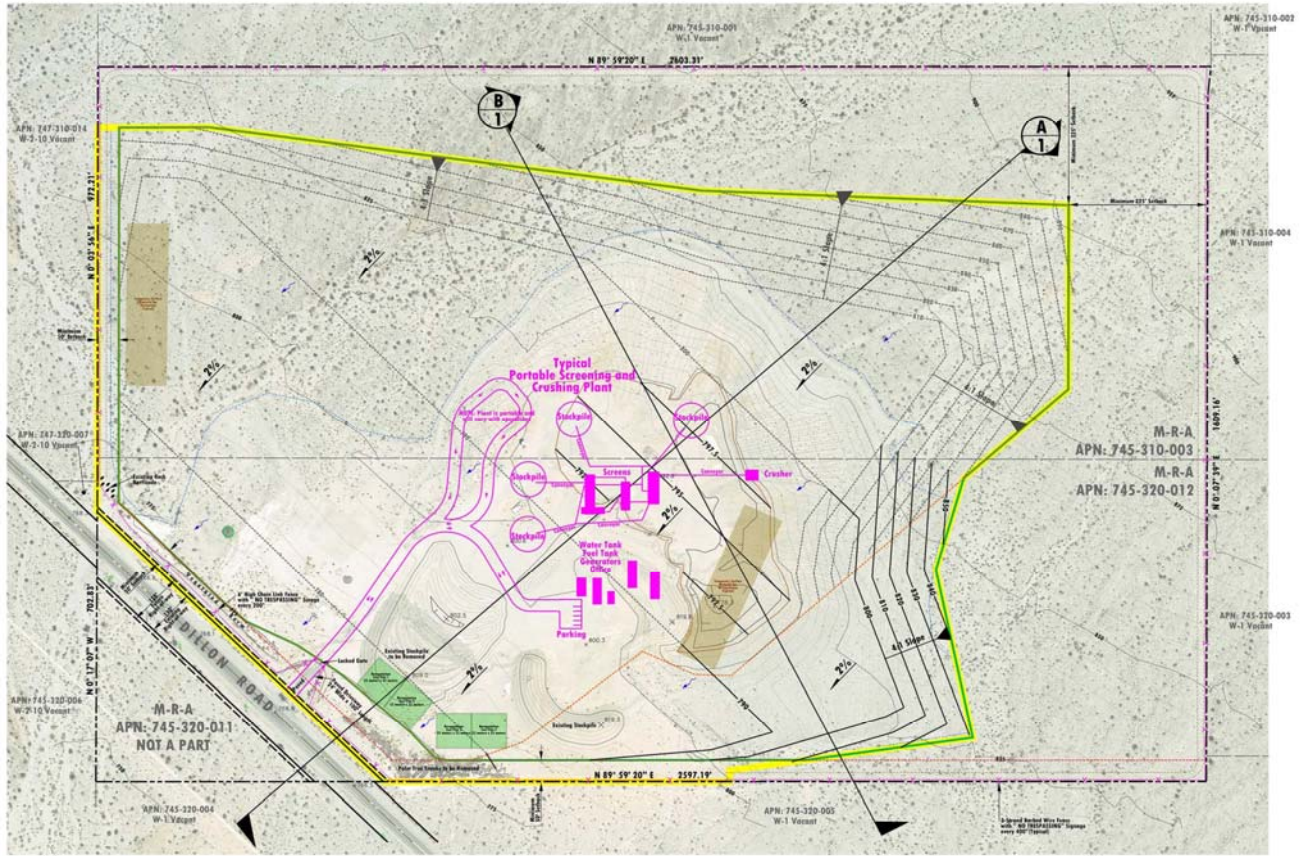
Dillon Road Mine
Skanska USA Civil West California District - SMP NO. 194R1
County of Riverside, California

FIGURE 1



PROJECT VICINTY
Dillon Road Mine
 Skanska USA Civil West California District - SMP NO. 194R1
 County of Riverside, California

FIGURE 2



LILBURN CORPORATION

In 1995, Environmental Assessment 36858/Mitigated Negative Declaration (1995 EA/MND) was adopted by the County Planning Commission to comply with the California Environmental Quality Act (CEQA). Conditions of approval (COAs) were adopted and are still in-place and implemented as applicable by the operator. Due to the proposed revisions, EA 42690/MND have been prepared by the County to assess the potential impacts and changes that SMP194R1 may have on the environment.

A. Type of Project: Site Specific ; Countywide ; Community ; Policy .

B. Total Project Area: 95.2 gross acres; 64.6-acre mine site

Residential Acres: 0	Lots: 0	Units: 0	Projected No. of Residents: 0
Commercial Acres: 0	Lots: 0	Sq. Ft. of Bldg. Area: 0	Est. No. of Employees: 0
Industrial Acres: 0	Lots: 0	Sq. Ft. of Bldg. Area: 0	Est. No. of Employees: 5 - 10
Other: 95.2 acres			

C. Assessor's Parcel No(s): 745-310-003 and 745-320-012

Street References: Northeast side of Dillon Road and northwest of Berdoo Canyon Road

Section, Township & Range Description or reference/attach a Legal Description: Section 19, Township 4 South, Range 8 East

D. Brief description of the existing environmental setting of the project site and its surroundings: The Property Site consists of approximately 95 acres; approximately 58 acres are permitted for mining of which 34.4 acres have been disturbed by mining activities over the past 35 years and another 6.6 acres were disturbed outside the approved mine limits. Currently the site is inactive; there are no facilities or equipment on-site. Two stockpiles of aggregate material are located on the southwest part of the site and palm tree trunks have been piled in the southwest. These stockpiles will be lowered to a maximum height of the allowable 50 feet and the tree trunks removed to reduce existing visual impacts. The site is fenced with a gated access and the disturbed areas are devoid of vegetation. Dillon Road is located on the southwest side of the site. Adjacent land uses are vacant and undeveloped. Three other mines are located to the south within one mile of the site.

II. APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

A. General Plan Elements/Policies:

- 1. Land Use:** SMP194R1 is located in the Western Coachella Valley Area Plan of the Riverside County Integrated Project. The General Plan Foundation Component and land use designation is Open Space-Mineral Resource (OS-MIN). This land use designation allows for mineral extraction and processing facilities based on the Surface Mining and Reclamation Act (SMARA) of 1975 classification. Site is classified by the State Geologist as Mineral Resource Zone-2 (MRZ-2) which is an area where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists. Ancillary structures or uses may be permitted which assist in the extraction, processing, or preservation of minerals. The proposed revision is consistent with OS-LU policies requiring compliance with County Ordinances and SMARA and an approved reclamation plan.
- 2. Circulation:** SMP194R1 does not impact any transportation facilities referenced in the General Plan and meets all other applicable circulation policies.

3. **Multipurpose Open Space:** SMP 194R1 is consistent with the Non-Renewable Resources – Mineral Resources policies requiring compliance with County Development Code and SMARA and to comply with conditions imposed by the County geologist to minimize or eliminate potential adverse impacts of mining on surrounding properties and environmental resources.
4. **Safety:** SMP194R1 does not propose any human-occupied structures that may be impacted by geologic and flood hazards. No steep slopes are proposed, water flow will be managed by project design. The site is not located in a high fire area and no hazardous materials besides diesel fuels regulated by current regulations are anticipated to be included in mine operation. No blasting will be conducted on-site. The site is fenced, will have no steep/unsafe slopes, and equipment will be removed when inactive for extended periods.
5. **Noise:** Surrounding parcels are undeveloped and vacant and therefore noise compatibility issues are not anticipated. General Plan policy for lands designated as Open Space-Mineral Resource be protected from encroachment of incompatible land uses through buffer zones or visual screening to reduce potential impacts.
6. **Housing:** SMP194R1 does not include the construction of housing and is not anticipated to create permanent employment opportunities which will require housing.
7. **Air Quality:** SMP194R1 will continue to implement existing conditions of approval and comply with South Coast Air Quality Management District (SCAQMD) rules and regulations to minimize exhaust, dust and carbon dioxide emissions consistent with General Plan policies.
8. **Healthy Communities:** SMP194R1 is in an OS-MIN land use designation that was determined as an appropriate area to minimize impacts to communities and human living and recreation areas. County policy requires buffers to protect mineral resources from encroachment of incompatible uses to a mining operation. The project site is in an isolated area that would not impact healthy communities and their policies.

9. **Environmental Justice (After General Plan Element is Adopted):** Not Applicable

B. **General Plan Area Plan(s):** Western Coachella Valley

C. **Foundation Component(s):** Open Space

D. **Land Use Designation(s):** Open Space-Mineral Resource (OS-MIN)

E. **Overlay(s), if any:** N/A

F. **Policy Area(s), if any:** N/A

G. **Adjacent and Surrounding:**

1. **General Plan Area Plan(s):** Western Coachella Valley

2. **Foundation Component(s):** Rural and Open Space

3. **Land Use Designation(s):** North – Open Space-Rural Desert (RD); East and Southeast - Open Space-Rural (OS-RUR); South – Open Space – Conservation (OS-C); and West – OS-RUR.

4. Overlay(s), if any: N/A

5. Policy Area(s), if any: N/A

H. Adopted Specific Plan Information

1. Name and Number of Specific Plan, if any: N/A

2. Specific Plan Planning Area, and Policies, if any: N/A

I. Existing Zoning: Mineral Resources & Related Manufacturing (M-R-A)

J. Proposed Zoning, if any: N/A

K. Adjacent and Surrounding Zoning: Watershed & Conservation Area (W-1) and Controlled Development (1 du per 10 acres) (W-2-10)

III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below (x) would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

- | | | |
|--|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Agriculture & Forest Resources | <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities / Service Systems |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Paleontological Resources | <input type="checkbox"/> Mandatory Findings of Significance |
| <input type="checkbox"/> Geology / Soils | <input type="checkbox"/> Population / Housing | |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services | |

IV. DETERMINATION

On the basis of this initial evaluation:

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED

I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project, described in this document, have been made or agreed to by the project proponent. **A MITIGATED NEGATIVE DECLARATION** will be prepared.

I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS PREPARED

I find that although the proposed project could have a significant effect on the environment, **NO NEW ENVIRONMENTAL DOCUMENTATION IS REQUIRED** because (a) all potentially significant effects of the proposed project have been adequately analyzed in an earlier EIR or Negative Declaration

pursuant to applicable legal standards, (b) all potentially significant effects of the proposed project have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, (c) the proposed project will not result in any new significant environmental effects not identified in the earlier EIR or Negative Declaration, (d) the proposed project will not substantially increase the severity of the environmental effects identified in the earlier EIR or Negative Declaration, (e) no considerably different mitigation measures have been identified and (f) no mitigation measures found infeasible have become feasible.

I find that although all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, some changes or additions are necessary but none of the conditions described in California Code of Regulations, Section 15162 exist. An **ADDENDUM** to a previously-certified EIR or Negative Declaration has been prepared and will be considered by the approving body or bodies.

I find that at least one of the conditions described in California Code of Regulations, Section 15162 exist, but I further find that only minor additions or changes are necessary to make the previous EIR adequately apply to the project in the changed situation; therefore a **SUPPLEMENT TO THE ENVIRONMENTAL IMPACT REPORT** is required that need only contain the information necessary to make the previous EIR adequate for the project as revised.

I find that at least one of the following conditions described in California Code of Regulations, Section 15162, exist and a **SUBSEQUENT ENVIRONMENTAL IMPACT REPORT** is required: (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; (2) Substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any the following:(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration;(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or,(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects of the project on the environment, but the project proponents decline to adopt the mitigation measures or alternatives.

Signature

Dionne Harris Project Planner

Printed Name

Date

For: Charissa Leach, P.E.
Assistant TLMA Director

V. ENVIRONMENTAL ISSUES ASSESSMENT

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000-21178.1), this Initial Study has been prepared to analyze the proposed project to determine any potential significant impacts upon the environment that would result from construction and implementation of the project. In accordance with California Code of Regulations, Section 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the County of Riverside, in consultation with other jurisdictional agencies, to determine whether a Negative Declaration, Mitigated Negative Declaration, or an Environmental Impact Report is required for the proposed project. The purpose of this Initial Study is to inform the decision-makers, affected agencies, and the public of potential environmental impacts associated with the implementation of the proposed project.

This EA/MND assesses the potential environmental impacts of SMP194R1 on the existing conditions. The EA/MND assessment incorporates project design, and existing conditions of approval and mitigation measures that were required in the 1995 approved SMP and EA/MND.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AESTHETICS Would the project:				
1. Scenic Resources				
a) Have a substantial effect upon a scenic highway corridor within which it is located?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Riverside County General Plan Figure C-8 “Scenic Highways”

Findings of Fact:

a-c) **Less than Significant Impact.** In accordance with Riverside County General Plan Figure C-8 “Scenic Highways”, the Project Site is located adjacent to Dillon Road, a County Eligible scenic highway mainly due to its view of open vistas and mountain ridges. The proposed revision could have a potentially significant impact related to scenic highway and scenic resources.

The Project Site lies on an alluvial fan at the foothills of the Little San Bernardino Mountain Range. 41 acres of the 64-acre project site are disturbed by previous mining activities. Vegetation is sparse and evenly distributed on undisturbed areas. The alluvial fan slopes to the southwest at a gradient of five to six percent. The surrounding open desert is vacant with the nearest residence being 1.25 miles northwest along Dillon Road. The proposed revision will not change previously approved land impacts and operations as well as the overall view or character of the project site. The project area and areas

south along Dillon Road are designated and zoned for mining and numerous mine operations currently operate in this area.

The mine site is not visible due to topography from residences to the northwest. The Project Site is primarily visible from Dillon Road at the entrance to and along the Project Site. Existing conditions require the operator to construct and maintain vegetated berms along Dillon Road to serve as view barriers. These berms will remain part of the revised plan. The view shed to the property is limited from the south. From the north driving southerly on Dillon Road, the operations can be seen on the left-hand side (easterly) of Dillon Road.

SMP194R1 is not anticipated to substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in an aesthetically offensive site open to public view, as the Project Site does not contain these resources and such resources are not located within the vicinity of the Project Site.

Adopted existing conditions and mitigation measures from the 1995 SMP and EA/MND) will be part of the revised project conditions:

4.21 - The processing plant shall be painted with colors which blend and camouflage with the surrounding areas.

4.24 - The permittee shall maintain the existing berm and existing native vegetation located along the Dillon Road boundary of the site as a buffer. This buffer shall remain in place during the life of this project.

The project will have less than significant impact with implementation of existing conditions and mitigation measures.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

2. Mt. Palomar Observatory	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?				

Source(s): Ord. No. 655 (Regulating Light Pollution)

Findings of Fact:

a) **No Impact.** The Project Site is located approximately 50 miles northeast of the Mt. Palomar Observatory and is therefore located outside of Ordinance No. 655 Zone A (15-mile radius) and Zone B (45-mile radius). Given the Project Site's distance from the Mt. Palomar Observatory, the General Requirements do not apply, and no impacts would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3. Other Lighting Issues				
a) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Expose residential property to unacceptable light levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): On-site Inspection, Dillon Road Mine SMP No. 194R1 Application

Findings of Fact:

a, b) **Less than Significant Impact.** The County of Riverside has established standards for the design, placement, and operation of outdoor lighting. These standards set forth the preferred lighting source, identify maximum lighting intensity, dictate shielding requirements, and establish hours of operation. Since these standards are imposed on all outdoor lighting sources, they are not considered mitigation for CEQA purposes. SMP194R1 will not change or add new lighting that has not been previously approved and in-place for past operations. Lighting impacts will be less than significant with adherence to County lighting standards. Furthermore, there are no residential developments adjacent to the Project Site and the nearest residence is located approximately 1.25 miles to the northwest.

As shown on Riverside County’s Map My County (GIS database), the Project Site is adjacent to the Coachella Valley Multi Species Habitat Management Plan (CVMSHCP) Desert Tortoise and Linkage Conservation Area, which is located to the north and east of the Project Site. To reduce edge impacts to an adjacent conservation area, the CVMSHCP requires implementation of Land Use Adjacency Guidelines. SMP194R1 will be conditioned to incorporate the following measure, regarding lighting, to comply with these guidelines:

- Lighting – Any lighting on-site will be shielded and directed inward and toward the west and south away from the adjacent conservation areas.

With implementation of the standards and measure listed above, SMP194R1 is not anticipated to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or expose residential property to unacceptable light levels. Less than significant impacts are anticipated, and no additional mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

AGRICULTURE & FOREST RESOURCES Would the project:

4. Agriculture				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm")?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riverside County Williamson Act FY 2015/2016 Sheet 2 of 3, GIS database, and Project Application

Findings of Fact:

a-d) **No Impact.** According to Riverside County's Map My County (GIS database), the Project Site is not located within prime farmland, unique farmland, or farmland of statewide importance; is not located in the vicinity of any agricultural reserves within in Non-Williamson Act Land; is not located within 300 feet of any land zoned primarily for agricultural use; and will not otherwise result in conversion of farmland to other uses. Therefore, no impact will occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5. Forest	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riverside County General Plan Figure OS-3b "Forestry Resources Eastern Riverside County Parks, Forests, and Recreation Areas"

Findings of Fact:

a-c) **No Impact.** As depicted on Riverside County General Plan Figure OS-3b "Forestry Resources Eastern Riverside County Parks, Forests, and Recreation Areas," the Project Site is not located within or adjacent to forest land or timberland. Therefore, SMP194R1 would not result in the loss of forest land or conversion of forest land to non-forest use and would not involve changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use. Therefore, no impact will occur.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

AIR QUALITY Would the project:				
6. Air Quality Impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): SCAQMD AQMP & CEQA Air Quality Handbook as updated, Dillon Road Mine SMP No. 194R1 Application, Updated Air Quality and Greenhouse Gas Assessment for Dillon Road Mine SMP No. 194R1, Lilburn Corp. updated June 2019.

Findings of Fact:

a) **Less than Significant Impact.** The project site is within the Salton Sea Air Basin (SSAB) and under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The AQMP was developed for the primary purpose of controlling emissions to maintain all federal and state ambient air standards for the district. A project is non-conforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan. A project is conforming if it complies with all applicable District rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan). Conformity with growth forecasts can be established by demonstrating that the project is consistent with the land use plan that was used to generate the growth forecast.

The existing project and SMP No. 194R1 are consistent with the County's zoning and General Plan land use classifications that were used to prepare the AQMP. SMP No. 194R1 will not create any additional population or traffic growth. In addition, based on Table 1 below, Project-generated emissions will not exceed the 1995 approved emission levels or the current SCAQMD CEQA emission thresholds and equipment and trucks will comply with all SCAQMD rules and regulations. This is due to the strict diesel emission reduction requirements promulgated by the California Air Resources Board (CARB) making today's diesel-fueled equipment and trucks much cleaner than those in 1995 and the elimination of the operation of the asphalt plant. The additional acreage in SMP194R1 will not increase emissions as overall daily and annual equipment use and production will not change. Only a small specific area of the mine site is mined at any one time. SMP No. 194R1 would not significantly increase local air emissions and therefore would not conflict with or obstruct implementation of the AQMP. Therefore, the project will have a less than significant impact.

b) **Less than Significant Impact.** The 1995 EA/MND determined that there was a potential impact to air quality and the EA and SMP required conditions and mitigation measures to reduce these potential impacts to less than significant. SMP No. 194R1 will be required to comply with the existing conditions

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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as updated and does not propose any increase in production, processing, equipment usage or trucking as compared to the existing 1995 approved project. Due to the time since the last air quality review, an "Updated Air Quality and Greenhouse Gas Assessment" was prepared by Lilburn Corporation (January 2018).

The air quality assessment prepared an updated emissions inventory utilizing current emission factors and required control conditions and measures from 1995 approved project and the SCAQMD. These are listed at the end of this section below with updates to be consistent with current SCAQMD regulations. The estimated air pollutant emissions and the significance of the increase in the proposed SMP No. 194R1 emissions as compared to the 1995 emissions totals and the 2019 CEQA thresholds are summarized in Table 1. Details of the parameters and estimations are included in the referenced report.

**Table 1
Dillon Road Mine (SMP 194R1)
Estimated 2018 Air Pollutant Daily Emissions and Significance
Compared to the Approved 1995 Levels and CEQA Thresholds**

		ROG	NO_x	CO	PM₁₀	PM_{2.5}
Equipment	Hours / Day	Lbs/Day	Lbs/Day	Lbs/Day	Lbs/Day	Lbs/Day
Loader	12	1.03	7.0	5.36	0.36	0.33
Dozer	8	0.95	6.37	4.31	0.37	0.34
Dump/Haul Truck	8	0.01	0.06	0.02	0.01	0.01
Water truck	2	0.01	0.12	0.05	0.01	0.01
Processing Plant & Generator	8	0.38	3.01	2.23	3.82	0.87
Fugitive Dust (dozing, loading, un-loading, road dust & stockpiles)	8	---	---	---	16.3	3.5
Trucks/Employee Vehicles On-Site	50	0.02	0.25	0.11	0.01	0.01
Trucks/Employee Vehicles Off-Site	50	2.38	24.65	12.16	1.28	1.17
2018 Emissions Totals	---	4.78	41.46	24.24	22.16	6.25
1995 EA Totals	---	6.4	80.0	33.7	83.2	21.7
2018 Compared to 1995 EA	---	-1.62	-38.54	-9.46	-61.04	-15.45
SCAQMD 2019 CEQA Operational Thresholds for SSAB		75	100	550	150	55
Significant?		No	No	No	No	No

Source: "Updated Air Quality and Greenhouse Gas Assessment", Appendix A for detailed emission inventory. Scenario Year: 2018; 1,000 tons/day; 40 trucks /day for 200 days /year; max. production capped at 200,000 tpy.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Emission Sources: SCAQMD EMFAC2007 Emission Factors for off-road mobile and on-road mobile vehicles; verified by Michael Krause at SCAQMD (12-22-2017) as adequate to use until District updates to EMFAC 2014 in its Air Quality section.

Particulate Matter Emission Factors - SCAQMD, July 2010; & AP-42 Section 13.2.2 EPA, November 2006.

* Dust related PM_{2.5} = 0.208 of PM₁₀ (CEIDARS List)

Mitigation: The following adopted and updated conditions and mitigation measures from the approved 1995 SMP and EA/MND to reduce potential impacts to less than significant are included below. No substantial changes to the project related to air quality are proposed in SMP194R1. No significant effects are identified.

ADOPTED UPDATED CONDITIONS / MITIGATION MEASURES FROM 1995 APPROVED SMP

The existing mining and processing are conducted under SMP 194 approved in 1995. The County's Conditions of Approval include measures to limit and monitor the air and dust emissions from the site. These include the following summarized below and listed by the condition number. Note that updated language per current regulations has been added in *italics*.

- 2.11 The permittee shall obtain any and all necessary permits or clearances from the South Coast Air Quality Management District. The permittee shall comply with all applicable SCAQMD rules and regulations, including, but not limited to Rule 403 for fugitive dust, *Rule 1157 for dust reduction from aggregate operations*, PM₁₀ requirements, and the operational requirements, and the operational requirements for asphalt concrete plants.
- 3.7 Prior to issuance of any special inspection permits, grading permits or surface disturbance, the permittee shall first obtain permits and/or clearance from the following public agencies among others: SCAQMD.
- 4.3 All roads, driveways, and mining areas shall be kept wetted while being used and shall be treated with EPA approved dust suppressants to prevent emission of dust. All semi-permanent or permanent access roads connecting the project with Dillon Road shall be paved with asphaltic concrete. Non-hazardous soil stabilizers shall be applied to all inactive surface mining areas and/or stockpiles (previously mined areas which remain inactive for 96 hours). (Amended by Planning Commission, 8-2-95)
- 4.7 All loaded trucks egressing from the subject property shall be properly trimmed with a ~~2-foot~~ *6-inch* freeboard height and/or covered or sprayed with water so as to minimize dust and prevent spillage onto the public roadway *in compliance with California Vehicle Code No. 23114*. In the event that spillage onto the road does occur, said spillage shall be removed immediately from the road right-of-way. (Amended by Planning Commission, 8-2-95)
- 4.11 Stockpiles and/or berms created for use in reclamation revegetation shall be protected against water and wind erosion by covering with burlap or other County approved material, wetting, and/or temporary seeding with native plant species.
- 4.20 All surface mining operations, including excavating, crushing, screening and related loading and hauling shall be suspended when wind speeds (as instantaneous gusts) exceed 20 miles per hour. All surface mining operations shall be suspended during first and second stage smog alerts. (Amended by Planning Commission, 8-2-95)

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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SCAQMD Regulatory Measures to Control Air Emissions

As part of their compliance with SCAQMD Rules 403, 403.1, and 1157 and implementation of the current conditions of approval, the operator implements the following measures during operations:

- Aggregate crushing/screening plant will have current air quality permits, and maintain and annually renew permits from the SCAQMD with water sprays for dust suppression;
- Water spray and/or use dust suppressants on unpaved roads and stockpiles so that no dust is visible more than 100 feet from any activity, equipment, storage pile, or disturbed area on-site;
- Limit speeds on unpaved internal haul roads to 15 mph;
- Water spray mining, excavating, loading, unloading, and transferring activities;
- Remove any spilled aggregate and water sweep paved roads including adjacent portion of Dillon Road as needed;
- Cover or otherwise stabilize aggregate loads (i.e., loads to remain 6 inches from the upper edge of the container area) to avoid dust emissions from product transport trucks in compliance with California Vehicle Code No. 23114;
- Use a rumble grate with paved entrance road to eliminate track out;
- Main access road and driveway are paved;
- Surface mining operations, including excavating, crushing, screening and related material loading and hauling, shall be suspended when wind speeds (as instantaneous gusts) exceed 20 miles per hour;
- All equipment is maintained and tuned according to manufacturer’s specifications;
- Production is scheduled to minimize daily equipment operations and idling trucks;
- During operations, trucks and vehicles in loading and unloading queues will have their engines turned off when not in use for more than five minutes to reduce idling and vehicle emissions. *(Note that this reduced idling limitation measure is required under Title 13, California Code of Regulations, Section 2485 Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. The on-site operator supervises vehicles that access the site for loading and unloading and off-road trucks and equipment to comply with this regulation); and*
- Compliance with all existing and future CARB and SCAQMD regulations related to diesel-fueled trucks and equipment, which may include among others: (1) meeting more stringent emission standards; (2) retrofitting existing engines with particulate traps; (3) use of low sulfur fuel; and (4) use of alternative fuels or equipment.

Mitigation: Diesel emissions from equipment and trucks are embedded in the compliance for all diesel fueled engines, trucks, and equipment with the statewide CARB Diesel Reduction Plan. These

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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measures are implemented by CARB in phases with new rules imposed on existing and new mobile diesel-fueled off-road and on-road equipment and trucks.

Monitoring: Annual SCAQMD permits and compliance with the state’s diesel reduction diesel-fueled off-road and on-road equipment and trucks shall be available for review by the County. Dust control measures shall be inspected during the County’s annual mine inspection. The operator shall monitor dust control implementation on a daily basis during active production.

c,d) **No Impact.** There are no sensitive receptors located within one mile of the project site; the proposed revision does not involve construction of a sensitive receptor; and the proposed revision will not create any objectionable odors that may affect a number of people. The elimination of the previously approved asphalt plant further reduces the potential to release objectionable odors. SMP No. 194R1 would not create any impacts to sensitive receptors or create substantial odors. Therefore, no impact will occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

BIOLOGICAL RESOURCES Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
7. Wildlife & Vegetation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): GIS database, CVMSHCP, On-site Inspection, Dillon Road Mine SMP No. 194R1 Application, and General Biological Resources Assessment prepared by RCA Associates, Dec. 2017.

Findings of Fact:

a) **Less than Significant Impact.** As shown on Riverside County's Map My County (GIS database), the Project Site is adjacent to the Coachella Valley Multi Species Habitat Management Plan (CVMSHCP) Desert Tortoise and Linkage Conservation Area, which is located to the north and east of the Project Site. As included in the Dillon Road Mine SMP No. 194R1, in order to reduce edge impacts to an adjacent conservation area, the CVMSHCP requires implementation of Land Use Adjacency Guidelines. SMP194R1 will be designed and conditioned to comply with these guidelines:

- Drainage – The adjacent conservation areas to the north and east are up gradient from the site. No runoff will be discharged to these areas.
- Toxics – No chemicals or other harmful bi-products are generated on-site. Fuel handling and storage will implement Department of Environmental Health (DEH) required Best Management Practices (BMPs) and a Spill Prevention Control and Counter-Measure Plan (SPCC). No blasting nor blasting materials will be used or stored on-site.
- Lighting – Any lighting on-site will be shielded and directed inward and toward the west and south away from the adjacent conservation areas.
- Noise – the aggregate processing plant will be located in the center of the Project Site within the pit, approximately 1,000 feet from the conservation areas. The pit walls will shield noise from the conservation areas. The elimination of the asphalt batch plant will also reduce noise levels. No blasting will be conducted on-site.
- Invasive Plants – No invasive, non-native plant species will be used in the revegetation plan. Only native local plant seeds will be used. The CVMSHCP's recommended and prohibited plant lists will be reviewed prior to selecting any plants for seeding.
- Barriers – The Project Site is remote, and 3-strand is erected along the project site boundary to restrict access into the conservation areas.
- Grading – No manufactured slopes will extend off the project into the conservation areas.

With implementation of the guidelines and conditions required under the CVMSHCP listed above, SMP194R1 is not anticipated to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan. A less than significant impact is anticipated.

b) **Less than Significant Impact with Mitigation Incorporated.** The findings from the 2017 General Biological Resources Assessment (BRA) for SMP194R1 regarding endangered or threatened species are summarized herein. The following federal and state listed endangered or threatened species have been documented within a five-mile radius of the Project Site: Desert tortoise (*Gopherus agassizii*), Coachella Valley fringed-toed lizard (*Uma inornata*), Desert pupfish (*Cyprinodon macularius*), and Southwest willow flycatcher (*Empidonax traillii*).

A focused protocol survey was conducted for the threatened desert tortoise as part of the general field investigations. Because of the past and ongoing mining activities, the soil across the Project Site is

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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highly rocky and with continual fluctuations in terrain and is mostly barren, making it poor habitat for desert tortoise. The protocol surveys performed on the site did not identify any tortoises nor were any active tortoise burrows or sign (scats, tracks, etc.) observed. A less than significant impact to tortoise is expected. However, marginal habitat for tortoises is present on the site and to reduce any potential impact, new mitigation measures BIO-1 and BIO-2, listed below, will be implemented.

The Coachella fringed-toed lizard is limited to sand dunes and the known populations of the species are relatively limited in the Coachella Valley area. No sand dunes are present on the Project Site; therefore, the species is not expected to occur on the site.

Desert pupfish populations of the desert pupfish are very rare in Riverside County and are dependent on pools of water. The Project Site does not support any ponds, pools, or other water features that would be suitable for use by desert pupfish.

Populations of Southwestern willow flycatchers are located along rivers, stream, and lakes where riparian habitat is present; however, populations are very uncommon. This species is dependent upon extensive areas of undisturbed riparian habitat and given the absence of riparian areas of on the Project Site, the species does not occur on the Project Site.

The 1995 EA/MND determined that the Existing Project could have potentially significant impact related to biological resources and required implementation of conditions listed below to reduce biological impacts to less than significant. Based on the updated biological conditions and findings described in the 2017 General BRA, SMP194R1 is not anticipated to create any new significant impacts, either directly or through habitat modifications, on any state or federally listed endangered or threatened species. To limit any potential impact to desert tortoise, the following new mitigation measures listed as BIO-1 and 2 are recommended. A less than significant impact with implementation of mitigation incorporated is anticipated.

c) **Less than Significant Impact with Mitigation Incorporated.** The 2017 BRA notes that there are eight sensitive plant species and thirteen sensitive wildlife species which have been documented in the region. Based on the data collected by RCA Associates, the Project Site is not expected to support populations of Chaparral sand-verbena, Coachella Valley milkvetch, Little San Bernardino Mts. Linanthus, Robinson monardella, and Triple-ribbed milk-vetch. Three of the plant species (San Bernardino milk-vetch, Mecca aster, and Latimer’s woodland gilia) could potentially occur on the site given the presence of suitable habitat; however, the probability of these plants’ presence on the Project Site is relatively low based on past disturbances.

There are thirteen wildlife species which are listed as species of special concern by the California Department of Fish and Wildlife (CDFW) which have been documented in the general area surrounding the Project Site. The field investigations conducted in April 2017 did not identify any sensitive wildlife species. Additionally, the Project Site has been disturbed by mining activities and therefore is unlikely to support any species classified by the CDFW as species of special concern. The habitat requirements for the majority of the species which could potentially occur in the region is relatively specific and as such, most of the species are not expected to occur on the Project Site.

CDFW species of special concern which could potentially inhabit the Project Site are limited to burrowing owl, San Diego woodrat, coast horned lizard, and loggerhead shrike. Based on the 2017 BRA, although no burrowing owls were present on the site or in the surrounding area, suitable habitat

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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is present and the species could potentially occur. Therefore, Mitigation Measure BIO-3, listed below, a standard measure for most new development, will be implemented.

Furthermore, migratory nesting birds, such as the loggerhead shrike, could potentially inhabit the Project Site. Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and Fish and Game Code which prohibit the take, possession, or destruction of birds, their nests or eggs. In the 1995 approval, Condition 4.22 requires grading of undisturbed areas outside of the nesting period. This condition has been updated below. Therefore, with implementation of the 1995 conditions and the new measures included below, SMP194R1 is not anticipated to create any new significant impacts on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or U.S. Fish & Wildlife Service (FWS). There will therefore be a less than significant impact with implementation of mitigation incorporated.

d) **Less than Significant Impact.** (Also refer to a above) In regard to habitat fragmentation and wildlife movement, the 2017 BRA states the following: Habitat fragmentation and subsequent impacts to wildlife movements occur when a proposed action results in a single, unified habitat area being divided into two or more areas. This frequently results in the isolation of areas which prevents wildlife from moving freely from one portion of a habitat to another habitat, or from one habitat type to another habitat type. The property is located in an area where several other active mines are present besides the subject Dillon Road Mine and is along the Dillon Road Corridor. Note that the CVMSHP has established the Desert Tortoise and Linkage Conservation Area to the north and east to provide wildlife movement.

The Project Site is in an area along Dillon Road where habitat has been fragmented to a large extent due to past mining activities in the surrounding region. SMP194R1 is not expected to create any new impact on wildlife corridors, nor will SMP194R1 result in any new habitat fragmentation and or impacts to regional wildlife movement. There will therefore be a less than significant impact.

e) **Less than Significant Impact.** The 2017 BRA notes that a drainage channel bisects the northern portion of the Project Site, traversing southwesterly. However, the plants present within the channel were similar to the surrounding area and no riparian vegetation or any plant species associated with riparian/riverine habitats were observed. The Project Site does not support any sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or FWS. The 1995 EA/MND determined that the Existing Project could potentially affect a jurisdictional drainage and Condition 3.7 (see Adopted Conditions and Mitigation Measures below) required the operator to contact CDFW to determine 1602 permit requirements. The drainage channel has not been impacted by mining during the past 20 years. This condition has been updated below to require the operator to contact CDFW prior to any new disturbance within 25 feet of the drainage alignment. SMP194R1 is not anticipated to create any new significant impacts impact related to jurisdictional waters with implementation of the existing condition. 3.7. There will be a less than significant impact with implementation of existing condition 3.7.

f) **No Impact.** As stated in Findings of Fact 7e, a drainage channel bisects the northern portion of the Project Site, traversing southerly. The drainage channel, however, does not connect with waters of the U.S. as it is cut off from flowing to the Whitewater River or the Salton Sea due to the All-American Canal. SMP194R1 is not anticipated to create any new significant impacts. There will be no impact and no mitigation measures are required.

g) **Less than Significant Impact.** The General BRA concludes that SMP194R1 will not conflict with or have any impact on any local policies or ordinances. With adherence to Land Use Adjacency Guidelines

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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listed in Findings of Fact 7a and implementation of the updated mitigation measures, listed below, less than significant impacts are anticipated.

Mitigation (and Conditions): The 1995 EA/MND determined that the Existing Project could have potentially significant impact related to wildlife and vegetation. The following adopted conditions and mitigation measures from the 1995 approved SMP and EA/MND to reduce potential impacts to less than significant are included below. Updated measures are in *italics*.

ADOPTED CONDITIONS AND MITIGATION MEASURES FROM 1995 SMP AND EA 36858/MND

- 3.7 Prior to issuance of any special inspection permits, grading permits or surface disturbance, the permittee shall first obtain permits and/or clearance from following public agencies among others: CA Fish and Wildlife and U.S. Fish and Wildlife Service.

Updated Condition 3.7 for Biology:

Prior to issuance of any special inspection permits, grading permits or new surface disturbance within 25 feet of the drainage area on the northwest portion of the site, the operator shall contact CDFW to determine if a 1602 Streambed Alteration Agreement is required, and if so, shall obtain said agreement.

- 4.22 The clearing and excavation of vegetation in the undisturbed and previously unmined areas of the site shall occur outside the months of March through May, which is the nesting season of the local bird population.

Updated Condition 4.22:

In order to ensure compliance with the MBTA, a nesting bird clearance survey will be required prior to any vegetation removal or new ground disturbing activities during the nesting season (generally from February 1 – August 31 but can vary annually based upon seasonal weather conditions).

If an active avian nest is discovered during the pre-construction clearance survey, construction activities shall stay outside of a 300-foot buffer around the active nest. For raptors including burrowing owl, this buffer is expanded to 500 feet. It is recommended that a biological monitor be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities can resume.

- 4.23 During the clearing of native vegetation in areas to be mined, the permittee shall salvage individual barrel cacti and other cacti plants. These plants shall be replanted on the perimeter berms of the project or offered to local residents or cactus nurseries.

The following new mitigation measures shall be implemented to reduce potential impacts to wildlife associated with SMP194R1 to a less than significant level:

RECOMMENDED NEW MITIGATION MEASURES

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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BIO-1: Prior to the start of any onsite activities, personnel associated with the operation shall be required to attend a desert tortoise education seminar. The awareness program shall be provided to all new employees and reviewed with all personnel and truck drivers quarterly.

BIO-2: Pre-construction or avoidance surveys shall be conducted within 14 days prior to initiating new ground disturbance to determine presence or absence of the desert tortoise. If desert tortoise is found on-site and cannot be avoided, consultation with U.S. Fish and Wildlife (FWS) under the federal Endangered Species Act and the CDFW review under Section 2081 of the state Fish and Game Code must be initiated and applicable "take" permits obtained.

BIO-3: A pre-construction burrowing owl clearance survey shall be conducted prior to any vegetation removal or new ground disturbing activities on undisturbed areas to ensure burrowing owls are absent from the survey area. The clearance survey should be conducted in accordance with the CDFW 2012 Staff Report on Burrowing Owl Mitigation. Two pre-construction clearance surveys shall be conducted 14-30 days and 24 hours prior to any vegetation removal or new ground disturbing activities throughout all areas determined to support suitable habitat for burrowing owls.

If burrowing owl or an occupied burrow is observed on-site during the survey, avoidance, minimizations and mitigation recommendations in the CDFW 2012 Staff Report shall be implemented.

Monitoring: Survey results from the required conditions and mitigation measures shall be provided to the Planning Dept. prior to disturbance of undisturbed areas. Reclamation and revegetation shall be monitoring during the County's annual mine inspection. Records of desert tortoise and desert tortoise education shall be maintained on-site for County review.

CULTURAL RESOURCES	Would the project:			
8. Historic Resources				
a) Alter or destroy a historic site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): EA 36858/MND, "Archaeological Assessment of the Dillon Road Mine," Archaeological Associates 1995, on-site Inspection, Dillon Road Mine SMP No. 194R1 Application, GIS Database

Findings of Fact:

a-b) **No Impact.** EA 36858/MND, prepared in 1995, included an "Archaeological Assessment of the Dillon Road Mine," Archaeological Associates 1995, which found that no archaeological or historical materials were noted on the Project Site and that no further archaeological research or monitoring is recommended. Furthermore, the Project Site is not located within or in the vicinity of any Historic Preservation Districts as identified by Riverside County's Map My County (GIS Database). Considering the Project Site has been impacted by mining activities since the time of the last EA, SMP194R1 is not anticipated to alter or destroy a historic site or cause substantial adverse change in the significance of a historical resource as defined in California Code of Regulations, Section 15064.5. Therefore, no impact will occur.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

9. Archaeological Resources	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Alter or destroy an archaeological site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): EA 36858/MND, "Archaeological Assessment of the Dillon Road Mine," Archaeological Associates 1995, Dillon Road Mine SMP No. 194R1 Application.

Findings of Fact:

a, b) **No Impact.** EA 36858/MND, prepared in 1995, included an "Archaeological Assessment of the Dillon Road Mine," Archaeological Associates 1995, which found that no archaeological or historical materials were noted on the Project Site and that no further archaeological research or monitoring is recommended. Considering the Project Site has been impacted by mining activities since the time of the last EA, SMP194R1 is not anticipated to alter or destroy an archaeological site or cause substantial adverse change in the significance of an archaeological resource. SMP194R1 will include standard conditions to stop operations and to avoid any cultural resources that may be inadvertently uncovered during operations. Therefore, no impact will occur

c) **Less than Significant Impact.** SMP194R1 includes ground-disturbing activities which have the potential to uncover human remains. SMP194R1 will include standard conditions to stop operations and avoid any possible human remains and to contact the Riverside County Coroner's office in the event that human remains are discovered. Therefore, a less than significant impact is expected.

Mitigation: The 1995 EA 36858/MND determined that the Existing Project would have no impact related to archaeological resources. SMP194R1 is not anticipated to create any new significant impacts related to archaeological resources and no new mitigation measures are required. However, standard conditions of approval for all development projects that impact undisturbed areas will be included and implemented if any archaeological resources or human remains are inadvertently uncovered during operations as listed below:

Recommended New Conditions to Protect Archaeological Resources:

CR-1: *In the event archaeological, paleontological and/or historical resources are uncovered during earthmoving activities, all work in that area shall cease immediately and a qualified archeologist shall be retained to assess the findings, and if necessary provide appropriate disposition of the resources. Earthmoving shall be diverted temporarily around the deposits until they have been evaluated, recorded, excavated, and/or recovered as necessary. Earthmoving shall be allowed to proceed on the site when the archaeologist, in consultation with the appropriate Native American Tribe(s) and the County of Riverside, determines the resources are recovered to their satisfaction.*

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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CR-2: *If possible human remains are encountered during any earthmoving activities, all work shall stop immediately in the area in which the find(s) are present, and the Riverside County Coroner must be notified. County planning and the owner of the site shall also be called and informed of the discovery. Disturbing human remains is against federal and state laws and there are criminal/civil penalties including fines and/or time in jail up to several years. The Coroner will determine if the bones are historic/archaeological or a modern legal case.*

State law dictates that the Native American Heritage Commission (NAHC) shall be notified in the event that remains are determined to be human and of Native American decent, in accordance with California Public Resources Code Section 5097.98.

Monitoring: Employees will be required to stop work and avoid any potential historical and archaeological resources or human remains if uncovered during ground-disturbing activities and report findings to their supervisor followed by compliance with the conditions above.

ENERGY Would the project:				
10. Energy Impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): EA 36858/MND, Dillon Road Mine SMP No. 194R1 Application

Findings of Fact:

a,b) **No Impact.** The 1995 EA /MND determined that the Existing Project would have “no impact” related to energy resources. No substantial changes related to wasteful or inefficient consumption of energy resources are proposed in SMP194R1. SMP194R1 is not anticipated to conflict with any adopted energy conservation plans. The project will have no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

GEOLOGY AND SOILS Would the project directly or indirectly:				
11. Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): GIS database, EA 36858/MND

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Findings of Fact:

a) **Less than Significant Impact.** The Project Site is in seismically active southern California with numerous fault systems in the region. The Project Site is not located within one-half mile of an earthquake fault zone. All structures are required to comply with the Uniform Building Code which incorporates standards to protect buildings from seismic shaking; no habitable structures are proposed on-site. Condition 3.7 below requires the operator to comply with Building and Safety and Planning requirements. The project will have a less than significant impact.

3.7 Prior to issuance of any special inspection permits, grading permits or surface disturbance, the permittee shall first obtain permits and/or clearance from the following public agencies among others:

- | | |
|-------------------------|--------------------------------|
| Co. Planning Department | Co. Transportation Dept. |
| Co. Building & Safety | Co. Environmental Health Dept. |
| Co. Fire Dept. | |

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

12. Liquefaction Potential Zone	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Be subject to seismic-related ground failure, including liquefaction?				

Source(s): Riverside County General Plan Figure S-3 "Generalized Liquefaction"

Findings of Fact:

a) **Less than Significant Impact.** The Project Site is in an area which has a moderate potential for liquefaction. Therefore, SMP194R1 is required to adhere to the applicable policies listed in the Safety Element of the County of Riverside General Plan. No habitable structures are proposed on-site; Condition 3.7 requires the operator to comply with Building and Safety and Planning requirements. Less than significant impacts are anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

13. Ground-shaking Zone	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Be subject to strong seismic ground shaking?				

Source(s): Riverside County General Plan Figure S-4 "Earthquake-Induced Slope Instability Map," and Figures S-13 through S-21 (showing General Ground Shaking Risk)

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Findings of Fact:

a) **No Impact.** The Project Site is in seismically active southern California with numerous fault systems in the region. The Project Site is not located within one-half mile of an earthquake fault zone. No habitable or human-occupied structures or permanent structures are proposed on-site. All portable structures are required to comply with the Uniform Building Code which incorporates standards to protect buildings from seismic shaking; Condition 3.7 requires the operator to comply with Building and Safety and Planning requirements. Therefore, no impact will occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

14. Landslide Risk

a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?

Source(s): On-site Inspection, Riverside County General Plan Figure S-5 “Regions Underlain by Steep Slope” and Dillon Road Mine SMP No. 194R1 Application

Findings of Fact:

a) **No Impact.** The site has a very slight slope to the northeast with no risks from landslides. Mining slopes are addressed in Section 16 below. Therefore, no impact will occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

15. Ground Subsidence

a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence?

Source(s): Riverside County General Plan Figure S-7 “Documented Subsidence Areas Map”

Findings of Fact:

a) **Less than Significant Impact.** According to Riverside County General Plan Figure S-7 “Documented Subsidence Areas,” the Project Site is located in an area which is susceptible to subsidence. No habitable or human-occupied structures or permanent structures are proposed on-site. All portable structures are required to comply with the Uniform Building Code which incorporates standards to protect buildings from geologic hazards; Condition 3.7 listed under Section 10 above requires the operator to comply with Building and Safety and Planning requirements. Therefore, less than significant impacts are anticipated.

Mitigation: No mitigation is required.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Monitoring: No monitoring is required.

16. Other Geologic Hazards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riverside County General Plan Figure S-10 “Dam Failure Inundation Zones

Findings of Fact:

a) **No Impact.** The Project Site is not located in an area susceptible to seiches, mudflow, or volcanic hazard. No impacts are anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

17. Slopes	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Change topography or ground surface relief features?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in grading that affects or negates subsurface sewage disposal systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riv. Co. 800-Scale Slope Maps and Dillon Road Mine SMP No. 194R1 Application

Findings of Fact:

a-b) **Less than Significant Impact.** As stated in the Dillon Road Mine SMP No. 194R1, the mine was and is designed as a “horseshoe” shaped quarry with finished slopes on the north and east not to exceed 4H:1V with a depth of approximately 100 feet on the east. The pit floor will daylight to the west with a slight gradient of two percent. These elevations correspond to the existing elevation of 890 feet above mean sea level (amsl) on the east to an average pit floor of 790 feet amsl. No active slopes will exceed 1H:1V and 30 feet in height. The approved 4H:1V slopes for the Project Site will not be changed from those approved in 1995. These slopes were determined to be grossly surficially stable under both static and seismic conditions by a slope stability analysis performed by CHJ, Inc in March 1995. Therefore, impacts in this regard are considered less than significant, and no mitigation measures are required.

c) **No Impact.** No subsurface sewage disposal systems will be disturbed by SMP194R1, since these systems currently do not exist on-site and are not proposed. Portable sanitation stations will be available on-site for employees. No impacts are anticipated.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
18. Soils				
a) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Be located on expansive soil, as defined in Section 1802.3.2 of the California Building Code (2007), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): U.S.D.A. Soil Conservation Service Soil Surveys, Dillon Road Mine SMP No. 194R1 Application, On-site Inspection

Findings of Fact:

a) **Less than Significant Impact.** SMP194R1 does not propose any changes to the previously approved pit design or changes to the existing drainage patterns. A "Hydrology Report" was prepared by Don Berg (July 1995) and the 1995 adopted EA/MND addressed the potential head cut erosion that could be caused by the pit slopes. It was determined and agreed by the Riverside County Flood Control and Water Conservation District that the gentle 4H:1V slopes and the 325-foot set back would be adequate to minimize the potential head cut erosion that could occur off-site.

Water erosion will be minimized by the 325-foot setback on the north and east to limit any off-site head-cut erosion and implementation of the Storm Water Pollution Prevention Plan (SWPPP). Typical measures to control erosion include the creation of earthen and hard-faced ditches, remedial grading, revegetation, and supplemental sand bagging and placement of straw bales. The Project Site will be visually inspected after major precipitation events to determine if any substantial erosion is evident such as sheet, rill or gully erosion or any surficial instability. Appropriate erosion control measures will be implemented where erosion is observed. The inspection for erosion and the maintenance of drainage/erosion control measures will be in conformance with the SWPPP. Therefore, the impact will be less than significant.

b) **Less than Significant Impact.** The Project Site sits on an older alluvium fan and consists of well drained soils defined as the Chuckwalla Series, Group B soils. Group B soils are defined as soils having a moderate infiltration rate when thoroughly wet. These soils have a moderate rate of water transmission and are typically considered to contain a low to moderate shrink-swell potential. Based on the characteristics of Group B soils, the Project Site is not anticipated to contain expansive soils. Therefore, the impact will be less than significant related to soil expansion are anticipated. No new mitigation measures are required.

c) **No Impact.** SMP194R1 will include the temporary use of portable toilets as necessary. Therefore, septic tanks and sewer systems will not be required for SMP194R1. No impacts will occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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19. Wind Erosion and Blow sand from project either on or off site.

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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a) Be impacted by or result in an increase in wind erosion and blow sand, either on or off site?

Source(s): Riverside County General Plan Figure S-8 “Wind Erosion Susceptibility Map,” Ord. No. 460, Article XV & Ord. No. 484, and Dillon Road Mine SMP No. 194R1 Application

Findings of Fact:

a) **Less than Significant Impact.** The Project Site is located within a high wind erodibility rating area. The 1995 EA and SMP required conditions and mitigation measures to reduce blowing dust. SMP194R1 required the following conditions of approval which shall be implemented to minimize wind erosion and blowing dust, in accordance with SCAQMD Rules 403, 403.1, and 1157 listed under Section 6, Air Quality, above.

Mitigation: No mitigation measures are required.

Monitoring: No monitoring measures are required.

GREENHOUSE GAS EMISSIONS Would the project:

20. Greenhouse Gas Emissions

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Source(s): Riverside County Climate Action Plan December 2015 and Updated Air Quality and Greenhouse Gas Assessment for Dillon Road Mine SMP No. 194R1, Lilburn Corp. January 2018.

Findings of Fact:

a-b) **Less than Significant Impact.** The following is a summary of the Updated Air Quality and Greenhouse Gas Assessment referenced above.

The County of Riverside adopted a Climate Action Plan (CAP) as part of their General Plan Amendment process on December 8, 2015. The County has prepared and will implement the CAP to help ensure that the impact of development on air quality is minimized, energy is conserved and land use decisions and all internal operations within Riverside County are consistent with adopted state legislation. The CAP sets a target to reduce community wide GHG emission emissions by 15% from 2008 levels by 2020 consistent with the state reduction goals in AB 32.

The County of Riverside has not adopted its own thresholds of significance for greenhouse gas emissions; however, the County’s CAP has set a target to reduce community wide GHG emission emissions by 15% from 2008 levels by 2020. A reduction strategy is described in Chapter 4 of the CAP that would meet the state reduction goal.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The CEQA guidelines support projects that lower the carbon footprint of new development and encourage programmatic mitigation strategies that may include reliance on adopted regional blueprint plans, CAPs and general plans that meet regional and local GHG emissions targets and that have also undergone CEQA review. The County is responsible for ensuring that new projects conform to these guidelines and meet the goals and requirements outlined in the CAP. The County implements the reduction measures for new development during the CEQA review through the use of a GHG Screening Table document (CAP - Appendix F).

However, more unusual types of industrial projects such as in this case construction-type mining activities cannot use the Screening Tables because the emission sources for those types of land uses were not contemplated in the table. In the CAP, Appendix F, the County determined that a project that emits less than 3,000 metric tons of carbon dioxide equivalent (MTCO_{2e}) defines a small project that is considered less than significant and so not need to use the Screening Tables or alternative GHG mitigation analysis. In addition, the SCAQMD adopted an Interim GHG Significance Threshold for industrial projects of 10,000 MTCO_{2e}/year.

For SMP194R1, which is proposing no changes that would increase GHG, the project’s onsite and mobile GHG emissions were screened using the SCAQMD “Air Quality Handbook” guidelines, Emission Factors for On-Road Heavy-Heavy Duty Diesel Trucks (Emfac 2007) (as verified to use by Michael Krause - SCAQMD 12-22-2017), and SCAQMD Off-Road Mobile Source Emissions Factors (year 2018).

Project-related GHG emissions are shown in Table 2 and were compared to the CAP threshold of 3,000 MTCO_{2e} and the interim SCAQMD industrial threshold of 10,000 MTCO_{2e} per year as potentially significant to global warming. Utilizing these thresholds, the estimated GHG emissions for the SMP194R1 operations and activities including vehicle travel would not exceed the CAP or the SCAQMD GHG thresholds and will not significantly impact global warming/climate change. Therefore, the impact will be less than significant. Note that air quality measures to reduce exhaust emissions and idling of vehicles under Section 6 above will also reduce CO₂ emissions. These include the following measures:

- All equipment is maintained and tuned according to manufacturer’s specifications;
- Production is scheduled to minimize daily equipment operations and idling trucks;
- During operations, trucks and vehicles in loading and unloading queues will have their engines turned off when not in use for more than five minutes to reduce idling and vehicle emissions. *(Note that this reduced idling limitation measure is required under Title 13, California Code of Regulations, Section 2485 Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. The on-site operator supervises vehicles that access the site for loading and unloading and off-road trucks and equipment to comply with this regulation); and*
- Compliance with all existing and future CARB and SCAQMD regulations related to diesel-fueled trucks and equipment, which may include among others: (1) meeting more stringent emission standards; (2) retrofitting existing engines with particulate traps; (3) use of low sulfur fuel; and (4) use of alternative fuels or equipment.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Table 2¹
Greenhouse Gas Emissions
SMP 194R1 Activities - Annual Emissions (MTCO₂e)

Source/Phase	CO ₂	CH ₄	N ₂ O
Onsite Equipment	250.8	46.4	negl
On-site Vehicles	6.1	negl	negl
Off-site Vehicles	612.0	0.2	negl
Electrical Usage	147.8	0.2	0.4
Total MTCO₂e per year	1063.7		
CAP Threshold for Small Projects	3,000		
CAP Significant	No		
SCAQMD Industrial Threshold	10,000		
SCAQMD Significant	No		

Source: Updated Air Quality and Greenhouse Gas Assessment for Dillon Road Mine SMP No. 194R1, Lilburn Corp. January 2018

¹ Refer to Appendix A tables in source document above.

MTCO₂e - metric tons of carbon dioxide equivalent

CO₂e – CH₄ x 25; N₂O x 598

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

HAZARDS AND HAZARDOUS MATERIALS Would the project:

21. Hazards and Hazardous Materials

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Dillon Road Mine SMP No. 194R1 Application, California Department of Toxic Substances Control EnviroStor database, and County Dept. of Environmental Health

Findings of Fact:

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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a) **No Impact.** Regular maintenance of equipment and fuel, oil and grease will be stored and dispensed using a lube and fuel truck. If above ground fuel tanks are used on-site, appropriate regulations will be implemented to capture and control fuels in the event of an accidental spill. The operator is required to comply with all federal, state and County regulations and to submit a Hazardous Material Business Emergency Plan to the County Dept. of Environmental Health, Hazardous Material Management Branch, the acting Certified Uniform Program Agency (CUPA). The Plan includes a hazardous material inventory, emergency procedures, spill prevention and control measures and Best Management Practices (BMPs) to ensure that on-site materials are used, stored appropriately, and contained and cleaned up in the event of uncontrolled release.

SMP194R1 does not anticipate creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. No blasting nor blasting materials will be used or stored on-site. The project will have no impact with compliance with existing regulations.

b) **No Impact.** SMP194R1 does not anticipate creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment as mining activities will not require the use of hazardous materials. The project will have no impact with compliance with existing regulations.

c) **No Impact.** Adequate access to the Project Site will be available by a 24-foot wide paved driveway via Dillon Road. SMP194R1 will not encroach onto public right-of-way and therefore will not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan. The project will have no impact.

d) **No Impact.** SMP194R1 does not include the emission of hazardous material or handling of hazardous or acutely hazardous materials, substances, or waste. The nearest school is Amistad High School, located approximately six miles south of the Project Site and south of I-10. The project will have no impact with compliance with existing regulations.

e) **No Impact.** SMP194R1 is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 as demonstrated by the California Department of Toxic Substances Control EnviroStor database (accessed on December 7, 2017). The project will have no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

22. Airports	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Result in an inconsistency with an Airport Master Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require review by the Airport Land Use Commission?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riverside County General Plan Figure S-20 "Airport Locations," GIS database

Findings of Fact:

a-d) **No Impact.** According to Riverside County General Plan Figure S-20 "Airport Locations," the nearest airport is the Bermuda Dunes Airport, located approximately 6.5 miles southwest of the Project Site. Additionally, according to the Riverside County's Map My County (GIS database), the Project Site is not located within an Airport Master Plan, an airport land use of safety hazard area, or a private airstrip. The project will have no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

HYDROLOGY AND WATER QUALITY Would the project:				
23. Water Quality Impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in substantial erosion or siltation on-site or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source(s): Riverside County Flood Control District Flood Hazard Report/Condition, Dillon Road Mine SMP No. 194R1 Application, EA 36858/MND, 1995 Hydrology Report

Findings of Fact:

a) **No Impact.** The Proposed Project will not violate any water quality standards or waste discharge requirements as no wastewater will be produced or discharged. Therefore, no impact is expected.

b) **Less than Significant Impact.** The estimated groundwater depth at the Project Site is approximately 150 feet. The mining depth is planned at 100 feet; therefore, SMP194R1 will not expose groundwater. There are no water sources available on or adjacent to the site. Water is transported to the site daily as needed by means of a 4,000-gallon water truck (typical size). Water is obtained from the Coachella Valley Water District via hydrants at their direction. The project is expected to use an average of 8,000 gallons per operational day or approximately 3 acre-feet per year for dust control within the plant and water sprayed on roads and active operations areas as needed to limit blowing dust. A portable construction type water tank may be set up on-site sized to meet road and process plant dust control and fire protection as needed.

In the event that concrete aggregate products are washed on-site, water usage could increase to approximately 10 acre-feet per year based on 200,000 tpy and approximately 5 gallons/ton per hour; 125 tons/hour; and 60% recycled with a filter or belt press or similar equipment. The recycled or “waste water” will be used for dust control or washing. The Coachella Valley Water Management Plan (WMP) 2010 Update (2012) estimated 2019 water usage at approximately 700,000 acre-feet per year. The revised project’s usage is minimal compared to the Water District demand and supply.

Additionally, SMP194R1 is anticipated to provide water for employees as necessary. SMP194R1 will not substantially change the water usage previously approved, deplete groundwater supplies or interfere substantially with groundwater recharge. The proposed revision will have a less than significant impact.

c) **Less than Significant Impact.** The Project Site sits in the West Berdoo canyon within an alluvial fan. The upstream area to the north and east is hilly, known as the Little San Bernardino Mountains, and there is no development. A “Hydrology Report” was prepared by Don Berg in July 1995 and EA 36858/MND addressed the potential runoff flows and possible head cut erosion that could be caused by the pit slopes. It was determined and agreed by the Riverside County Flood Control and Water Conservation District that the gentle 4H:1V slopes and the 325-foot set back would be adequate to minimize the potential head cut erosion that could occur off-site.

SMP194R1 does not propose any changes to the previously approved pit design nor changes to the existing drainage patterns. Flows which enter the site will be allowed to flow over a gentle 4H:1V slope and enter the two percent bottom area where it will be temporarily retained or slowed allowing some of the storm water to infiltrate into the ground. With the flow traversing the majority of the Project Site in a sheet flow condition over a relatively flat grade, the flow should leave the site in a less erodible manner than it currently does. If future flows entering the site define a flow course, a shallow channel will be designed into the 4:1 slope with a 1/2 -ton rock stabilizer at the top and 1/2-ton rock energy dissipater at the bottom to control and spread the flow as it enters the two percent bottom area. The pit design would minimally decrease the peak flow but not alter the patterns of storm runoff when compared to pre-use conditions. Therefore, SMP194R1 will not substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner that would result in

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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substantial erosion or siltation on- or off-site. The project will have a less than significant impact with compliance with project design.

d) **Less than Significant Impact.** Water erosion will be minimized by the 325-foot setback on the north and east to limit any off-site head-cut erosion and by implementation of the Storm Water Pollution Prevention Plan (SWPPP). Typical measures to control erosion include the creation of earthen and hard-faced ditches, remedial grading, revegetation, and supplemental sand bagging and placement of straw bales. The Project Site will be visually inspected after major precipitation events to determine if any substantial erosion is evident such as sheet, rill or gully erosion or any surficial instability. Appropriate erosion control measures will be implemented where erosion is observed. The inspection for erosion and the maintenance of drainage/erosion control measures will be in conformance with the SWPPP. Therefore, the impact will be less than significant.

e) **No Impact.** According to Riverside County General Plan Figure S-9 “Special Flood Hazard Areas,” the Project Site is in a flood hazard area. SMP194R1, however, will only place temporary material and structures (non-habitable) within the mine pit. Therefore, SMP194R1 will not place structures which would impede or redirect flood flows within a flood hazard area. Furthermore, SMP No. 194R1 pit design would minimally decrease the peak flow but not alter the patterns of storm runoff when compared to pre-use conditions. Less than significant impacts are anticipated, and no mitigation measures are required. SMP194R1 does not propose any changes to the previously approved pit design nor changes to the existing drainage patterns. Flows which enter the site will be allowed to flow over a gentle 4H:1V slope and enter the two percent bottom area where it will be temporarily retained or slowed allowing some of the storm water to infiltrate into the ground. With the flow traversing the majority of the Project Site in a sheet flow condition over a relatively flat grade, the flow should leave the site in a less erodible manner than it currently does. If future flows entering the site define a flow course, a shallow channel will be designed into the 4:1 slope with a 1/2 -ton rock stabilizer at the top and 1/2-ton rock energy dissipater at the bottom to control and spread the flow as it enters the two percent bottom area.

Therefore, SMP194R1 will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Additionally, SMP194R1 will not result in a change of absorption rate or the rate and amount of surface runoff in a way that would have negative impacts to the surrounding area. The project will have no impact.

f) **Less than Significant Impact.** SMP194R1 anticipates that any runoff water produced on-site would generally remain on-site and evaporate or percolate into the ground; therefore, will have no impact on the off-site drainage systems. Additionally, SMP194R1 does not propose any changes to the previously approved pit design nor changes to the existing drainage patterns. Therefore, the impact will be less than significant with compliance with project design.

g) **Less than Significant Impact.** According to Riverside County General Plan Figure S-9 “Special Flood Hazard Areas,” the Project Site is in a flood hazard area. SMP194R1, however, will only place temporary material and structures (non-habitable) within the mine pit. Therefore, SMP194R1 will not place structures which would impede or redirect flood flows within a flood hazard area. Furthermore, the Dillon Road Mine SMP No. 194R1 pit design would minimally decrease the peak flow but not alter the patterns of storm runoff when compared to pre-use conditions. Therefore, the impact will be less than significant with compliance with project design.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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h) **No Impact.** SMP194R1 is not anticipated expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam because the Project Site is not within an area susceptible to the impacts of the failure of a levee or dam as shown on Figure S-10 “Dam Failure Inundation Zones” of the Riverside County General Plan. The project will have no impact.

i) **No Impact.** SMP194R1 does not propose any changes to the previously approved pit design nor changes to the existing drainage patterns. It was determined and agreed by the Riverside County Flood Control and Water Conservation District that the gentle 4H:1V slopes and the 325-foot set back would be adequate to minimize the potential head cut erosion that could occur off-site. The revised project’s usage is minimal compared to the Water District demand and supply. The project will have a less than significant impact with compliance with project design

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

LAND USE/PLANNING Would the project:

24. Land Use

a) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

b) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?

Source(s): Riverside County General Plan Land Use Element, Staff review, GIS database

Findings of Fact:

a) **No Impact.** The Project Site is in an area designated for Open Space Mineral Resources (OS-MIN). The General Plan notes that the OS-MIN land use designation is for mineral extraction and processing facilities, and areas held in reserve for future mineral extraction and processing. As such, SMP194R1 shall comply with the OS-MIN land use policies outlined in the County of Riverside General Plan. Therefore, SMP194R1 is consistent with the land use designations and policies of the General Plan. The project will have no impact.

b) **No Impact.** SMP194R1 will not disrupt or divide the physical arrangement of an established community as the surrounding properties are not developed and no such community exists within the immediate vicinity of the Project Site. The project will have no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

MINERAL RESOURCES Would the project:

25. Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?				
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riverside County General Plan Figure OS-6 “Mineral Resources Area”, Dillon Road Mine SMP No. 194R1 Application

Findings of Fact:

a,b) **No Impact.** No changes to production are requested; planned production will remain at an average of 100,000 tons per year (tpy) and occasionally a maximum of 200,000 tpy as previously approved. The proposed project will continue to operate as needed to meet demand for the on-site aggregate crushing/screen plant as previously approved. The mine is expected to produce aggregate on an on-demand basis to meet mainly construction projects.

As concluded in EA 36858/MND and confirmed by Riverside County General Plan Figure OS-6 “Mineral Resources Area,” the area proposed for surface mining on the Project Site is located in an area that is designated by the State as Regionally Significant Aggregate Resource Areas (MRZ-2). Although SMP194R1 will inherently include the loss of availability of mineral resources as mining occurs, the use of these mineral resources will benefit the overall development of the region. The project will have no impact.

c) **No Impact.** To protect people or property from potential hazards while the mine is operational as well as idle, the Project Site is fenced within property lines with a five-foot high, three-strand wire fence posted with “No Trespassing” signs every 400 feet on the north, east, and south. Six-foot high chain link fence with “No Trespassing” signs every 200 feet is aligned along the west boundary east of Dillon Road. With maintenance of existing fencing, SMP194R1 is not expected to expose people or property to hazards. The project will have no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

NOISE Would the project result in:				
26. Airport Noise				
a) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source(s): Riverside County General Plan Figure S-20 “Airport Locations,” County of Riverside Airport Facilities Map

Findings of Fact:

a,b) **No Impact.** The nearest airport is the Bermuda Dunes Airport, located approximately 6.5 miles southwest of the Project Site and the Project Site is not located within an Airport Master Plan nor near a private airstrip. Therefore, SMP194R1 would not expose people residing or working in the project area to excessive noise levels. The project will have no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

27. Noise Effects by the Project	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riverside County General Plan, EA 36858/MND, Table N-1 (“Land Use Compatibility for Community Noise Exposure”); Dillon Road Mine SMP No. 194R1 Application

Findings of Fact:

a) **Less than Significant Impact.** SMP194R1 is not anticipated to increase or create any new noise sources or levels not previously approved or assessed in the 1995 EA and approved project. The nearest residences are located approximately 1.25 miles northwest of the Project Site and west of Dillon Road. Distance. The site is in an M-R-A zone that anticipates mining and manufacturing that produces higher noise levels. No new residences have been built closer to the site.

The County’s General Plan Noise Element (Chapter 7) lists the stationary source land use noise exterior standards as 65 Leq (10 minute) from 7:00 a.m. to 10:00 p.m. and 45 Leq (10 minute) from 10:00 p.m. to 7:00 a.m. Operational hours for the plant are from 6 a.m. to 10 p.m. The following assessment demonstrates that the ongoing activities associated with SMP194R1 will not generate noise at the residences located at least 1.25 miles to the northwest that would exceed the noise thresholds above.

Outdoor sound levels decrease logarithmically as the distance from the source increases. As the sound waves travel away from the source, the sound energy is dispersed over a greater area. This spreading of the sound wave or energy from a source reduces the noise level at a rate of 6 dB per doubling of distance. This formula is called the Inverse Square Law of Noise Propagation.

The noise model is based on a direct line-of-sight, that is, that there is nothing blocking the noise source from the receptor. Noise barriers, in this case the pit slopes as well as the overall increase in height towards the northwest, does not allow direct line-of-sight from the plant site to the residences. Typically,

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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barriers that block the line of sight provide between 5 to 10 dBA of noise reduction. Based on the existing and future pit conditions, the pit walls would provide an average of -7.5 dBA reduction in noise levels.

Noise levels referenced in past noise studies and by the Federal Highway Administration Construction Noise Model (FHWA 2006) has documented that a plant site generates about 91 dBA at a distance of 50 feet. Mobile equipment and trucks create a noise level of 79 dBA at 50 feet. To be conservative, we used the higher value of 91 dBA for the noise source (noise levels are not additive) and incorporated the estimated 7.5 dB noise reduction as discussed above. Table 3 below shows the noise level decrease of 6 dB per doubling of distance from the plant site.

The assessment shows that noise levels for processing would be less than the 65 dBA threshold levels for daytime hours at distances greater than approximately 400 feet as well as below the 45 Leq for the one hour between 6 a.m. and 7 a.m. at residences about 4,800 feet away.

**Table 3
Noise Level Decrease with Distance**

Distance to Residence (feet)	Noise Source and Level (dB)
	Crusher (processing)
50	91
Minus pit wall barrier of 7.5 dBA	83.5
100	77.5
200	71.5
400	65.5
800	59.5
1,600	53.5
3,200	47.5
4,800	44.5
6,400 (1.21 miles)	41.5

Total estimated noise reduction = 7.5 dBA
Nearest residences – 1.25 miles

SMP194R1 is not anticipated to result in a substantial permanent increase in ambient noise levels in the project vicinity above existing levels. The 1995 SMP and EA conditions restrict operational hours and require the aggregate process plant to be located in the center of the Project Site within the pit approximately 400 feet from Dillon Road, for which distance and pit walls will reduce and shield noise (see Conditions 4.6 and 4.19 below). Also, the elimination of the asphalt batch plant will reduce noise levels. Furthermore, no mine-related blasting is planned. Therefore, the impact will be less than significant with compliance with project conditions and mitigation measures and with adherence to the applicable policies listed within the Noise Element section of the General Plan.

ADOPTED CONDITIONS / MITIGATION MEASURES FROM 1995 SMP AND EA/MND

- 4.6 All uses shall confine operations on the property, other than maintenance or emergencies, to the hours between 6:00 AM and 10:00 PM, except those operations that are located not less than 300 feet from the outer boundary of the property. Operations shall be prohibited on Sundays and Federally recognized holidays.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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4.19 Permanent structures or other office or maintenance facilities, other than portable processing equipment shall be allowed on the property only in the locations delineated on the Mining Plan, Exhibit A, Amended No. 1. Modifications to the locations and/or type of structures shall require the granting of a substantial conformance or revised permit in accordance with Riverside County Ordinance No. 555. (Amended by Planning Commission, 8-2-95)

b) **No Impact.** SMP194R1 is not anticipated to generate any new ground-borne vibration or ground-borne noise levels that weren't already anticipated with the 1995 approved project. The nearest residences are located approximately 1.25 miles northwest of the Project Site and west of Dillon Road. With the removal of the asphalt batch plant, less ground-borne vibration or ground-borne noise levels are anticipated. The project will have no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

PALEONTOLOGICAL RESOURCES:

28. Paleontological Resources

a) Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Source(s): Riverside County General Plan Figure OS-8 "Paleontological Sensitivity"

Findings of Fact:

a) **No Impact.** The Project Site is in an area which is deemed to have a low potential for paleontological sensitivity. The 1995 EA 36858/MND determined the Existing Project would have "no impact" related to paleontological resources.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

POPULATION AND HOUSING Would the project:

29. Housing

a) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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b) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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c) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source(s): GIS database, Riverside County General Plan Housing Element, and Dillon Road Mine SMP No. 194R1 Application

Findings of Fact:

a-c) **No Impact.** The existing and proposed SMP194R1 is not located within a land use that is designated for housing; housing does not exist on the Project Site and therefore will displace housing or people; will not create a demand for additional housing as permanent employment opportunities are limited; is not located within or in the vicinity of a County Redevelopment Project Area; and will not create population increases or growth. The project will have no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

PUBLIC SERVICES Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

30. Fire Services

Source(s): Riverside County General Plan

Findings of Fact:

a) **No Impact.** SMP194R1 would not cause in an increase in housing or population which requires an increased need for fire services compared to the existing land use. The project will have no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

31. Sheriff Services

Source(s): Riverside County General Plan

Findings of Fact:

a) **No Impact.** SMP194R1 would not cause in an increase in housing or population which requires an increased need for sheriff services compared to the existing land use. The project will have no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

32. Schools

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source(s): School District correspondence, GIS database

Findings of Fact:

a) **No Impact.** SMP194R1 would not cause in an increase in housing or population which requires an increased need for schools compared to the existing land use. The project will have no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

33. Libraries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Source(s): Riverside County General Plan

a) **No Impact.** SMP194R1 would not cause in an increase in housing or population which requires an increased need for library services compared to the existing land use. The project will have no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

34. Health Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Source(s): Riverside County General Plan

Findings of Fact:

a) **No Impact.** SMP194R1 would not cause in an increase in housing or population which requires an increased need for health services compared to the existing land use. The project will have no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

RECREATION Would the project:				
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35. Parks and Recreation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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a) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

b) Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

c) Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source(s): GIS database, EA 36858/MND

Findings of Fact:

a-c) **No Impact.** The existing project and the proposed SMP194R1 do not include the construction or expansion of recreational facilities or facilities which might have an adverse physical effect on the environment; would not cause in an increase in housing or population which requires an increased need for recreational facilities; and is not located within a County Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees). The project will have no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

36. Recreational Trails	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Include the construction or expansion of a trail system?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riv. Co. 800-Scale Equestrian Trail Maps, Open Space and Conservation Map for Western County trail alignments

Findings of Fact:

a) **No Impact.** According to Riverside County’s Map My County (GIS database), the Project Site is not located within the path or in the vicinity of any recreational trails and does not include the construction or expansion of a trail system. The project will have no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

TRANSPORTATION Would the project:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
37. Transportation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Cause an effect upon, or a need for new or altered maintenance of roads?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Cause an effect upon circulation during the project’s construction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Result in inadequate emergency access or access to nearby uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riverside County General Plan, GIS database, EA 36858/MND, Dillon Road Mine SMP No. 194R1 Application

Findings of Fact:

a,b) **Less than Significant Impact.** SMP194R1 does not request any increases to the existing mine production and shipping previously approved in 1995. The approved and continuing truck route is Dillon Road southerly to I-10 and into the Coachella Valley region as needed.

A typical production day would amount to around 40 daily truck trips (one way) hauling 25 tons per truck with an additional 10 vehicle trips for employees and delivery trucks. On occasion when production could peak at 200,000 tpy for a construction project, truck traffic could double up to 80 truckloads per day. This is the same truck volumes as approved in 1995.

The 1995 conditions 2.1 and 3.7 listed below were required to mitigate any traffic impacts and included payment of TUMF and signal mitigation fees, resurfacing the acceleration and deceleration lanes on Dillon Road, and providing a driveway 24-feet wide extending not less than 100 feet from Dillon Road. SMP194R1 would not conflict with an applicable plan, ordinance or policy establishing a measure of effectiveness for the performance of the circulation system and similarly would not conflict with an applicable congestion management program. Therefore, the impact will be less than significant with compliance with existing conditions.

ADOPTED CONDITIONS / MITIGATION MEASURES FROM 1995 SMP AND EA/MND

- 2.1 The permittee shall comply with the requirements set forth in the County Transportation Department's letter date August 30, 1995. (Amended by Planning Commission, 8-2-95). (These include payment of TUMF and signal mitigation fees and resurfacing the acceleration and deceleration lanes on Dillon Road, and providing a driveway 24 feet wide extending not than 100 feet from Dillon Road.)
- 3.7 Prior to the issuance of any special inspection permits, grading permits or surface disturbance, the permittee shall first obtain permits and/or clearance from among other agencies, the County Transportation Department.

c,d) **Less than Significant Impact.** The 1995 approval required repaving of the acceleration and deceleration lanes on Dillon Road and providing a driveway 24-feet wide extending not less than 100 feet from Dillon Road. SMP194R1 does not request any increases to the existing trucking volumes shipping previously approved in 1995. Therefore, SMP194R1 would not create any new hazardous design features or new road maintenance besides what is already conditioned. Therefore, the impact will be less than significant with compliance with existing conditions.

e,f) **No Impact.** SMP194R1 does not include a traditional construction phase associated with typical infrastructure developments; will not to result in inadequate emergency access or access to nearby uses; and will not conflict with adopted policies, plans or programs regarding public transit, bikeways or pedestrian facilities. Therefore, the project will have no impact.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

38. Bike Trails

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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a) Include the construction or expansion of a bike system or bike lanes?

Source(s): Riverside County General Plan, Dillon Road Mine SMP No. 194R1 Application

Findings of Fact:

a) **Less than Significant Impact.** The proposed revision does include the construction or expansion of a bike system. According to General Plan’s Figure C-6 “Riverside County Trails and Bikeway System,” Dillon Road is designated as a Combination Trail (Regional Trail/Class I Bike Path). Operations will not directly impact the proposed trail alignment as the site is set off the road right-of way. It has not been determined which side of Dillon Road could have a bike lane. When the bike route is constructed, the operator shall be conditioned to construct appropriate warning signs for truck drivers that bicyclists/hikers may be utilizing said trail and for bicyclists/hikers that trucks will be entering and exiting the site’s driveway at the direction of County Transportation. Existing Condition 4.6 also restricts operations on Sundays and holidays. No new impacts to the proposed circulation/bike trail system are anticipated. Therefore, the impact will be less than significant.

ADOPTED AND NEW CONDITION

4.6 All uses shall confine operations on the property, other than maintenance or emergencies, to the hours between 6:00 AM and 10:00 PM, except those operations that are located not less than 300 feet from the outer boundary of the property. Operations shall be prohibited on Sundays and Federally recognized holidays.

NEW CONDITION: When the bike route is constructed and at the direction of County Transportation Dept., the operator shall construct appropriate warning signs for truck drivers that bicyclists/hikers may be utilizing said trail and for bicyclists/hikers that trucks will be entering and exiting the site’s driveway.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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TRIBAL CULTURAL RESOURCES Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
39. Tribal Cultural Resources	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): EA 36858/MND, Dillon Road Mine SMP No. 194R1 Application

Findings of Fact:

a,b) **Less than Significant Impact.** In compliance with Assembly Bill 52 (AB52), notices regarding this project were mailed to all the tribes within the project’s vicinity on February 5, 2018. The Twenty-Nine Palms Band of Mission Indians, Soboba Band of Luiseño, Morongo Band of Mission Indians, and the Ramona Band of Cahuilla Indians responded with a requested to monitoring during the grading process.

Letters were received by the County in response to the AB52 notifications by the tribes; Soboba Band of Luiseño and Ramona Band of Cahuilla Indians on February 6, 2018. A request to consult was received from the tribes; Twenty-Nine Palms Band of Mission Indians on February 14, 2018. Twenty-Nine Palms Band of Mission Indians requested cultural reports on February 14, 2018. A request to consult was received from the Morongo Band of Mission Indians on February 12, 2018. Morongo Band of Mission Indians requested a records search.

No Tribal Cultural resources were identified on the site. Consultation with the tribes; Twenty- Nine Palms Band of Mission Indians, Soboba Band of Luiseño, Morongo Band of Mission Indians, and the Ramona Band of Cahuilla Indians was formally concluded on March 5, 2018.

Based upon analysis of records and a survey of the property by the County Archaeologist, it has been determined that there will be no impacts to significant cultural historic resources as defined in California Code of Regulations, Section 15064.5 because they do not occur on the project site. An Archaeologist and Tribal Monitor will be present to ensure any unanticipated resources are managed according to procedures identified in the Cultural Resources Management Plan (CRMP). The project shall comply with the conditional of approval for unanticipated resources. Therefore, the impact will be less than significant.

Mitigation: No mitigation is required.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Monitoring: No monitoring is required.

UTILITIES AND SERVICE SYSTEMS Would the project:

40. Water	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Department of Environmental Health Review, GIS database, Dillon Road Mine SMP No. 194R1 by Lilburn Corporation dated June 2017.

Findings of Fact:

a,b) **Less than Significant Impact.** The Project Site is located within the Coachella Valley Water District (CVWD) service area. However, as stated by the Dillon Road Mine SMP No. 194R1, there are no water sources available on or adjacent to the Project Site. Water is obtained from CVWD via hydrants at their direction. SMP194R1 is expected to use an average of 8,000 gallons per operational day for dust control or approximately three acre-feet per annum. A portable construction type water tank may be set up on-site, sized to meet road and process plant dust control and fire protection as needed.

In the event that concrete aggregate products are washed on-site, water usage could increase to approximately 10 acre-feet per year based on 200,000 tpy and approximately five gallons/ton per hour; 125 tons/hour for washing; and 60% recycled with a filter or belt press or similar equipment.

Additionally, no changes to production are requested by SMP194R1; the mine will continue to operate as needed to meet demand for the on-site aggregate crushing/screen plant as previously approved. Therefore, SMP194R1 is not anticipated to require increased water use from what has already been approved and will not require or result in the construction of new water treatment facilities. The Coachella Valley WMP 2010 Update (2012) estimated 2019 water usage at approximately 700,000 acre-feet per year. The revised project's usage is minimal compared to the Water District demand and supply. Therefore, the impact will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

41. Sewer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Department of Environmental Health Review, Dillon Road Mine SMP No. 194R1 Application

Findings of Fact:

a,b) **No Impact.** SMP194R1 will include the temporary use of portable toilets as necessary. Therefore, SMP194R1 will not require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities or require a determination by the wastewater treatment provider that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. No impacts will occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

42. Solid Waste	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riverside County General Plan, Riverside County Waste Management District correspondence, EA 36858/MND, Dillon Road Mine SMP No. 194R1 Application

Findings of Fact:

a,b) **No Impact.** SMP194R1 is not expected to generate any waste material; but rather will use all products mined from the Project Site and will process them all into construction products. Any unusable material will be graded back into the toe of the slope or on the pit floor. The operator will contract for an on-site waste bin for domestic-type waste. SMP194R1 will not have increased solid waste disposal needs, will not need to be served by a landfill, and will comply with applicable regulations. The project will have no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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43. Utilities

Would the project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?

a) Electricity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Natural gas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Communications systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Street lighting?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Maintenance of public facilities, including roads?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Other governmental services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): GIS database, EA 36858/MND, Dillon Road Mine SMP No. 194R1 Application

Findings of Fact:

a) **No Impact.** According to the Dillon Road Mine SMP No. 194R1, the Project Site has commercial electrical power from Southern California Edison. The existing local electrical power will be used on-site for a truck scale, scale house, and temporary construction trailer or quality control trailer. SMP194R1 would not require the construction or expansion of existing electrical facilities, the construction of which could cause significant environmental effects. Therefore, the project will have no impact.

b,c) **No Impact.** SMP194R1 does not require the use of utility services in the form of natural gas or communications systems. Therefore, SMP194R1 would not require the construction or expansion of existing natural gas or communication facilities, the construction of which could cause significant environmental effects. The project will have no impact.

d) **No Impact.** As discussed in Section 24(d), SMP194R1 anticipates that any runoff water produced on-site would remain on-site and therefore have no impact on the off-site drainage systems. Additionally, SMP194R1 does not propose any changes to the previously approved pit design nor changes to the existing drainage patterns. Therefore, SMP194R1 would not require the construction or expansion of existing storm water drainage facilities, the construction of which could cause significant environmental effects. The project will have no impact, and no mitigation measures are required.

e) **No Impact.** SMP194R1 is not anticipated to require any adjustment to the existing street lighting. The project will have no impact, and not mitigation measures are required.

f) **No Impact.** SMP194R1 is not anticipated to be correlated with an increased use of public facilities. Additionally, as discussed in Section 43(a, b), the approved and continuing truck routes all utilize Dillon Road southerly to I-10 and into the City of Indio. Therefore, SMP194R1 is not anticipated to require maintenance of public facilities, including roads, which could cause significant environmental effects. The project will have no impact, and no mitigation measures are required.

g) **No Impact.** SMP194R1 is not anticipated to require additional government services. The project will have no impact, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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WILDFIRE If located in or near a State Responsibility Area (“SRA”), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the project:

44. Wildfire Impacts

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Riverside County General Plan Figure S-11 “Wildfire Susceptibility,” GIS database

Findings of Fact:

a) **No Impact.** Adequate access to the Project Site will be available by a 24-foot wide paved driveway via Dillon Road. SMP194R1 will not encroach onto public right-of-way and therefore will not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan. The project will have no impact.

b) **Less than Significant Impact.** According to Riverside County “Map My Parcel” reports, the project site is not located in a fire hazard zone or within a Fire Responsibility Area 1. The project site is sparsely vegetated desert lands which will be cleared of vegetation during mining. SMP194R1 is not anticipated expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors that could exacerbate wildfire risks.

c) **No impact.** The proposed revision does require any new infrastructure that may exacerbate fire risk. No impact is expected.

d,e) **Less than Significant Impact.** According to Riverside County “Map My Parcel” reports, the project site is not located in a fire hazard zone or within a Fire Responsibility Area 1. The project site is sparsely vegetated desert lands which will be cleared of vegetation during mining. The closest residence is over 1.25 miles to the northwest and the proposed revision activities will not expose people or structures to a significant risk of loses, injury, or death involving wildland fires. The project’s operations are required to comply with requirements included in County of Riverside Ordinance No. 787 (California Fire Code)

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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and County Fire Department regulations per Condition of Approval 3.7. Therefore, the impact will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required

MANDATORY FINDINGS OF SIGNIFICANCE Does the Project:

45. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Source(s): Staff review, SMP 194R1 Application

Findings of Fact: **Less than Significant Impact with Mitigation Incorporated.** Implementation of SMP194R1 would not substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife populations to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. Implementation of existing conditions and the Biological Resources mitigation measures BIO-1, 2, and 3 would ensure impacts to biological resources are mitigated to less than significant levels. As discussed in Section 9 (Archaeological Resources), the revised project and site would not impact any historical or cultural resources. However, implementation of the proposed revision could uncover such materials during operations. Implementation of standard conditions CR-1 and 2 would protect any accidental discoveries. Therefore, the proposed revision would not substantially degrade the quality of the environment with mitigation incorporated.

46. Have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects and probable future projects)?

Source(s): Staff review, SMP 194R1 Application

Findings of Fact: **Less than Significant Impact with Mitigation Incorporated.** The project does not have impacts which are individually limited, but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. These impacts can result from a combination of the proposed revision together with other projects causing related impacts. The proposed revision is the time extension and a 6.6-acre land expansion of an existing mining project in which all operational and production parameters including

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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truck traffic are unchanged. Cumulative projects include approximately five other mining operations to the south all located within County land use designations and zoning for mine operations. Each project is required to implement regulations, conditions and mitigation measures to limit cumulative impacts. Since the proposed revision is a minor change to its area and does not produce any new environmental impacts not previously assessed and will implement conditions and mitigation measures to minimize environmental impacts, the proposed revision would not contribute substantially to cumulative impacts on any resource. These impacts are not considered cumulatively considerable with mitigation incorporated.

47. Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Source(s): Staff review, SMP 194R1 Application

Findings of Fact: **Less than Significant Impact with Mitigation Incorporated.** SMP194R1 would not result in environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly. The site is not located near any sensitive receptors and implementation of conditions and mitigation measures required above would ensure the proposed revision would have a less than significant impact on human beings including impacts from air quality, geologic hazards, hazardous materials, and noise.

VI. EARLIER ANALYSES

Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration as per California Code of Regulations, Section 15063 (c) (3) (D). In this case, a brief discussion should identify the following:

Earlier Analyses Used, if any:

SMP 194, EA 36858/MND approved and adopted by County Planning Commission, August 1995; and its supporting documents and conditions.

Location Where Earlier Analyses, if used, are available for review:

Location: County of Riverside Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92505

VII. AUTHORITIES CITED

Authorities cited: California Environmental Quality Act (CEQA): Public Resources Code Sections 21000-21189 and CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387)

VIII. REFERENCES

The following documents were referred to as information sources during the preparation of this document.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Coachella Valley Multi-Species Habitat Conservation Plan, Riverside County, 2008.

Dillon Road Mine SMP No. 194R1, Lilburn Corporation, November 2018.

Environmental Assessment 36858/Mitigated Negative Declaration for SMP 194, Riverside County Planning, 1995 with associated technical documents.

General Biological Resources Assessment, RCA Associates, December 2017.

GIS database: Riverside County "Map My County," 2019.

Riverside County General Plan, Revised December 8, 2015 with amendments.

SCAQMD Air Quality Management Plan 2016.

SCAQMD CEQA Air Quality Handbook as amended, 2019.

Surface Mining Permit 194 Dillon Road Mine approved by Riverside County Planning Commission with staff report and conditions of approval, 1995.