

Draft Environmental Impact Report
SCH No. 2021030301

Renaissance Ranch Commerce Center

Riverside County, California



Lead Agency
Riverside County
Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501

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Planning Department
4080 Lemon Street, 12th Floor
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General Plan Amendment (GPA 200004)
Amendment No. 1 to Specific Plan No. 333 (SP 333A1)
Change of Zone (CZ 2000016)



TABLE OF CONTENTS

<u>Section Name and Number</u>	<u>Page</u>
S.0 Executive Summary	S-1
S.1 Introduction	S-1
S.2 Project Synopsis	S-2
S.2.1 Location and Regional Setting.....	S-2
S.2.2 Project Objectives.....	S-2
S.2.3 Project Summary Description.....	S-3
S.3 Areas of Controversy and Issues to be Resolved	S-4
S.4 Project Alternatives	S-5
S.4.1 No Development Alternative (NDA)	S-5
S.4.2 No Project (Adopted Specific Plan) Alternative (NPA).....	S-5
S.4.3 Reduced Project Alternative	S-5
S.5 EIR Process	S-6
S.6 Summary of Impacts, Mitigation Measures and Conclusions.....	S-7
S.6.1 Effects Found Not to Be Significant.....	S-7
S.6.2 Impacts of the Proposed Project.....	S-7
1.0 Introduction	1-1
1.1 Purposes of CEQA and Legal Authority for this Program EIR	1-1
1.2 Summary of the Project Evaluated by this Program EIR.....	1-3
1.3 CEQA Process Overview	1-4
1.4 Program EIR Scope, Format, and Content	1-5
1.4.1 Program EIR Scope	1-5
1.4.2 Content and Organization of this Program EIR.....	1-9
1.4.3 Incorporation by Reference	1-11
1.5 Responsible and Trustee Agencies.....	1-13
1.6 Areas of Controversy	1-14
1.7 Issues to be Resolved by the Decision-Making Body	1-14
2.0 Environmental Setting	2-1
2.1 Regional Setting and Location	2-1
2.2 Local Setting and Location	2-1
2.3 Surrounding Land Uses and Development.....	2-1
2.4 Local Planning Context.....	2-5
2.4.1 Connect SoCal (SCAG Regional Transportation Plan/Sustainable Communities Strategy).....	2-5
2.4.2 South Coast Air Quality Management District Air Quality Management Plan (AQMP).....	2-5



TABLE OF CONTENTS (CONT'D)

<u>Section Name and Number</u>	<u>Page</u>
2.4.3 <i>Riverside County General Plan and Elsinore Area Plan</i>	2-6
2.4.4 <i>Renaissance Ranch Specific Plan No. 333 (SP 333)</i>	2-6
2.4.5 <i>Zoning</i>	2-6
2.4.6 <i>Western Riverside County Multiple Species Habitat Conservation Plan</i>	2-9
2.5 Existing Physical Site Conditions	2-11
2.5.1 <i>Land Use</i>	2-11
2.5.2 <i>Site Topography</i>	2-11
2.5.3 <i>Air Quality and Climate</i>	2-11
2.5.4 <i>Biological Resources</i>	2-14
2.5.5 <i>Geology</i>	2-14
2.5.6 <i>Soils</i>	2-15
2.5.7 <i>Hydrology</i>	2-15
2.5.8 <i>Noise</i>	2-16
2.5.9 <i>Transportation</i>	2-16
2.5.10 <i>Public Facilities</i>	2-19
2.5.11 <i>Utilities and Service Systems</i>	2-19
2.5.12 <i>Rare and Unique Resources</i>	2-20
3.0 Project Description.....	3-1
3.1 Regional Setting	3-1
3.2 Project Location and Setting	3-1
3.3 Proposed Project.....	3-1
3.4 Statement of Objectives	3-2
3.5 Project’s Component Parts and Discretionary Approvals.....	3-3
3.5.1 <i>General Plan Amendment No. 2000V04 (GPA200004)</i>	3-3
3.5.2 <i>Change of Zone No. 2000016 (CZ2000016)</i>	3-5
3.5.3 <i>Specific Plan No. 333, Amendment No. 1 (SP00333A01)</i>	3-5
3.6 Project Construction and Operational Characteristics	3-22
3.6.1 <i>Construction Details</i>	3-22
3.6.2 <i>Operational Characteristics</i>	3-23
3.7 Summary of Requested Actions.....	3-25
3.8 Related Environmental Review and Consultation Requirements	3-26
4.0 Environmental Analysis.....	4.0-1
4.0.1 <i>Summary of EIR Scope</i>	4.0-1
4.0.2 <i>Scope of Cumulative Effects Analysis</i>	4.0-1
4.0.3 <i>Identification of Impacts</i>	4.0-7



TABLE OF CONTENTS (CONT'D)

<u>Section Name and Number</u>	<u>Page</u>
4.1 Aesthetics	4.1-1
4.1.1 Existing Conditions.....	4.1-1
4.1.2 Applicable Regulatory Requirements	4.1-5
4.1.3 Basis for Determining Significance	4.1-8
4.1.4 Impact Analysis.....	4.1-9
4.1.5 Cumulative Impact Analysis	4.1-15
4.1.6 Significance of Impacts Before Mitigation	4.1-16
4.1.7 Applicable Regulations, Design Requirements, and Mitigation.....	4.1-17
4.2 Agriculture and Forestry Resources	4.2-1
4.2.1 Existing Conditions.....	4.2-1
4.2.2 Applicable Environmental Regulations	4.2-5
4.2.3 Basis for Determining Significance	4.2-7
4.2.4 Impact Analysis.....	4.2-9
4.2.5 Cumulative Impact Analysis	4.2-11
4.2.6 Significance of Impacts Before Mitigation	4.2-12
4.2.7 Applicable Regulations, Design Requirements, and Mitigation.....	4.2-13
4.2.8 Significance of Impacts After Mitigation.....	4.2-14
4.3 Air Quality	4.3-1
4.3.1 Existing Conditions.....	4.3-1
4.3.2 Applicable Regulatory Requirements	4.3-9
4.3.3 Basis for Determining Significance	4.3-17
4.3.4 Impact Analysis.....	4.3-20
4.3.5 Cumulative Impact Analysis	4.3-42
4.3.6 Significance of Impacts Before Mitigation	4.3-44
4.3.7 Applicable Regulations, Design Requirements, and Mitigation.....	4.3-45
4.3.8 Significance of Impacts After Mitigation.....	4.3-49
4.4 Biological Resources.....	4.4-1
4.4.1 Existing Conditions.....	4.4-1
4.4.2 Applicable Regulatory Requirements	4.4-24
4.4.3 Basis for Determining Significance	4.4-31
4.4.4 Impact Analysis.....	4.4-33
4.4.5 Cumulative Impact Analysis	4.4-45
4.4.6 Significance of Impacts Before Mitigation	4.4-47
4.4.7 Applicable Regulations, Design Requirements, and Mitigation.....	4.4-49
4.4.8 Significance of Impacts After Mitigation.....	4.4-52



TABLE OF CONTENTS (CONT'D)

<u>Section Name and Number</u>	<u>Page</u>
4.5 Cultural Resources	4.5-1
4.5.1 Existing Conditions.....	4.5-1
4.5.2 Applicable Environmental Regulations	4.5-13
4.5.3 Basis for Determining Significance	4.5-20
4.5.4 Impact Analysis.....	4.5-21
4.5.5 Cumulative Impact Analysis	4.5-22
4.5.6 Significance of Impacts Before Mitigation	4.5-23
4.5.7 Applicable Regulations, Design Requirements, and Mitigation.....	4.5-24
4.5.8 Significance of Impacts After Mitigation.....	4.5-27
4.6 Energy	4.6-1
4.6.1 Existing Conditions.....	4.6-1
4.6.2 Applicable Regulatory requirements	4.6-8
4.6.3 Basis for Determining Significance	4.6-11
4.6.4 Impact Analysis.....	4.6-12
4.6.5 Cumulative Impact Analysis	4.6-26
4.6.6 Significance of Impacts Before Mitigation	4.6-26
4.6.7 Applicable Regulations, Design Requirements, and Mitigation.....	4.6-27
4.7 Geology and Soils	4.7-1
4.7.1 Existing Conditions.....	4.7-1
4.7.2 Applicable Environmental Regulations	4.7-5
4.7.3 Basis for Determining Significance	4.7-9
4.7.4 Impact Analysis.....	4.7-11
4.7.5 Cumulative Impact Analysis	4.7-17
4.7.6 Significance of Impacts Before Mitigation	4.7-18
4.7.7 Applicable Regulations, Design Requirements, and Mitigation.....	4.7-19
4.7.8 Significance of Impacts After Mitigation.....	4.7-20
4.8 Greenhouse Gas Emissions	4.8-1
4.8.1 Existing Conditions.....	4.8-1
4.8.2 Applicable Environmental Regulations	4.8-3
4.8.3 Basis for Determining Significance	4.8-17
4.8.4 Impact Analysis.....	4.8-20
4.8.5 Cumulative Impact Analysis	4.8-32
4.8.6 Significance of Impacts Before Mitigation	4.8-32
4.8.7 Applicable Regulations, Design Requirements, and Mitigation.....	4.8-33



TABLE OF CONTENTS (CONT'D)

<u>Section Name and Number</u>	<u>Page</u>
4.8.8 <i>Significance of Impacts After Mitigation</i>	4.8-34
4.9 Hazards and Hazardous Materials.....	4.9-1
4.9.1 <i>Existing Conditions</i>	4.9-1
4.9.2 <i>Applicable Environmental Regulations</i>	4.9-4
4.9.3 <i>Basis for Determining Significance</i>	4.9-9
4.9.4 <i>Impact Analysis</i>	4.9-11
4.9.5 <i>Cumulative Impact Analysis</i>	4.9-14
4.9.6 <i>Significance of Impacts Before Mitigation</i>	4.9-16
4.9.7 <i>Applicable Regulations, Design Requirements, and Mitigation</i>	4.9-17
4.10 Hydrology and Water Quality	4.10-1
4.10.1 <i>Existing Conditions</i>	4.10-1
4.10.2 <i>Applicable Environmental Regulations</i>	4.10-5
4.10.3 <i>Basis for Determining Significance</i>	4.10-11
4.10.4 <i>Impact Analysis</i>	4.10-12
4.10.5 <i>Cumulative Impact Analysis</i>	4.10-20
4.10.6 <i>Significance of Impacts Before Mitigation</i>	4.10-22
4.10.7 <i>Applicable Regulations, Design Requirements, and Mitigation</i>	4.10-23
4.11 Land Use and Planning	4.11-1
4.11.1 <i>Existing Conditions</i>	4.11-1
4.11.2 <i>Applicable Environmental Regulations</i>	4.11-10
4.11.3 <i>Basis for Determining Significance</i>	4.11-16
4.11.4 <i>Impact Analysis</i>	4.11-16
4.11.5 <i>Cumulative Impact Analysis</i>	4.11-23
4.11.6 <i>Significance of Impacts Before Mitigation</i>	4.11-23
4.11.7 <i>Applicable Regulations, Design Requirements, and Mitigation</i>	4.11-24
4.12 Mineral Resources.....	4.12-1
4.12.1 <i>Existing Conditions</i>	4.12-1
4.12.2 <i>Applicable Environmental Regulations</i>	4.12-2
4.12.3 <i>Basis for Determining Significance</i>	4.12-2
4.12.4 <i>Impact Analysis</i>	4.12-3
4.12.5 <i>Cumulative Impact Analysis</i>	4.12-4
4.12.6 <i>Significance of Impacts Before Mitigation</i>	4.12-5
4.12.7 <i>Applicable Regulations, Design Requirements, and Mitigation</i>	4.12-5



TABLE OF CONTENTS (CONT'D)

<u>Section Name and Number</u>	<u>Page</u>
4.13 Noise	4.13-1
4.13.1 Existing Conditions.....	4.13-1
4.13.2 Applicable Environmental Regulations	4.13-9
4.13.3 Basis for Determining Significance	4.13-21
4.13.4 Impact Analysis.....	4.13-24
4.13.5 Cumulative Impact Analysis	4.13-40
4.13.6 Significance of Impacts Before Mitigation	4.13-42
4.13.7 Applicable Regulations, Design Requirements, and Mitigation.....	4.13-43
4.13.8 Significance of Impacts After Mitigation.....	4.13-45
4.14 Paleontological Resources.....	4.14-1
4.14.1 Existing Conditions.....	4.14-1
4.14.2 Applicable Regulatory Requirements	4.14-3
4.14.3 Basis for Determining Significance	4.14-6
4.14.4 Impact Analysis.....	4.14-6
4.14.5 Cumulative Impact Analysis	4.14-7
4.14.6 Significance of Impacts Before Mitigation	4.14-7
4.14.7 Applicable Regulations, Design Requirements, and Mitigation.....	4.14-7
4.14.8 Significance of Impacts After Mitigation.....	4.14-8
4.15 Population and Housing	4.15-1
4.15.1 Existing Conditions.....	4.15-1
4.15.2 Applicable Regulatory Requirements	4.15-2
4.15.3 Basis for Determining Significance	4.15-4
4.15.4 Impact Analysis.....	4.15-5
4.15.5 Cumulative Impact Analysis	4.15-6
4.15.6 Significance of Impacts Before Mitigation	4.15-7
4.15.7 Applicable Regulations, Design Requirements, and Mitigation.....	4.15-7
4.16 Public Services	4.16-1
4.16.1 Existing Conditions.....	4.16-1
4.16.2 Applicable Environmental Regulations	4.16-2
4.16.3 Basis for Determining Significance	4.16-4
4.16.4 Impact Analysis.....	4.16-6
4.16.5 Cumulative Impact Analysis	4.16-10
4.16.6 Significance of Impacts Before Mitigation	4.16-12
4.16.7 Applicable Regulations, Design Requirements, and Mitigation.....	4.16-13



TABLE OF CONTENTS (CONT'D)

<u>Section Name and Number</u>	<u>Page</u>
4.17 Recreation	4.17-1
4.17.1 Existing Conditions.....	4.17-1
4.17.2 Applicable Environmental Regulations	4.17-3
4.17.3 Basis for Determining Significance	4.17-3
4.17.4 Impact Analysis.....	4.17-4
4.17.5 Cumulative Impact Analysis	4.17-5
4.17.6 Significance of Impacts Before Mitigation	4.17-6
4.17.7 Applicable Regulations, Design Requirements, and Mitigation.....	4.17-7
4.18 Transportation	4.18-1
4.18.1 Existing Conditions - Vehicle Miles Travelled	4.18-1
4.18.2 Study Area Description.....	4.18-1
4.18.3 Methodologies for Determining Transportation Effects.....	4.18-3
4.18.4 Existing Conditions.....	4.18-4
4.18.5 Applicable Regulatory Requirements	4.18-7
4.18.6 Basis for Determining Significance	4.18-11
4.18.7 Impact Analysis.....	4.18-13
4.18.8 Cumulative Impact Analysis	4.18-18
4.18.9 Significance of Impacts Before Mitigation	4.18-21
4.18.10 Applicable Regulations, Design Requirements, and Mitigation.....	4.18-22
4.18.11 Significance of Impacts After Mitigation.....	4.18-24
4.19 Tribal Cultural Resources.....	4.19-1
4.19.1 Existing Conditions.....	4.19-1
4.19.2 Regulatory Setting	4.19-1
4.19.3 Basis for Determining Significance	4.19-3
4.19.4 Impact Analysis.....	4.19-3
4.19.5 Cumulative Impact Analysis	4.19-6
4.19.6 Significance of Impacts Before Mitigation	4.19-6
4.19.7 County Regulations, Design Requirements, and Mitigation.....	4.19-6
4.19.8 Significance of Impacts After Mitigation.....	4.19-7
4.20 Utilities and Service Systems.....	4.20-1
4.20.1 Existing Conditions.....	4.20-1
4.20.2 Applicable Environmental Regulations	4.20-3
4.20.3 Basis for Determining Significance	4.20-11
4.20.4 Impact Analysis.....	4.20-13
4.20.5 Cumulative Impact Analysis	4.20-24



TABLE OF CONTENTS (CONT'D)

<u>Section Name and Number</u>	<u>Page</u>
4.20.6 <i>Significance of Impacts Before Mitigation</i>	4.20-26
4.20.7 <i>Applicable Regulations, Design Requirements, and Mitigation</i>	4.20-27
4.21 Wildfire	4.21-1
4.21.1 <i>Existing Conditions</i>	4.21-1
4.21.2 <i>Applicable Regulatory requirements</i>	4.21-5
4.21.3 <i>Basis for Determining Significance</i>	4.21-7
4.21.4 <i>Impact Analysis</i>	4.21-8
4.21.5 <i>Cumulative Impact Analysis</i>	4.21-11
4.21.6 <i>Significance of Impacts Before Mitigation</i>	4.21-12
4.21.7 <i>Applicable Regulations, Design Requirements, and Mitigation</i>	4.21-13
5.0 Other CEQA Considerations	5-1
5.1 Significant Environmental Effects Which Cannot Be Avoided if the Proposed Project is Implemented	5-1
5.2 Significant Irreversible Environmental Impacts Which Would be Involved in the Proposed Action Should it be Implemented.....	5-2
5.3 Growth Inducing Impacts of the Proposed Project	5-3
5.4 Effects Found Not to be Significant During the Initial Study Process.....	5-4
6.0 Alternatives	6-1
6.1 Alternatives Under Consideration.....	6-2
6.1.1 <i>No Development Alternative (NDA)</i>	6-3
6.1.2 <i>No Project (Adopted Specific Plan) Alternative (NPA)</i>	6-3
6.1.3 <i>Reduced Project Alternative (RPA)</i>	6-3
6.2 Alternatives Considered and Rejected	6-4
6.2.1 <i>Alternative Sites</i>	6-4
6.2.2 <i>Air Quality Impact Avoidance Alternative</i>	6-5
6.3 Alternative Analysis.....	6-6
6.3.1 <i>No Development Alternative</i>	6-7
6.3.2 <i>No Project (Adopted Specific Plan) Alternative (NPA)</i>	6-14
6.3.3 <i>Reduced Project Alternative (RPA)</i>	6-22
7.0 References	7-1
7.1 Persons Contributing to EIR Preparation	7-1
7.1.1 <i>County of Riverside Planning Division</i>	7-1
7.1.2 <i>T&B Planning, Inc.</i>	7-1
7.2 Documents Appended to this EIR.....	7-1



TABLE OF CONTENTS (CONT'D)

<u>Section Name and Number</u>	<u>Page</u>
7.3 Documents Incorporated by Reference	7-3
7.4 Documents and Websites Consulted	7-4



LIST OF FIGURES

<u>Figure Number and Title</u>	<u>Page</u>
Figure 2-1	Regional Map.....2-2
Figure 2-2	Vicinity Map2-3
Figure 2-3	Surrounding Land Uses and Development2-4
Figure 2-4	Existing General Plan Land Use Designations2-7
Figure 2-5	Existing Renaissance Ranch Specific Plan Land Use Designations2-8
Figure 2-6	MSHCP Cell Groups and Criteria Cells2-10
Figure 2-7	Aerial Photograph2-12
Figure 2-8	USGS Topographic Map.....2-13
Figure 2-9	Elsinore Area Plan Circulation Plan2-17
Figure 2-10	Elsinore Area Plan Trails and Bikeway System2-18
Figure 3-1	General Plan Amendment No. 2000043-4
Figure 3-2	Specific Plan No. 333A1 Proposed Land Use Plan3-6
Figure 3-3	Proposed Circulation Plan.....3-9
Figure 3-4	Roadway Cross-Sections3-10
Figure 3-5	Roundabout Cross-Sections3-12
Figure 3-6	Conceptual Drainage and Water Quality Plan3-13
Figure 3-7	Conceptual Potable Water Plan3-15
Figure 3-8	Conceptual Recycled Water Plan.....3-17
Figure 3-9	Conceptual Sewer Plan3-19
Figure 3-10	Conceptual Sewer Plan (Alternative).....3-20
Figure 3-11	Conceptual Grading Plan3-21
Figure 4.0-1	Cumulative Development Projects Location Map.....4.0-5
Figure 4.1-1	Site Photograph Key Map4.1-2
Figure 4.1-2	Site Photographs 1 and 2.....4.1-3
Figure 4.1-3	Site Photographs 3 and 4.....4.1-4
Figure 4.1-4	Elsinore Area Plan Scenic Highways.....4.1-6
Figure 4.2-1	FMMP Farmland Map4.2-4
Figure 4.4-1	Vegetation Map.....4.4-4
Figure 4.10-1	Santa Ana River Watershed Map.....4.10-2
Figure 4.10-2	Existing Conditions Hydrology Map4.10-3
Figure 4.10-3	Proposed Conditions Hydrology Map4.10-17



LIST OF FIGURES (CONT'D)

<u>Figure Number and Title</u>		<u>Page</u>
Figure 4.13-1	Common Noise Levels.....	4.13-2
Figure 4.13-2	Project Onsite Source Noise Generation.....	4.13-37
Figure 4.14-1	Paleontological Sensitivity Map	4.14-4
Figure 4.17-1	Existing Local and Regional Parks and Recreation Facilities	4.17-2
Figure 4.18-1	Project Study Area	4.18-2
Figure 4.18-2	Existing Number of Through Lanes and Intersection Controls	4.18-5
Figure 4.21-1	Wildfire Susceptibility	4.21-2



LIST OF TABLES

<u>Table Number and Title</u>	<u>Page</u>
Table S-1	Summary of Impacts, Mitigation Measures, and ConclusionsS-9
Table 1-1	Summary of NOP Comments 1-7
Table 1-2	Location of CEQA Required Topics..... 1-12
Table 2-1	Summary of On-Site Soil Characteristics 2-15
Table 3-1	SP 333A1 Proposed Land Uses 3-7
Table 3-2	Estimated Employment 3-24
Table 3-3	Project Water Demands 3-25
Table 3-4	Estimated Wastewater Generation 3-25
Table 3-5	Matrix of Project Approvals/Permits 3-27
Table 4.0-1	Cumulative Development Land Use Summary 4.0-3
Table 4.3-1	Criteria Air Pollutants – Summary of Common Sources and Effects..... 4.3-3
Table 4.3-2	Summary of Ambient Air Quality Data..... 4.3-8
Table 4.3-3	Attainment Status of Criteria Pollutants in the Western Riverside County Portion of South Coast Air Basin 4.3-8
Table 4.3-4	SCAQMD Regional Significance Thresholds (Pounds per Day) 4.3-18
Table 4.3-5	Localized Significance Thresholds at or within 25 Meters of a Sensitive Receptor..... 4.3-19
Table 4.3-6	Construction-Related Emissions (Regional Significance Analysis)..... 4.3-25
Table 4.3-7	Operational-Related Emissions (Regional Significance Analysis)..... 4.3-27
Table 4.3-8	Construction-Related Emissions (Localized Significance Analysis)..... 4.3-31
Table 4.3-9	Cancer Risk Summary by Pollutant – Construction Activities..... 4.3-32
Table 4.3-10	Non-Carcinogenic Health Risk Summary..... 4.3-33
Table 4.3-11	Project Operational Emissions (Localized Significance Analysis)..... 4.3-34
Table 4.3-12	Cancer Risk Summary by Pollutant – Operational Activities..... 4.3-36
Table 4.3-13	Construction-Related Emissions With Mitigation 4.3-50
Table 4.4-1	Summary of Vegetation/Land Use Types for the Study Area 4.4-3
Table 4.4-2	Summary of Corps Jurisdiction for the Onsite Areas 4.4-14
Table 4.4-3	Summary of Corps Jurisdiction for the Offsite Areas..... 4.4-14
Table 4.4-4	Summary of Regional Board Jurisdiction for the Onsite Areas..... 4.4-17
Table 4.4-5	Summary of Regional Board Jurisdiction for the Offsite Areas..... 4.4-17
Table 4.4-6	Summary of CDFW Jurisdiction for the Onsite Areas 4.4-20
Table 4.4-7	Summary of CDFW Jurisdiction for the Offsite Areas..... 4.4-20



LIST OF TABLES (CONT'D)

<u>Table Number and Title</u>	<u>Page</u>
Table 4.4-8	Summary of Vegetation/Land Use Impacts 4.4-43
Table 4.6-1	Total Electricity System Power (California 2020)..... 4.6-2
Table 4.6-2	SCE 2019 Power Content Mix..... 4.6-4
Table 4.6-3	Construction Equipment Assumptions..... 4.6-13
Table 4.6-4	Construction Electricity Usage 4.6-14
Table 4.6-5	Construction Equipment Fuel Consumption Estimates 4.6-15
Table 4.6-6	Construction Trips and VMT..... 4.6-16
Table 4.6-7	Construction Worker Fuel Consumption Estimates – LDA 4.6-17
Table 4.6-8	Construction Worker Fuel Consumption Estimates – LDT1 4.6-18
Table 4.6-9	Construction Worker Fuel Consumption Estimates – LDT2..... 4.6-18
Table 4.6-10	Construction Vendor Fuel Consumption Estimates – MHDT 4.6-19
Table 4.6-11	Construction Vendor Fuel Consumption Estimates – HHDT..... 4.6-20
Table 4.6-12	Total Project-Generated Traffic Annual Fuel Consumption (All Vehicles)..... 4.6-22
Table 4.6-13	Project Annual Operational Energy Demand Summary 4.6-23
Table 4.8-1	Greenhouse Gases..... 4.8-2
Table 4.8-2	Scoping Plan GHG Reduction Measures Towards 2020 Target..... 4.8-9
Table 4.8-3	Construction-Related Greenhouse Gas Emissions..... 4.8-22
Table 4.8-4	Total Project-Related GHG Emissions 4.8-23
Table 4.8-5	Project Consistency with 2008 CARB Scoping Plan..... 4.8-25
Table 4.8-6	Project Consistency with 2017 CARB Scoping Plan..... 4.8-27
Table 4.10-1	Existing Conditions Hydrology Summary..... 4.10-4
Table 4.10-2	Receiving Waters for Storm Water Runoff from the Project Site 4.10-6
Table 4.10-3	Groundwater Management Issues in the Elsinore Basin 4.10-6
Table 4.10-4	Comparison of Existing and Proposed Drainage Conditions..... 4.10-18
Table 4.11-1	Analysis of Consistency with SCAG Draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Goals 4.11-18
Table 4.12-1	Mineral Resources Zones..... 4.12-2
Table 4.13-1	Common Acoustical Descriptors 4.13-4
Table 4.13-2	Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibration Levels 4.13-7
Table 4.13-3	Existing (Baseline) Noise Measurements 4.13-8
Table 4.13-4	Existing (Baseline) Traffic Noise Levels..... 4.13-10



LIST OF TABLES (CONT'D)

<u>Table Number and Title</u>	<u>Page</u>
Table 4.13-5	Ground-Borne Vibration and Ground-Borne Noise Impact Criteria for General Assessment..... 4.13-11
Table 4.13-6	Stationary Source Land Use Noise Standards (Residential)..... 4.13-16
Table 4.13-7	Land Use Compatibility for Community Noise Exposure..... 4.13-19
Table 4.13-8	Onsite Construction Average (dBA) Noise Levels at Nearest Receptors..... 4.13-27
Table 4.13-9	Offsite Construction Average (dBA) Noise Levels at Nearest Receptor..... 4.13-28
Table 4.13-10	Existing Plus Project Conditions Predicted Traffic Noise Levels (Primary Distribution)..... 4.13-30
Table 4.13-11	Horizon Year (2040) Predicted Traffic Noise Levels (Primary Distribution) 4.13-31
Table 4.13-12	Existing Plus Project Conditions Predicted Traffic Noise Levels (Alternative Distribution) 4.13-32
Table 4.13-13	Horizon Year (2040) Predicted Traffic Noise Levels (Alternative Distribution)..... 4.13-33
Table 4.13-14	Modeled Operational Noise Levels..... 4.13-36
Table 4.13-15	Representative Vibration Source Levels for Construction Equipment 4.13-39
Table 4.13-16	Onsite Construction Vibration Levels at 200 Feet..... 4.13-39
Table 4.13-17	Offsite Construction Vibration Levels at 25 Feet 4.13-40
Table 4.15-1	SCAG Region Projected 2000-2045 Growth Forecast 4.15-1
Table 4.15-2	Regional Housing Needs Allocation Unincorporated County (2014-2021)..... 4.15-3
Table 4.18-1	Project VMT per Employee 4.18-15
Table 4.18-2	Riverside County Total VMT 4.18-16
Table 4.18-3	Project Transportation Improvements, Fee Payments, and Fair-Share Contributions 4.18-25
Table 4.20-1	Project-Related Wastewater Generation 4.20-16
Table 4.20-2	Project Area Demands 4.20-17
Table 4.20-3	Projected Water Supplies (Acre-Feet) 4.20-18
Table 4.20-4	Project Solid Waste Generation 4.20-21
Table 6-1	Reduced Project Alternative Land Uses 6-4
Table 6-2	Alternatives to the Proposed Project – Comparison of Environmental Impacts..... 6-31



EIR TECHNICAL APPENDICES (BOUND SEPARATELY)

Appendix A.	Notice of Preparation and Written Comments on the NOP
Appendix B.	Air Quality Emissions Assessment
Appendix C1.	Biological Technical Report
Appendix C2.	Determination of Biological Equivalent or Superior Preservation (DBESP)
Appendix D.	Cultural Resources Assessment
Appendix E.	Energy Analysis
Appendix F1.	Updated Geotechnical Evaluation
Appendix F2.	2003 Geotechnical Study (Southern Portions)
Appendix F3.	2003 Geotechnical Study (Northern Portions)
Appendix G1.	Phase I Environmental Site Assessment Report
Appendix G2.	Phase II Environmental Site Assessment Report
Appendix H1.	Preliminary Drainage Report
Appendix H2.	Preliminary Water Quality Management Plan
Appendix I.	General Plan Consistency Analysis
Appendix J1.	Noise Assessment
Appendix J2.	Focused Traffic Route Noise Memorandum
Appendix K.	Paleontological Resource Impact Monitoring Program
Appendix L1.	Vehicle Miles Travelled Analysis
Appendix L2.	Traffic Analysis
Appendix L3.	Focused Traffic Assessment (Horsethief Driveway Alignment)
Appendix L4.	Focused Traffic Assessment (Alternative Site Access)
Appendix M.	Water Supply Assessment
Appendix N.	Fire Protection Plan
Appendix O.	Draft Specific Plan No. 333, Amendment No. 1



ACRONYMS AND ABBREVIATIONS

<u>Acronym</u>	<u>Definition</u>
§	Section
°F	Fahrenheit
µg/m ³	Micrograms per Cubic Meter
A-1	“Light Agriculture” Riverside County zoning designation
A-1-10	“Light Agriculture – 10 Acres” Riverside County zoning designation
A-2	“Heavy Agriculture” Riverside County zoning designation
A-D	“Agriculture-Dairy” Riverside County zoning designation
A-P	“Light Agriculture with Poultry” Riverside County zoning designation
A-P Act	Alquist-Priolo Earthquake Fault Zoning Act
AB	Assembly Bill
AB 16	Assembly Bill 16
AB 32	California Global Warming Solutions Act of (2006)
AB 52	Native Americans: California Environmental Quality Act
AB 341	Mandatory Commercial Recycling Program
AB 939	California Solid Waste Integrated Waste Management Act
AB 1327	Waste Reuse and Recycling Act
AB 1358	Complete Streets Act
AB 1493	Pavely Fuel Efficiency Standards
AB 2185	Assembly Bill 2185
AB 3030	Assembly Bill 3030
ABAU	Adjusted Business As Usual
ACM	Alternative Calculation Method
ACOE	Army Corps of Engineers
ACS	American Community Survey
ADOE	Archaeological Determinations of Eligibility
ADT	Average Daily Traffic
ADT	Average Daily Trips
af	Acre-feet
af/yr	Acre Feet per Year
AG	Agriculture
AIA	Airport Influence Area
AICP	American Institute of Certified Planners
AIRFA	American Indian Religious Freedom Act
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMSL	Above Mean Sea Level
APS	Alternative Planning Strategy



<u>Acronym</u>	<u>Definition</u>
APN	Assessor Parcel Number
AQA	Air Quality & Greenhouse Gas Assessment
AQIA	Air Quality Impact Analysis
AQMP	Air Quality Management Plan
ARB	Air Resources Board
ASTM	American Society of Testing and Materials
BAAQMD	Bay Area Air Quality Management District
BACM	Best Available Control Measure
BMPs	Best Management Practices
BERD	Built Environment Resources Directory
BLM	Bureau of Land Management
BP	Business Park
BP	Before Present
BSC	Building Standards Code
BTU	British Thermal Unit
C/V	“Citrus/Vineyard” Riverside County zoning designation
CA MUTCD	California Manual on Uniform Traffic Control Devices
CAA	Federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAB	California Architects Board
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod™	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalEnviroScreen	California Communities Environmental Health Screening Tool Version 3.0
CALGAPS	California LBNL GHG Analysis of Policies Spreadsheet
CALGreen	California Green Building Standards Code
CalSTA	California State Transportation Agency
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CASSA	Criteria Area Species Survey Area
CBSC	California Building Standards Code
CBSC	California Building Standards Commission
CC	Community Center
CCR	California Code of Regulations
CCAA	California Clear Air Act
C&D	Construction and Demolition
CDC	California Department of Conservation



<u>Acronym</u>	<u>Definition</u>
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CDPR	California Department of Pesticide Regulation
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CETAP	Community Environmental Transportation Acceptability Process
CFCs	Chlorofluorocarbons
CFR	Code of Federal Regulations
CFS	Cubic Feet per Second
CGC	California Government Code
CH ₄	Methane
CDFW	California Department of Fish and Wildlife
CHL	California Historic Landmarks
CIWMB	California Integrated Waste Management Board
CIWMP	Riverside Countywide Integrated Waste Management Plan
CLCA	California Land Conservation Act
CMP	Congestion Management Program
CMUTD	California Manual on Uniform Traffic Control Devices
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
COA	Conditions of Approval
COG	Council of Governments
CO ₂	Carbon Dioxide
CO _{2e}	Carbon Dioxide Equivalent
COP	Conference of the Parties
COP	Community Oriented Policing
COPPS	Community Oriented and Policing Problem Solving
CPEP	Clean Power and Electrification Pathway
CPHI	California Points of Historical Interest
CPUC	California Public Utilities Commission
CR	Commercial Retail
CRA	Cultural Resources Assessment
CRA	Colorado River Aqueduct
CRHR	California Register of Historic Places
CSA	Community Service Area
CTC	California Transportation Commission
CTR	California Toxic Rule
CUP	Conditional Use Permit
CWA	Clean Water Act
CWC	California Water Code



<u>Acronym</u>	<u>Definition</u>
c.y.	cubic yards
CZ	Change of Zone
CZ 2000016	Change of Zone 2000016
dB	Decibel
dBA	A-weighted Decibels
DBESP	Determination of Biological Equivalent or Superior Preservation
DBF	deposit-based fee
DC/TP	discovery clause/treatment plan
DEH	Department of Environmental Health
DIF	Development Impact Fee
DMA	Drainage Management Areas
DMV	Department of Motor Vehicles
DOE	Determination of Eligibility
DOF	California Department of Finance
DOSH	Division of Occupational Safety and Health
DPM	Diesel Particulate Matter
DTSC	Department of Toxic Substances Control
du/ac	Dwelling Units per Acre
DWR	Riverside County Department of Waste Resources
DWR	Riverside County Department of Water Resources
EA	Environmental Assessment
EAP	Existing Plus Ambient Plus Project
EAP	Elsinore Area Plan
EAPC	Existing Plus Ambient Plus Cumulative Plus Project
e.g.	for example
EDR	Environmental Data Resources, Inc.
EIC	Eastern Information Center
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EMFAC	EMission FACtor model
EMWD	Eastern Municipal Water District
EO	Executive Order
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-To-Know Act
EPS	Emission Performance Standard
ESA	Environmental Site Assessment
ETW	Equivalent Test Weight
EV	Electric Vehicle



<u>Acronym</u>	<u>Definition</u>
FAA	Federal Aviation Administration
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FHWA-RD-77-108	FHWA Highway Traffic Noise Prediction Model
FHWA	Federal Highway Administration
FIMA	Federal Insurance and Mitigation Administration
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FMZ	Fuel Modification Zone
FPP	Fire Protection Plan
FPEIR	Final Program Environmental Impact Report
FRAP	Resource Assessment Program
FTA	Federal Transit Administration
FYI	for your information
GBN	Ground-Based Noise
GBV	Ground-Based Vibration
GHG	Greenhouse Gas
GLO	General Land Office
GMP	Groundwater Basin
GMZ	Groundwater Management Zone
GOBiz	Governor's Office of Business and Economic Development
gpd	Gallons per Day
GPA	General Plan Amendment
GPA 200004	General Plan Amendment No. 200004
GPCD	Gallons per Capita per Day
GSA	Groundwater Sustainability Agencies
GSP	Groundwater Sustainability Plans
GVWR	Gross Vehicle Weight Rating
GWH	Gigawatt Hours
Ha	High Sensitivity A
Hb	High Sensitivity B
HAPs	Hazardous Air Pollutants
HBW	Home Based Work
HCM	Highway Capacity Manual
HCP	Habitat Conservation Plan
HD	heavy-duty
HHD	Heavy-Heavy Duty Trucks



<u>Acronym</u>	<u>Definition</u>
HI	Hazard Index
HMBEP	Hazardous Materials Business Emergency Plan
HMTA	Hazardous Materials Transportation Act
HMTAUSA	Hazardous Materials Transportation Uniform Safety Act
HOV	High-Occupancy Vehicle
HPDF	Historic Property Data File
HPS	High Pressure Sodium
HRA	Health Risk Assessment
HSC	Health and Safety Code
HSWA	Federal Hazardous and Solid Waste Amendments
HUD	Department of Housing and Urban Development
HWCL	Hazardous Waste Control Law
I	Interstate
I-215	Interstate 215
I-15	Interstate 15
i.e.	that is
IA	Implementing Agreement
ICAO	International Civil Aviation Organization
IEPR	Integrative Energy Policy Report
In/sec	Inches Per Second
IRP	Integrated Resource Planning
ISO	Independent Service Operator
ISTEA	Intermodal Surface Transportation Efficiency Act of 1991
ITE	Institute of Transportation Engineers
ITIP	Interregional Transportation Improvement Plan
IWMA	Integrated Waste Management Act
IWMP	Integrated Waste Management Plan
JPA	Joint Powers Authority
LACM	Museum of Los Angeles County
LBNL	Lawrence Berkeley National Laboratory
LDA	light-duty auto
LCFS	low carbon fuel standard
LDT1	Light-Duty Trucks with an ETW of less than or equal to 3,750 pounds
LDT2	Light-Duty Trucks with an ETW between 3,751 and 5,750 pounds
LEA	Lead Enforcement Agency
Leq	equivalent continuous sound level
LI	“Light Industrial” SP 293 land use designation
Lmax	maximum noise level



<u>Acronym</u>	<u>Definition</u>
LOS	Level of Service
LRA	Local Responsibility Areas
LSEs	Load-Serving Entities
LSTs	Localized Significance Thresholds
LTF	Local Transportation Fund
LTOs	Licensed Timber Operators
LUST	Leaking Underground Storage Tank
MARB	March Air Reserve Base
MCY	Motorecycles
MCP	Mid-County Parkway
MD	medium-duty
MDP	Master Drainage Plan
MDR	“Medium Density Residential” SP 293 land use designation
MDV	Medium-Duty Trucks
MGD	million gallons per day
MHDR	“Medium High Density Residential” SP 293 land use designation
MHDT	Medium-Heavy Duty Trucks
MICR	Maximum Individual Cancer Risk
MLD	Most Likely Descendent
MMTs	million metric tons
MMTCO _{2e}	million metric tons of carbon dioxide equivalent
MMTCO _{2e} /yr	million metric tons of carbon dioxide equivalent per year
Mph	Miles Per Hour
MPO	Metropolitan Planning Organization
MRZ-3	Mineral Resource Zone 3
MS4	Municipal Separate Storm Sewer System
MSHCP	Multiple Species Habitat Conservation Plan
MSR	million solar roofs
MTCO _{2e}	Metric Tons of Carbon Dioxide Equivalent
MVTS	Moreno Valley Transfer Station
MWD	Metropolitan Water District
NAHC	Native American Heritage Commission
NAGPRA	National American Graves Protection and Reparation Act
NAAQS	National Ambient Air Quality Standards
NDA	No Development Alternative
NDC	nationally determined contributions
NEPSSA	Narrow Endemic Plant Species Survey Area
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program



<u>Acronym</u>	<u>Definition</u>
NHLs	National Historic Landmarks
NHPA	National Historic Preservation Act
NIOSH	National Institute for Occupational Safety and Health
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
N ₂ O	Nitrous Oxide
NOAA	National Oceanic and Atmospheric Administration
NOP	Notice of Preparation
NPA	No Project Alternative
NPDES	National Pollutant Discharge Elimination System
NPRM	Notice of Proposed Rule Making
NPS	National Park Service
NPS	non-point source
NRHP	National Register of Historic Places
NTR	National Toxic Rule
NUSD	Nuview Union School District
NVIA	Noise and Vibration Impact Assessment
O ₃	Ozone
OAG	Office of Attorney General
OAL	Office of Administrative Law
OBUS	Other Buses
OEHHA	Office of Environmental Health Hazard Assessment
Off-Site CRA	Off-site impact areas
OHP	Office of Historic Preservation
OIH	Office of Industrial Hygiene
OPR	Office of Planning and Research
OS-C	“Open-Space Conservation” SP-293 land use designation
OS-CH	Open Space – Conservation Habitat
OS-R	“Open-Space Recreation” SP 293 land use designation
OS-W	“Open-Space Water” SP 293 land use designation
OSHA	Occupational Safety and Health Assessment
PA	Public Address
PCBs	Polychlorinated biphenyls
PCEs	Passenger Car Equivalents
PeMS	Caltrans’ Performance System Website
PF	“Public Facilities” SP 293 land use designation
PG&E	Pacific Gas and Electric
PHF	peak hour factor
p.m.	Post Meridiem (between the hours of noon and midnight)



<u>Acronym</u>	<u>Definition</u>
PM	Particulate Matter
PM _{2.5}	Fine Particulate Matter (2.5 microns or smaller)
PM ₁₀	Fine Particulate Matter (10 microns or smaller)
POUs	Publicly-Owned Electric Utilities
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
PRIMP	Paleontological Resources Impact Mitigation Program
PRPA	Paleontological Resources Preservation Act
PUC	Public Utilities Code
PUHSD	Perris Union High School District
PVRWRF	Perris Valley Regional Water Reclamation Facility
PWQMP	Preliminary Water Quality Management Plan
Qvof	Quaternary Very Old Fan Deposits
R-A-5	Residential Agricultural, 5-acre Minimum Lot Size
R-R	“Rural Residential” Riverside County Zoning Designation
RC-LDR	Rural Community – Low Density Residential
RCA	Western Riverside County Regional Conservation Authority
RCALUC	Riverside County Airport Land Use Commission
RCCDR	Riverside County Center for Demographic Research
RCDWR	Riverside County Department of Waste Resources
RCFCWCD	Riverside County Flood Control and Water Conservation District
RCFD	Riverside County Fire Department
RCHCA	Riverside County Habitat Conservation Agency
RCSD	Riverside County Sheriff’s Department
RCIT	Riverside County Information Technology
RCPG	Regional Comprehensive Plan and Guide
RCPLS	Riverside County Public Library System
RCRA	Resource Conservation and Recovery Act
RCTC	Riverside County Transportation Commission
RCWD	Rancho California Water District
REC	Recognized environmental Concerns
REL	Reference Exposure Level
RHNA	Regional Housing Needs Assessment
RivTAM	Riverside Transportation Analysis Model
RMM	Riverside Municipal Museum
RMS	root mean square
ROGs	Reactive Organic Gasses



<u>Acronym</u>	<u>Definition</u>
ROW	Right-of-Way
RPFs	Registered Professional Foresters
RPS	Renewable Portfolio Standards
RSHA	Regional System of Highways and Arterials
RTA	Riverside Transit Agency
RTIP	Regional Transportation Improvement Plan
RTP	Regional Transportation Plan
RTPA	Regional Transportation Planning Agency
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
RWRF	Regional Water Reclamation Facility
SF/s.f.	square foot or square feet
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SB 18	Senate Bill 18
SB 1	Road Repair and Accountability Act of 2017
SB 32	Statewide for California to reduce GHG emissions
SB 50	Senate Bill 50
SB 221	Senate Bill 221
SB 325	Transportation Development Act (Mills-Alquist-Deddeh Act)
SB 375	Senate Bill 375
SB 350	Clean Energy and Pollution Reduction Act of 2015
SB 610	Senate Bill 610
SB 743	Senate Bill 743, Transportation Impacts
SB 1000	Senate Bill 1000
SB 1368	CPUC adopt a GHG emission performance standard
SB 1078	California Renewables Portfolio Standard Program
SBCM	San Bernardino County Museum
SCAB	South Coast Air Basin
SCAG	Sothern California Association of Governments
SCAQMD	Southern Coast Air Quality Management District
SCE	Southern California Edison
SCH	California State Clearinghouse (Office of Planning and Research)
SCS	Sustainable Communities Strategy
SDG&E	San Diego Gas and Electric
SDNHM	San Diego Natural History Museum
SDWA	Safe Drinking Water Act
SED	Socio-Economic Data
SFP	School Facilities Program
SGC	Strategic Growth Council



<u>Acronym</u>	<u>Definition</u>
SGMA	Sustainable groundwater management act
SHMA	Seismic Hazards Mapping Act
SHPO	State Historic Preservation Officers
SHRC	State Historical Resources Commission
SHS	State Highway System
SHWS	State Hazardous Waste Sites
SIPs	State Implementation Plans
SJVAPCD	San Joaquin Valley Air Pollution Control District
SKR HCP	Stephens' Kangaroo Rat Habitat Conservation Plan
SLPS	short-lived climate pollutant strategy
SMARA	Surface Mining and Reclamation Act of 1975
SNUR	Significant New Use Rule
SoCalGas	Southern California Gas
SOC	Statement of Overriding Conditions
SO ₂	Sulfur Dioxide
SO _x	Sulfur Oxide
SP	Specific Plan
SP Zone	Specific Plan Zone
SP 333	Renaissance Ranch Specific Plan No. 333
SP 333A1	Renaissance Ranch Specific Plan No. 333 Amendment No. 1
SR	State Route
SR-74	State Route 74
SR-79	State Route 79
SRA	Source Receptor Area
SRA	State Responsibility Areas
SRRE	Source Reduction and Recycling Elements
STA	State Transit Assistance
STC	Sound Transmission Class
STIP	Statewide Transportation Improvement Program
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Regional Control Board
TAC	Toxic Air Contaminants
TAZ	traffic analysis zones
TCL	Traditional Cultural Landscape
TDA	Transportation Development Act
TDM	Transportation Demand Management
THP	Timber Harvesting Plan
TIA	Traffic Impact Analysis



<u>Acronym</u>	<u>Definition</u>
TPA	Transit Priority Area
TPD	Tons per Day
TPY	Tons per Year
TTM	Tentative Tract Map
TUMF	Transportation Uniform Mitigation Fee
UCR	University of California, Riverside
UNFCCC	United Nations Framework Convention on Climate Change
U.S.	United States
USDA	United States Department of Agriculture
USEPA	United States of Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geologic Survey
UWMP	Urban Water Management Plan
UWMP Act	Urban Water Management Planning Act
UWMP-MWD	MWD's 2015 Urban Water Management Plan
VHDR	"Very High Density Residential" SP 293 land use designation
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds
VVUSD	Val Verde Unified School District
W-1	Watercourse, Watershed & Conservation Areas
W-2	Controlled Development Areas
WDR	Water discharge report/ requirements
WMI	Watershed Management Initiative
WMIE	Waste Management Inc. of the Inland Empire
WQMP	Water Quality Management Plan
WRP	Waste Recycling Plan
WRRRA	Waste Reuse and Recycling Act
WRCOG	Western Riverside Council of Governments
WSA	Water Supply Assessment
WSC	Western Science Center
WSCP	Water Shortage Contingency Plan
WSP	High-cube Warehouse Trip Generation Study
WUI	Wildland-Urban Interface
ZE/NZE	zero- and near-zero emission
ZORI	Zones of Required Investigation



S.0 EXECUTIVE SUMMARY

S.1 INTRODUCTION

The California Environmental Quality Act (CEQA), Public Resources Code Section 21000, *et seq.* requires that before a public agency makes a decision to approve a project that could have one or more adverse effects on the physical environment, the agency must inform itself about the project’s potential environmental impacts, give the public an opportunity to comment on the environmental issues, and take feasible measures to avoid or reduce potential harm to the physical environment.

This Draft Program Environmental Impact Report (EIR), having California State Clearinghouse (SCH) No. 2021030301, was prepared in accordance with State CEQA Guidelines Article 9, Sections 15120-15132 to evaluate the potential environmental impacts associated with planning, constructing, and operating the proposed Project, which consists of General Plan Amendment No. 200004 (GPA200004), Amendment No. 1 to Specific Plan No. 333 (SP00333A01), and Change of Zone No. 2000016 (CZ2000016), which are collectively referred to herein as the “Project” or “proposed Project.” This Program EIR does not recommend approval or denial of the proposed Project; rather, this Program EIR is a source of factual information regarding potential impacts that the Project may cause to the physical environment. The Draft Program EIR will be available for public review for a minimum period of 45 days. After consideration of public comment, the County of Riverside will consider certifying the Final EIR and adopting required findings.

This Executive Summary complies with State CEQA Guidelines Section 15123, “Summary.” This Program EIR includes a description of the proposed Project and evaluates the physical environmental effects that could result from Project implementation. The County of Riverside determined that the scope of this EIR should cover 21 subject areas. The scope includes all of the subject areas listed in Appendix G to the State CEQA Guidelines and in consideration of public comment received by the County in response to this EIR’s Notice of Preparation (NOP). The NOP, and written comments received by the County in response to the NOP, are attached to this EIR as *Technical Appendix A*. In consideration of public comment on the NOP, the 21 environmental subject areas that could be reasonably and significantly affected by planning, constructing, and/or operating the proposed Project are analyzed herein, including:

- | | |
|---------------------------------------|-----------------------------------|
| 1. Aesthetics | 12. Mineral Resources |
| 2. Agriculture and Forestry Resources | 13. Noise |
| 3. Air Quality | 14. Paleontological Resources |
| 4. Biological Resources | 15. Population and Housing |
| 5. Cultural Resources | 16. Public Services |
| 6. Energy | 17. Recreation |
| 7. Geology and Soils | 18. Transportation |
| 8. Greenhouse Gas Emissions | 19. Tribal Cultural Resources |
| 9. Hazards and Hazardous Materials | 20. Utilities and Service Systems |
| 10. Hydrology and Water Quality | 21. Wildfire |
| 11. Land Use and Planning | |



Refer to EIR Section 4.0, *Environmental Analysis*, for a full account and analysis of the subject matters listed above. For each of the aforementioned subject areas, this EIR describes: 1) the physical conditions that existed at the approximate time this EIR's NOP was filed with the California State Clearinghouse (March 11, 2021); 2) discloses the type and magnitude of potential environmental impacts resulting from Project planning, construction, and operation; and 3) if warranted, recommends feasible mitigation measures that would reduce or avoid significant adverse environmental impacts that the proposed Project may cause. A summary of the proposed Project's significant environmental impacts and the mitigation measures imposed by the County of Riverside on the Project to lessen or avoid those impacts is included in this Executive Summary as Table S-1, *Summary of Impacts, Mitigation Measures, and Conclusions*. The County of Riverside applies mitigation measures that it determines: 1) are feasible and practical for project applicants to implement; 2) are feasible and practical for the County of Riverside to monitor and enforce; 3) are legal for the County to impose; 4) have an essential nexus to the Project's impacts; and 5) would result in a benefit to the physical environment. CEQA does not require the Lead Agency to impose mitigation measures that are duplicative of mandatory regulatory requirements.

This EIR also discusses alternatives to the proposed Project. Alternatives are described that would attain most of the Project's objectives while avoiding or substantially lessening the proposed Project's significant adverse environmental effects. A full discussion of Project alternatives is found in Section 6.0, *Alternatives*.

S.2 PROJECT SYNOPSIS

S.2.1 LOCATION AND REGIONAL SETTING

The 157.1-acre Project site is located within the western portion of unincorporated Riverside County, California. EIR Figure 2-1, *Regional Map*, depicts the Project site's location within the regional vicinity. As shown, Riverside County abuts San Bernardino County to the north; Orange County to the west; and San Diego and Imperial Counties to the south. The Project site is located within the western region of unincorporated Riverside County, California. As depicted on EIR Figure 2-2, *Vicinity Map*, the Project site is located near the community of Lake Elsinore and adjacent to the Horsethief Canyon Ranch community. More specifically, and as depicted on EIR Figure 2-2, the 157.1-acre site is located east of Horsethief Canyon Road, south of Interstate 15 (I-15), north of Palomino Creek Drive, and north and west of Hostettler Road. The Project site includes Assessor Parcel Numbers (APNs) 393-120-010 and -011; 393-150-001 through -075; 393-180-004 through -010; 393-250-001 through -041; 393-260-001 through -068; 393-270-001 through -027; 393-280-001 through -087; 393-290-001 through -055; 393-300-001 through -028; 393-310-005; and 394-020-002 through -003. The 157.1-acre site occurs within Section 17, Township 5 South, Range 5 West, San Bernardino Baseline and Meridian. (RCIT, 2020)

S.2.2 PROJECT OBJECTIVES

The fundamental purpose and goal of the proposed Project is to accomplish the orderly development of underutilized property with an economically viable, employment-generating use to increase employment opportunities in a housing rich portion of unincorporated Riverside County. This underlying goal aligns with various aspects of the Southern California Association of Government's (SCAG) 2020-2045 *Regional*



Transportation Plan/Sustainable Communities Strategy (RTP/SCS; also referred to as “Connect SoCal”), particularly the facilitation of goods movement industries and the generation of local employment opportunities that can reduce the need for long commutes to and from work. The following objectives are intended to achieve these underlying purposes:

- A. To efficiently develop an underutilized property with a complementary mix of employment-generating land uses, including light industrial and business park land uses.
- B. To assist the SCAG region in achieving jobs/housing balance region-wide and in the local area by providing additional job opportunities in a housing rich area of the Inland Empire that will reduce the need for members of the local workforce to commute outside the area for employment.
- C. To expand economic development, facilitate job creation, and increase the tax base for Riverside County by accommodating and diversifying facilities needed to support the goods movement supply chain.
- D. To establish development standards and design guidelines to ensure future development on site complements other existing and planned uses in the immediate vicinity and minimizes conflicts with other nearby land uses.
- E. To establish a unified thematic concept for future development through design elements such as architecture, monumentation, theme walls, and landscaping using a long-range comprehensive planning approach that cannot be accomplished on a parcel-by-parcel basis.
- F. To anticipate market demand by providing a mixture of light industrial and business park land uses in a master-planned commerce center that would be marketable within the evolving economic profile of western Riverside County.
- G. To develop a mix of light industrial and business park uses in unincorporated Riverside County that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar uses in the local area and region.
- H. To develop a property that has access to available infrastructure, including roads and utilities.

S.2.3 PROJECT SUMMARY DESCRIPTION

The County of Riverside is the Lead Agency for the proposed Project, under whose authority this Program EIR has been prepared. For purposes of this Program EIR, the term “Project” refers to the Project’s discretionary applications for the first amendment to the Renaissance Ranch Specific Plan No. 333 (SP00333A01), a General Plan Amendment (GPA200004), and Change of Zone (CZ2000016); future implementing discretionary actions required to implement the Project (e.g., tentative tract maps, plot plans, etc.); and all of the activities associated with Project implementation including planning, construction, and long-term operations.



The Project as evaluated herein consists of a proposal to amend the General Plan and specific plan land use designations and to change the site's zoning classification to allow for the future development of the 157.1-acre Project site with 18.0 acres of "Business Park (BP)" uses, 97.2 acres of "Light Industrial (LI)" uses, "Open Space – Conservation (OS-C)" on 11.5 acres, "Open Space – Conservation Habitat (OS-CH)" on 27.1 acres, and major circulation facilities on 3.3 acres. Specifically, the Project Applicant is requesting the following governmental approvals from the County of Riverside to implement the Project (refer to Chapter 3.0, *Project Description*, for a complete description of the Project's construction and operational characteristics):

- **General Plan Amendment No. 200004 (GPA200004)** is proposed to modify the approved land uses for the Project site in order to reflect changes proposed as part of proposed Amendment No. 1 to the Renaissance Ranch Specific Plan No. 333 (SP00333A01), which is discussed below. The adopted General Plan designates the Project site for "Medium Density Residential (MDR)" land uses. With approval of GPA200004, the Project site would be designated for "Business Park (BP)" land uses on 18.0 acres; "Light Industrial (LI)" land uses on 97.2 acres; "Open Space – Conservation (OS-C)" land uses on 11.5 acres; "Open Space – Conservation Habitat (OS-CH)" land uses on 27.1 acres; and major circulation facilities on 3.3 acres.
- **Amendment No. 1 to Specific Plan No. 333 (SP00333A1)** is proposed to modify the allowed land uses and planning area boundaries within the Renaissance Ranch Specific Plan (SP 333). Under existing conditions, SP 333 designates the 157.1-acre Project site for 355 "Medium Density Residential (MDR)" dwelling units, a 4.3-acre community park, 2.0 acres of pocket parks, and open space on 52.8 acres. SP00333A1 consists of a proposal to modify the approved land uses to instead include "Business Park (BP)" land uses on 18.0 acres; "Light Industrial (LI)" land uses on 97.2 acres; "Open Space – Conservation (OS-C)" land uses on 11.5 acres; "Open Space – Conservation Habitat (OS-CH)" land uses on 27.1 acres; and major circulation facilities on 3.3 acres. As proposed by SP00333A01, areas designated for "Light Industrial" and "Business Park" uses may be developed with a Floor Area Ratio (FAR) up to 0.50. Accordingly, approval of SP00333A01 would allow for the future development of up to 392,040 s.f. of "Business Park" building area and up to 2,117,016 s.f. of "Light Industrial" building area.
- **Change of Zone No. 2000016 (CZ2000016)** is proposed to modify the Planning Area boundaries, permitted uses, and development standards throughout the 157.1-acre site in order to reflect the land uses proposed as part of SP00333A01, as described above.

S.3 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

State CEQA Guidelines § 15123(b)(2) requires that areas of controversy known to the Lead Agency (Riverside County) be identified in the Executive Summary. Substantive issues raised in response to the NOP are summarized in Table 1-1 in EIR Section 1.0. The purpose of this table is to present the primary environmental issues of concern raised by public agencies and the general public during the NOP review period. The table is not intended to list every comment received by the County during the NOP review period. Regardless of



whether or not a comment is listed in the table, all applicable comments received in responses to the NOP are addressed in this Program EIR. Based on comments received during the NOP review period, Project impacts to the environment under the issues of aesthetics, air quality, biological resources, cultural resources, greenhouse gas emissions, land use/planning, noise, transportation, and tribal cultural resources were identified as potential areas of concern.

S.4 PROJECT ALTERNATIVES

S.4.1 NO DEVELOPMENT ALTERNATIVE (NDA)

The No Development Alternative (NDA) considers no development/disturbance on the Project site beyond that which occurs under existing conditions. As such, the Project site would continue to consist of 157.1 acres of vacant and undeveloped land. Under the NDA, no improvements would be made to the Project site and none of the Project's roadway, utility, or other infrastructure improvements would occur. This Alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would leave the Project site in its existing condition.

S.4.2 NO PROJECT (ADOPTED SPECIFIC PLAN) ALTERNATIVE (NPA)

The No Project (Existing Specific Plan) Alternative, herein referred to as the "No Project Alternative (NPA)," assumes development of the 157.1-acre property in accordance with the site's existing General Plan and Specific Plan land uses. Figure 2-5 in EIR Subsection 2.0 depicts the site's existing Specific Plan land use designations. Thus, under this alternative, and consistent with the adopted Renaissance Ranch Specific Plan No. 333 (SP 333), the Project site would be developed with 355 Medium Density Residential dwelling units on 98.7 acres, with minimum lot sizes ranging from 5,000 s.f. to 8,000 s.f. in size; a Community Park on 4.3 acres; four pocket parks on 2.0 acres; Open Space/Conservation land uses on 27.1 acres; and Open Space/Drainage uses on 25.7 acres. This Alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would allow for buildout of the Project site in accordance with the site's existing General Plan and SP 333 land use designations.

S.4.3 REDUCED PROJECT ALTERNATIVE (RPA)

The Reduced Project Alternative (RPA) considers development of the Project site in a manner similar to the proposed Project, but with a reduced development intensity. Specifically, proposed Business Park and Light Industrial land uses would be developed at a maximum Floor Area Ratio (FAR) of 0.35, in lieu of the 0.50 FAR proposed as part of the Project. As with the proposed Project, Light Industrial building area is assumed to consist of approximately 20% "High-Cube Cold Storage" uses, 35% "High-Cube Fulfillment Center" uses, 35% "High Cube Warehouse" uses, and 10% "Manufacturing" uses, while Business Park building area is assumed to consist of approximately 60% "Industrial Park" uses and 40% "Warehouse" uses. The RPA would result in up to 274,428 s.f. of Business Park land uses and 1,481,911 s.f. of Light Industrial uses, for a total of 1,756,339 s.f. of building area. All other components of the RPA would be identical to the proposed Project, including areas planned for physical impacts both on and off site. This alternative was selected by the Lead Agency in order to evaluate an alternative that would reduce the Project's significant and unavoidable impacts



to air quality and transportation. The RPA is identified as the environmentally superior alternative pursuant to State CEQA Guidelines § 15126.6(e)(2).

S.5 EIR PROCESS

As a first step in the CEQA compliance process, Riverside County determined that the proposed Project likely would result in significant environmental effects, and distributed a Notice of Preparation (NOP) for public review on March 11, 2021. An Initial Study was not prepared for the Project, and thus this EIR evaluates all of the environmental subjects listed in Appendix G to the State CEQA Guidelines, as set forth in the County's standard Environmental Assessment Checklist form. Because the Project would require future discretionary approvals (e.g., tentative tract maps, plot plans, etc.), this EIR has been prepared as a Program EIR pursuant to State CEQA Guidelines § 15168. As described by State CEQA Guidelines § 15168(a), a Program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: 1) geographically; 2) are logical parts [*sic*] in the chain of contemplated actions; 3) in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or 4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways. For purposes of discussion herein, the terms "EIR" and "Program EIR" are used interchangeably.

This Program EIR represents the independent judgment of Riverside County (as the Lead Agency) and evaluates the physical environmental effects that could result from constructing and operating the proposed Project. Acting as Lead Agency, the County of Riverside will consider the following issues regarding the proposed Project: a) evaluation of this Program EIR to determine if the physical environmental impacts are adequately disclosed; b) assessment of the adequacy and feasibility of identified mitigation measures and the potential addition, modification to, or deletion of mitigation measures, standard conditions of approval, or Project design features; c) consideration of alternatives to the Project that would reduce or eliminate significant environmental effects of the Project; and, if necessary, d) consideration of Project benefits that override the Project's unavoidable and unmitigable significant effects on the environment.

Before taking action to approve the Project, the County of Riverside (serving as the Lead Agency) has the obligation to: (1) ensure this Program EIR has been completed in accordance with CEQA; (2) review and consider the information contained in this Program EIR as part of its decision making process; (3) make a statement that this Program EIR reflects Riverside County's independent judgment; (4) ensure that all significant effects on the environment are avoided or substantially lessened where feasible; and, if necessary (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or project alternatives identified in this Program EIR are infeasible and citing the specific benefits of the proposed Project that outweigh its unavoidable adverse effects (State CEQA Guidelines §§ 15090-15093).



S.6 SUMMARY OF IMPACTS, MITIGATION MEASURES AND CONCLUSIONS

S.6.1 EFFECTS FOUND NOT TO BE SIGNIFICANT

An Initial Study was not prepared for the proposed Project, and thus this EIR evaluates all of the environmental subjects listed in Appendix G to the State CEQA Guidelines, as set forth in the County's standard Environmental Assessment Checklist form. There were no issues found to be not significant as a result of the Project's NOP process.

S.6.2 IMPACTS OF THE PROPOSED PROJECT

Table S-1, *Summary of Impacts, Mitigation Measures, and Conclusions*, provides a summary of the proposed Project's environmental impacts, as required by State CEQA Guidelines § 15123(a). Also presented are the mitigation measures recommended by Riverside County to further avoid adverse environmental impacts or to reduce their level of significance. After the application of all feasible mitigation measures, the Project would result in significant and unavoidable environmental effects, as summarized below.

- Agricultural and Forestry Resources: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. The Project would result in direct, permanent impacts due to the conversion of approximately 80.0 acres of "Farmland of Local Importance" to non-agricultural use. Mitigation measures are not available to reduce impacts to 80.0 acres of "Farmland of Local Importance" to below a level of significance; thus, impacts would be significant and unavoidable.
- Air Quality: Significant and Unavoidable Direct and Cumulatively-Considerable Impacts. Long-term operations of the proposed Project would result in daily emissions of NO_x and ROG_s that exceed the SCAQMD Regional Thresholds. Although mitigation measures are identified to reduce impacts to the maximum feasible extent, a majority of NO_x emissions associated with Project operations would result from vehicular traffic, and in particular truck traffic. Mobile source emissions are regulated by standards imposed by federal and State agencies, not local governments; thus, feasible mitigation is not available to reduce the Project's emissions of NO_x to below a level of significance. With respect to ROG emissions, a majority of the Project's ROG emissions (84.6%) are associated with area sources such as architectural coatings and consumer products. ROG emissions from consumer product (i.e., solvents used in cleaning supplies, kitchen aerosols, cosmetics, and toiletries) make up most of the area source emissions (approximately 88%). As with mobile sources, consumer products cannot be regulated by the County of Riverside. CARB is primarily responsible for controlling pollution from consumer products. Impacts would be significant and unavoidable on both a direct and cumulatively-considerable basis. Additionally, because Project operational-related emissions would exceed the SCAQMD Regional Thresholds and because the Project's proposed land uses are not consistent with the growth forecasts included in the 2016 SCAQMD AQMP, the Project also would result in a significant and unavoidable direct and cumulatively-considerable impact due to a conflict with the 2016 SCAQMD AQMP.



- Greenhouse Gas (GHG) Emissions: Significant and Unavoidable Cumulatively-Considerable Impact. Implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2 would ensure that the proposed Project is fully consistent with the Riverside County CAP Update (November 2019) by requiring the Project Applicant to demonstrate that implementing building permit applications have incorporated measures to achieve a minimum of 100 points pursuant to the CAP Update Screening Tables, and by requiring the Project Applicant to demonstrate that a minimum of 20% of the Project's energy demand would be met through renewable energy production. Notwithstanding, even with implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2, it cannot be ensured that the Project's GHG emissions would be reduced to below the CAP Update screening level threshold of 3,000 metric tons of carbon dioxide equivalent per year (MTCO_{2e}). Because the Project's emissions cannot be reduced to below the CAP Update screening threshold of 3,000 MTCO_{2e}/yr, Project impacts due to direct or indirect GHG emissions are conservatively evaluated as a significant and unavoidable impact of the proposed Project for which additional feasible mitigation measures are not available.
- Transportation: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. The Existing Plus Project generated VMT per employee is 22.76, which would exceed the County's adopted threshold of 14.24 VMT per employee by approximately 60 percent. Mitigation Measure MM 4.18-1 requires that a VMT assessment be prepared for future implementing developments (i.e., plot plans, conditional use permits, etc.) in order to identify feasible site-specific TDM strategies that would serve to reduce VMT, while Mitigation Measure MM 4.18-2 requires future owner users and tenants to participate in Riverside County's Rideshare Program. However, inclusion of such VMT reduction measures in areas that are characteristically suburban in context are limited to a maximum VMT reduction of 15%. This maximum reduction for cross-category transportation-related mitigation measures of 15% for suburban settings is also noted in the County Guidelines. Therefore, even with the implementation of all feasible VMT reduction measures, Project-generated VMT cannot be reduced to a level of less than significant.



Table S-1 Summary of Impacts, Mitigation Measures, and Conclusions

Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
4.1 Aesthetics				
<p>Threshold a: There are no officially-designated scenic highway corridors within the Project’s viewshed, however, the proposed Project would be prominently visible from nearby segments of I-15. Although this represents a substantial change to views along this State-eligible facility, development on site would be required to comply with the development standards and design guidelines included as part of proposed SP 333A1, which have been designed to ensure that the property is developed in a manner that is not aesthetically offensive. Design guidelines included as part of SP 333A1 include guidance related to site design, architecture, and landscaping, compliance with which would be assured by the County’s future review of implementing applications (e.g., plot plans, building permits, etc.).</p>	Less Than Significant	<p>CRDR 4.1-1 The Project is required to comply with Riverside County Ordinance No. 655, which is intended to restrict the permitted use of certain light fixtures emitting light into the night sky which could have a detrimental effect on astronomical observation and research. Ordinance No. 655 sets forth requirements for lamp source and shielding of light emissions for outdoor fixtures to reduce “skyglow” or light pollution that affects day or nighttime views from the Mount Palomar Observatory (located approximately 36.5 miles south of the project site in northern San Diego County). pursuant to the requirements of Ordinance No. 655, all lighting shall consist of low-pressure sodium lighting, or other lamp types that emit 4050 lumens or less. if light fixtures are proposed above 4050 lumens, then the lighting shall be fully shielded in conformance with the requirements of ordinance no. 655.</p>	Project Applicant/ Building and Safety Department	Prior to issuance of building permits
<p>Thresholds b and c: Although development of the Project site as proposed would represent a substantial change to the visual character of the site, the Project site does not contain any scenic resources, including but not limited to, trees, rock outcroppings, or landmark features. Project impacts to scenic resources and visual quality would be less than significant with mandatory compliance with the provisions of SP 333A1 and the SP 333A1 zoning ordinance.</p>	Less Than Significant	<p>CRDR 4.1-2 The Project is required to comply with Riverside County Ordinance No. 915, which is intended to provide minimum requirements for outdoor lighting in order to reduce light trespass. Ordinance No. 915 provides regulations on adequate lighting shielding, glare, and light trespass in order to ensure all development in Riverside County installs lighting in a way that does not jeopardize the health, safety, or general welfare of Riverside County residents and degrade their quality of life.</p>	Project Applicant/ Building and Safety Department	Prior to issuance of building permits
<p>Threshold d: The Project site is located within the limits of “Zone B” of the Mt. Palomar Observatory Lighting Policy Area. All development projects within Zone B of the Mt. Palomar Nighttime Lighting Policy Area are required to adhere to the requirements of Riverside County Ordinance No. 655, which controls artificial lighting sources to protect</p>	Less Than Significant	<p>CRDR 4.1-3 The Project is required to comply with the Development Standards and Design Guidelines of SP 333A1, including standards related to lighting. Compliance with these Design Guidelines would be assured by the County’s future review of implementing building permit applications for compliance with the Specific Plan’s design features that would</p>	Project Applicant/ Planning Department, Building and Safety	Prior to approval of implementing developments (i.e., plot plans, conditional use permits, etc.) and



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>the Observatory. No building permits would be issued by the County unless the building permit applications demonstrate consistency with the applicable provisions of Ordinance No. 655. As such, the Project has no potential to interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655, and impacts would be less than significant.</p> <p>Thresholds e and f: Future development on the Project site would be subject to Riverside County Ordinance No. 915 as well as the development standards and design guidelines of SP 333A1. Ordinance No. 915 requires that all outdoor luminaires shall be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way. Compliance with Ordinance No. 915 would be assured through future review of building permit applications by Riverside County, and would ensure that the Project does not expose residential property to unacceptable light levels. Impacts would be less than significant.</p>	<p>Less Than Significant</p>	<p>serve to reduce and/or avoid impacts relating to aesthetics.</p>	<p>Department</p>	<p>prior to issuance of building permits.</p>
<p>4.2 Agriculture and Forestry Resources</p> <p>Threshold a: The Project would result in the conversion of approximately 80.0 acres of “Farmland of Local Importance” to non-agricultural use. Feasible mitigation measures are not available for the Project’s conversion of approximately 80.0 acres of “Farmland of Local Importance” to non-agricultural use. Although it may be possible in some circumstances for impacts to agricultural land to be partially mitigated through the acquisition of off-site properties and placing such properties into permanent agricultural easements (i.e., compensatory mitigation), in this case such compensatory mitigation does not meet any of the definitions of mitigation as provided by State CEQA</p>	<p>Significant and Unavoidable</p>	<p>CRDR 4.2-1 In the event that zoning changes are approved in the Project vicinity to establish new agriculturally-zoned lands as defined by Riverside County Ordinance No. 625, the provisions of Ordinance No. 625 would apply. Ordinance No. 625 requires that when lands are developed adjacent to properties zoned primarily for agricultural purposes (that support agricultural operations that have been in place for at least three years and not considered a nuisance operation at the time the operation began), future land buyers must be notified of any agricultural operations that are ongoing in the area, and mandate that such agricultural uses shall not be the subject of nuisance complaints.</p>	<p>Project Applicant/ Planning Department</p>	<p>Prior to issuance of building permits</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>Guidelines § 15370. Accordingly, a direct and cumulatively-considerable impact due to the conversion of Farmland to non-agricultural use would occur for which no feasible mitigation is available. Thus, impacts would be significant and unavoidable.</p> <p>Threshold b: Under existing conditions, the Project site is not zoned for agricultural use. There are no lands zone primarily for agricultural use, as defined by Ordinance No. 625, within the Project vicinity. Additionally, according to Riverside County GIS, there are no agricultural preserves or Williamson Act contracted land within the Project vicinity. As such, the Project would not conflict with existing agricultural zoning, nor does the Project have potential to result in conflicts with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve. Thus, impacts would be less than significant.</p> <p>Threshold c: Based on the definition of “land zoned for primarily agricultural purposes” provided in Riverside County Ordinance No. 625, there are no agriculturally-zoned properties within 300 feet of the Project site. Accordingly, the Project would not cause development of non-agricultural uses within 300 feet of agriculturally zoned property, and no impact would occur.</p> <p>Threshold d: Aside from the Project’s impacts to “Farmland” as discussed under the analysis of Threshold a., there are no components of the Project that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use. Thus, impacts would be less than significant.</p> <p>Thresholds e, f and g: There are no forest lands in the</p>	<p>Less Than Significant</p> <p>No Impact</p> <p>Less Than Significant</p> <p>No Impact</p>			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>Project vicinity, and no lands in the Project vicinity are zoned for timberland, timberland production, or forest uses. The Project would not result in the conversion of forest land to non-forest use. No impact would occur</p>				
<p>4.3 Air Quality</p>				
<p>Threshold a: Project-related construction activities have the potential to exceed the SCAQMD Regional Threshold of significance for NO_x, and under long-term operational conditions the Project has the potential to exceed the SCAQMD Regional Thresholds of significance for ROG and NO_x. Additionally, the Project would not be consistent with the population, housing, and employment growth projections utilized in the preparation of the 2016 AQMP. Implementation of Mitigation Measures MM 4.3-1 and MM 4.3-2 would reduce the Project’s construction-related air quality emissions to below the SCAQMD Regional Thresholds. However, even with implementation of Mitigation Measures MM 4.3-3 through MM 4.3-7, the Project’s long-term operational emissions of ROG_s and NO_x, both of which also are ozone precursors, would remain above the SCAQMD Regional Thresholds. As such, the Project would potentially delay the timely attainment of the O₃ air quality standard and/or the AQMP emission reduction requirements. Additionally, the Project’s proposed land uses are not consistent with the growth forecasts included in the 2016 SCAQMD AQMP. Thus, Project direct and cumulatively-considerable impacts due to a conflict with or obstruction of the SCAQMD 2016 AQMP would be significant and unavoidable</p>	<p>Significant and Unavoidable Direct and Cumulatively-Considerable Impact</p>	<p>MM 4.3-1 As a condition of issuing grading or building permits, Riverside County shall require that the following measures be implemented during all construction activities on site:</p> <ul style="list-style-type: none"> • Any construction equipment used in Project construction and with a horsepower rating greater than 75 horsepower shall be California Air Resources Board (CARB) Tier 4 Certified, as set forth in Section 2423 of Title 13 of the California Code of Regulations, and Part 89 of Title 40 of the Code of Federal Regulations. • All future construction activities on site shall adhere to the germane policy provisions in the County of Riverside Board of Supervisors Good Neighbor Policy for Logistics and Warehouse/Distribution Uses, whether said project proposes buildings of 250,000 square feet or not. Germane provisions include, but are not limited to, the following: <ul style="list-style-type: none"> a. During construction activities on site, all heavy-duty haul trucks accessing the site shall have CARB-approved 2010 engines or newer approved CARB engine standards. b. All excavators, graders, rubber-tired dozers, and similar “off-road” construction equipment shall be CARB Tier 3 Certified engines or better. c. The maximum daily disturbance area (actively graded area) shall not exceed 10 acres per day. 	<p>Project Applicant, Construction Contractor/ Building and Safety Department, Riverside County Sheriff’s Department</p>	<p>Prior to issuance of permits for blasting activities</p>
<p>Threshold b: For both the Primary Land Use Plan and the Alternative Land Use Plan, emissions resulting from Project construction have the potential to exceed the SCAQMD Regional Threshold of 100 pounds per day for NO_x.</p>	<p>Significant and Unavoidable Direct and Cumulatively-</p>			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
		<p>minimum of 5 percent of the passenger car parking spaces.</p> <p>MM 4.3-5 All on-site outdoor cargo handling equipment (including yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site equipment) shall be required to be powered by electricity, compressed natural gas, propane, or diesel-fueled engines that comply with the CARB/USEPA Tier 4 Engine standards for off-road vehicles or better (defined as emitting less than or equal to 0.015 grams per brake horsepower-hour [g/bhp-hr] for PM10) and all indoor cargo handling equipment shall be required to be powered by electricity, compressed natural gas, or propane. Use of indoor diesel-fueled equipment shall be prohibited. Developer and all successors also shall include these obligations in all building leases. The building owner and occupant shall allow periodic inspection of the site by the County of Riverside or its designee to confirm compliance. Electrical panels should be appropriately sized to allow for future expanded use.</p> <p>MM 4.3-6 In order to promote alternative fuels, and help support “clean” truck fleets, as part of future lease agreements the developer/successor-in-interest shall be required to provide building occupants with information related to SCAQMD’s Carl Moyer Program, or other such programs that promote truck retrofits or “clean” vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. Tenants shall be notified about the availability of: 1) alternatively fueled cargo handling equipment; 2) grant programs for diesel-fueled vehicle engine retrofit and/or replacement; 3) designated truck parking locations in the project vicinity; 4) access to alternative fueling stations proximate to the site that supply compressed natural gas; and 5) the United States Environmental Protection Agency’s SmartWay program.</p>	<p>Project Applicant, Successors in Interest/ Building and Safety Department, Code Enforcement Department</p> <p>Project Applicant, Future Site Occupants/ Planning Department</p>	<p>During long-term site operations</p> <p>During long-term site operations</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
		<p>MM 4.3-7 All future operations on site shall adhere to the germane policy provisions in the Riverside County Board of Supervisors Policy F-3 (“Good Neighbor Policy” for Logistics and Warehouse/Distribution Uses). Applicable requirements of Policy F-3 shall be specified in future lease agreements with all future tenants, and future tenants shall be required to permit periodic inspection by Riverside County to ensure compliance. In addition, buildings smaller than 250,000 square feet shall comply with applicable policy provisions of the Good Neighbor Policy except as indicated below. Applicable feasible provisions of the Good Neighbor Policy that would serve to measurably reduce Project-related operational emissions include, but are not limited to, the following:</p> <ul style="list-style-type: none"> Warehouse/distribution facilities greater than 250,000 square feet shall be designed to provide adequate on-site parking for commercial trucks and passenger vehicles and on-site queuing for trucks that is away from sensitive receptors. The general queuing and spill-over of trucks onto surrounding public streets shall be prevented. Commercial trucks shall not be parked in the public road right-of-way or nearby residential areas. Facility operators shall maintain records of their fleet equipment and ensure that all diesel-fueled Medium-Heavy Duty Trucks (“MHDT”) and Heavy-Heavy Duty Trucks (“HHDT”) accessing the site use year CARB 2010 or newer engines. The records shall be maintained on-site and be made available for inspection by the County. Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources 	Project Applicant, Future Occupants/ Planning Department	During long-term site operations



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
		<p>Board (CARB) anti-idling regulations. At a minimum each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than five minutes; and 3) telephone numbers of the building facilities manager and CARB to report violations.</p> <ul style="list-style-type: none"> • Facility operators shall train their managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. • Signs shall be posted in the appropriate locations and/or handouts should be provided that show the locations of nearest food options, fueling, truck maintenance services, and other similar convenience services. • Each Facility shall designate a Compliance Officer responsible for implementing the measures described herein and/or in the project conditions of approval and mitigation measures. Contact information shall be provided to the County and updated annually, and signs shall be posted in visible locations providing the contact information for the Compliance Officer to the surrounding community. • The future applicants for any new facility larger than 250,000 square feet shall be required to enter into agreement with the County of Riverside to provide a supplemental funding contribution, which would be applied to further off set potential air quality impacts to the community and provide a community benefit. Said financial contribution will be determined by the Transportation and Land Management Agency based on the level of NOx emissions estimated to generated. Said 		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
		<p>supplemental funding contribution will be collected on a one-time basis. Funds collected under said supplemental funding program will be subject to designation for use by the Board of Supervisors and will generally be used for projects that directly benefit the impacted community wherein the project is located. The types of projects that the Board of Supervisors may designate for use of these funds include, but are not limited to (1) projects that directly offset NO_x reductions above and beyond what is required by existing air quality regulations, (2) projects that generally improve air quality such as paving of dirt roads, installation of additional trees and landscaping, (3) projects that provide an enhanced buffer between the new facility and sensitive receptors, and (4) Projects that lead to reduced emissions by promoting alternate forms of transportation such as bicycle lanes, new sidewalks, bus turnouts, or other transit-related uses.</p> <p>CRDR 4.3-1 The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 403, “Fugitive Dust” by implementing the following dust control measures during construction activities, such as earth moving activities, grading, and equipment travel on unpaved roads. Prior to grading permit issuance, the County shall verify that the following notes are included on the grading plan. Project contractors shall be required to ensure compliance with the notes and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. These notes also shall be specified in bid documents issued to prospective construction contractors.</p> <ul style="list-style-type: none"> All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per 	<p>Project Applicant, Construction Contractors/ Building and Safety Department</p>	<p>During construction activities</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
		<p>hour (mph) per SCAQMD guidelines in order to limit fugitive dust emissions.</p> <ul style="list-style-type: none"> The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the midmorning, afternoon, and after work is done for the day. The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 mph or less. <p>CRDR 4.3-2 The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 1113, Architectural Coatings, by requiring that all architectural coatings must consist of low VOCs (i.e., VOCs of less than 50 grams per liter [g/L]) unless otherwise specified in the Rule 1113.</p> <p>CRDR 4.3-3 The Project is required to comply with applicable SCAQMD rules for construction activities on the Project site. In addition to the SCAQMD requirements listed above, additional SCAQMD Rules that are currently applicable during construction activity for this Project include but are not limited to: Rule 1403 (Asbestos); Rule 431.2 (Low Sulfur Fuel); and Rule 1186 / 1186.1 (Street Sweepers).</p> <p>CRDR 4.3-4 The Project is required to comply with the provisions of SCAQMD Rule 402, “Nuisance” which requires that a person shall not discharge air contaminants or other materials that would cause health or safety hazards to any considerable number of persons or the public.</p>	<p>Project Applicant, Construction Contractors/ Building and Safety Department, SCAQMD</p> <p>Project Applicant, Construction Contractors, Future Occupants/ SCAQMD</p> <p>Project Applicant, Construction Contractors/ Building and Safety Department,</p>	<p>During construction activities and during long-term building maintenance</p> <p>During construction activities and during long-term building maintenance</p> <p>During construction activities and long-term operations</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
			SCAQMD	
4.4 Biological Resources				
<p>Threshold a: The proposed Project would not conflict with the SKR HCP, with the mandatory payment of fees pursuant to Riverside County Ordinance No. 663. The Project would not result in a conflict with the MSHCP Reserve Assembly requirements. Impacts to 4.90 acres of riverine resources were previously mitigated in compliance with the previously-approved DBESP for Project, while impacts to an additional 0.05 acre of riparian areas would be mitigated to less-than-significant levels with implementation of Mitigation Measures MM 4.4-6 and MM 4.4-7. With mitigation, Project impacts due to a conflict with Volume I, Section 6.1.2 of the MSHCP would be less than significant. The Project would not result in impacts to narrow endemic plants, and thus would be consistent with Volume I, Section 6.1.3 of the MSHCP. Implementation of Mitigation Measure MM 4.4-1 would ensure that measures are incorporated into the Project’s construction phase to preclude significant construction-related nighttime lighting impacts affecting the proposed on-site MSHCP Conservation Area, while Mitigation Measure MM 4.4-2 would ensure that measures are incorporated into future development plans for the site, if necessary, to ensure that future on-site operations do not expose the proposed on-site MSHCP Conservation Area to noise levels exceeding 65 dBA CNEL. Thus, with implementation of Mitigation Measures MM 4.4-1 and MM 4.4-2, the Project would be fully consistent with Section 6.1.4 of the MSHCP. In addition, implementation of Mitigation Measure MM 4.4-3 would ensure that appropriate pre-construction surveys are conducted prior to ground disturbing activities, in accordance with MSHCP Objective 6 for the burrowing owl. With implementation of the required mitigation, the</p>	<p>Less than Significant with Mitigation</p>	<p>MM 4.4-1 In the event that nighttime construction is proposed as part of future building permits, then prior to commencement of nighttime construction activities, the Property Owner/Developer shall provide evidence to the County that the Contractor Specifications require that any temporary nighttime lighting installed during construction shall be downward facing and hooded or shielded to prevent security light from spilling outside the staging area or from directly broadcasting security light into the sky, onto adjacent residential properties, or into the open space areas within Planning Areas 5 and 6. Project contractors shall be required to permit periodic inspection of the construction site by Riverside County staff or its designee to confirm compliance.</p> <p>MM 4.4-2 Prior to approval of implementing developments (i.e., plot plans, building permits, etc.) affecting lands adjacent to the on-site MSHCP Conservation Areas (i.e., proposed Conservation Areas within Planning Areas 5 and 6 of the Renaissance Ranch Commerce Center Specific Plan No. 333, Amendment No. 1), the Project Applicant shall prepare and Riverside County shall review and approve an acoustical analysis to determine whether long-term operational noise associated with the implementing development would expose the proposed MSHCP Conservation Areas to noise levels exceeding 65 dBA CNEL. In the event that the analysis shows that future site operations would expose the Conservation Areas to noise levels exceeding 65 dBA CNEL, the required acoustical analysis shall incorporate recommendations to reduce Project-related operational noise affecting the Conservation Areas to below 65 dBA CNEL. Noise attenuation measures may include, but are not necessarily limited to, the incorporation of screen walls or other barriers (such as berms). Prior to issuance of building permits, the Riverside County Building and Safety Department shall ensure that any required noise attenuation</p>	<p>Project Applicant, Construction Contractors/ Building and Safety Department</p> <p>Project Applicant, Project Acoustical Consultant/ Planning Department</p>	<p>Prior to commencement of activities involving nighttime construction and during nighttime construction activities</p> <p>Prior to approval of implementing developments (i.e., plot plans, building permits, etc.) affecting lands adjacent to the on-site MSHCP Conservation Areas (i.e., proposed Conservation Areas within Planning Areas 5 and 6 of the Renaissance Ranch Commerce Center Specific</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
		<p>Project Applicant shall secure amended regulatory permits and agreements from the U.S. Army Corps of Engineers, the California Department of Fish and Wildlife, and the Santa Ana Regional Water Quality Control Board. Copies of each of these permits and agreements shall be provided to the County Environmental Programs Department (EPD) before grading occurs within State or federal jurisdictional waters.</p> <p>MM 4.4-7 Prior to issuance of grading permits, the Project Applicant shall mitigate additional impact to 0.05 acre of MSHCP Riparian habitat located south of the Project near Bolo Court through the purchase of 0.075 acre of re-establishment credits (a 1.5:1 mitigation-to-impact ratio) and 0.075-acre of rehabilitation mitigation credits (a 1.5:1 mitigation-to-impact ratio) at the Riverpark Mitigation Bank in accordance with the Project’s Determination of Biologically Superior or Equivalent Preservation (DBESP), dated October 2021 (Technical Appendix C2 to the Project’s Environmental Impact Report). Evidence demonstrating compliance with this measure, including supporting documentation, shall be submitted to the Riverside County Environmental Programs Department (EPD) to verify that impacts have been fully mitigated prior to issuance of grading permits.</p> <p>CRDR 4.1-1 Prior to issuance of grading permits, the Project Applicant shall make payment of Western Riverside County MSHCP fees pursuant to Riverside County Ordinance No. 810, <i>Establishing an Interim Open Space Mitigation Fee</i>.</p> <p>CRDR 4.1-2 Prior to issuance of grading permits, the Project Applicant shall make payment of fees pursuant to the Stephen’s Kangaroo Rat Habitat Conservation Plan and Riverside County Ordinance No. 663, <i>Establishing the Riverside County Stephens’ Kangaroo Rat Habitat Conservation Plan and Setting Mitigation Fees</i>.</p>	<p>Environmental Programs Department, U.S. Army Corps of Engineers, CDFW, Santa Ana RWQCB</p> <p>Project Applicant/ Environmental Programs Department, U.S. Army Corps of Engineers, CDFW, Santa Ana RWQCB</p> <p>Project Applicant/ Planning Department</p> <p>Project Applicant/ Planning Department</p>	<p>Prior to issuance of grading permits</p> <p>Prior to issuance of grading permits</p> <p>Prior to issuance of grading permits</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
		<p>CRDR 4.1-3 As a condition of approval for future grading and building permits, the County of Riverside shall require that the Project Applicant must delineate areas planned for long-term conservation as open space (i.e., open space within Planning Areas 5 and 6 of the Renaissance Ranch Commerce Center Specific Plan No. 333, Amendment No. 1) with construction fencing in order to preclude direct and indirect impacts to sensitive biological resources within the open space areas.</p> <p>CRDR 4.1-4 Prior to issuance of grading permits affecting waters of the U.S. and/or waters of the State, the Project Applicant shall secure amended regulatory permits and agreements from the U.S. Army Corps of Engineers, the California Department of Fish and Wildlife, and the Santa Ana Regional Water Quality Control Board. The amendments to these permits and agreements are required to reflect revisions to the description of the proposed Project, although no changes are proposed to areas planned for physical impacts, and no new or modified mitigation is required as part of the required amendments. Copies of each of these permits and agreements shall be provided to the County Environmental Programs Department before grading occurs within State or federal jurisdictional waters.</p>	<p>Project Applicant, Construction Contractors/ Building and Safety Department</p> <p>Project Applicant, Construction Contractors/ Building and Safety Department, U.S. Army Corps of Engineers, CDFW, RWQCB</p>	<p>Prior to issuance of grading permits</p> <p>Prior to issuance of grading permits</p>
4.5 Cultural Resources				
<p>Thresholds a and b: Although no significant historical resources, as defined by the CRHR and CEQA, were identified as part of the Project’s CRA, there is a potential for previously-undiscovered historical resources to occur on the site surface or beneath the surface of areas planned for physical impact (i.e., grading) as part of the Project. Implementation of Mitigation Measures MM 4.5-1 through MM 4.5-7 would ensure that a Project Archaeologist would be present during ground-disturbing activities, and would ensure that any significant historical resources that may be uncovered are appropriately treated as recommended by the</p>	<p>Less Than Significant with Mitigation Incorporated</p>	<p>MM 4.5-1 The applicant/developer shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring Program (CRMP). A CRMP shall be developed in coordination with the consulting tribe(s) that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural, tribal cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. A fully executed copy of the contract and a digitally-</p>	<p>Project Applicant, Project Archaeologist/ County Archaeologist, Planning Department</p>	<p>Prior to issuance of grading permits and during grading activities</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>Project Archaeologist. With implementation of the required mitigation, impacts would be reduced to less-than-significant levels.</p> <p>Thresholds c and d: Based on the results of the Project’s CRA, the Project site does not contain any known archaeological sites or resources. However, Mitigation Measures MM 4.5-1 through MM 4.5-7 would ensure that any previously-undiscovered archaeological sites or resources identified on site or within the off-site improvement areas during ground-disturbing activities are appropriately treated as directed by the Project Archaeologist, County Archaeologist, and Native American Monitor. With implementation of the required mitigation, impacts would be reduced to less-than-significant levels.</p> <p>Threshold e: The Project site does not contain a cemetery and no known cemeteries are located within the immediate site vicinity. However, in the event that human remains are discovered during construction activities, Mitigation Measure MM 4.5-8 would require the Project Applicant to comply with the applicable provisions of California Health and Safety Code § 7050.5 and California Public Resources Code § 5097 et. seq. Mandatory compliance with Mitigation Measure MM 4.5-8, State law, and applicable regulatory requirements would reduce the Project’s potential impacts to buried human remains to less-than-significant-levels.</p>	<p>Less Than Significant with Mitigation Incorporated</p> <p>Less Than Significant with Mitigation Incorporated</p>	<p>signed copy of the agreement shall be provided to the County Archaeologist to ensure compliance with this condition of approval. Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The Project Archaeologist may submit a detailed letter to the County of Riverside during grading requesting a modification to the monitoring program if circumstances are encountered that reduce the need for monitoring.</p> <p>MM 4.5-2 Prior to the issuance of a grading permit, the Project Applicant shall enter into a monitoring agreement with a Native American Monitor. A Native American Monitor shall be on-site during all initial ground disturbing activities in previously undisturbed soil. In conjunction with the Project Archeologist, the Native American Monitor shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The Project Applicant shall submit a fully executed copy of the agreement to the Riverside County Planning Department to ensure compliance with this condition.</p> <p>MM 4.5-3 Prior to the issuance of a grading permit, the Project Applicant or construction contractor shall provide evidence to Riverside County that the construction site supervisors and crew members involved with grading operations are trained during a mandatory pre-grading meeting by the Project Archaeologist and Native American Monitor to recognize archaeological or historical resources should such resources be unearthed during ground-disturbing construction activities. Training shall include a brief review of cultural sensitivity of the Project and surrounding area;</p>	<p>Project Applicant, Project Archaeologist/ County Archaeologist, Tribal Monitors, Planning Department</p> <p>Project Applicant, Project Archaeologist/ County Archaeologist, Tribal Monitors, Planning Department</p>	<p>Prior to issuance of grading permits and during grading activities</p> <p>Prior to issuance of grading permits and during grading activities</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
		<p>what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols as determined by the County-approved Project Archaeologist. If a suspected archaeological or historical resource is identified on the property, the construction supervisor shall be required by contract to immediately halt and redirect grading operations in a 60-foot radius around the find and seek identification and evaluation of the suspected resource by the Project Archaeologist. This requirement shall be noted on all grading plans and the construction contractor shall be obligated to comply with the note. The Project Archaeologist shall evaluate the suspected resource and make a determination of significance pursuant to California Public Resources Code Section 21083.2.</p> <p>MM 4.5-4 During the original cutting of previously-undisturbed deposits, the archaeological monitor(s) and tribal representative shall be on-site, as determined by the Project Archaeologist, to perform periodic inspections of the excavations. The frequency of inspections will depend upon the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The Project Archaeologist shall have the authority to modify the monitoring program if the potential for cultural resources appears to be less than anticipated.</p> <p>MM 4.5-5 In the event that previously unidentified archaeological or historical resources are discovered, the Project Archaeologist shall have the authority to divert or temporarily halt ground disturbance operation within 100 feet of the area of discovery to allow for the evaluation of potentially significant cultural resources. The Project Archaeologist shall contact the Lead Agency (Riverside County) at the time of discovery. The Project Archaeologist, in consultation with the County Archaeologist,</p>	<p>Project Applicant, Project Archaeologist/ Tribal Monitor, County Archaeologist, Planning Department</p> <p>Project Applicant, Project Archaeologist/ Tribal Monitor, County Archaeologist, Planning Department</p>	<p>During the original cutting of previously-undisturbed deposits</p> <p>In the event that previously unidentified archaeological or historical resources are discovered during grading activities</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
		<p>shall determine the significance of the discovered resources. The Lead Agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the Project Archaeologist and approved by the Lead Agency before being carried out using professional archaeological methods. If any human bones are discovered, the county coroner and lead agency shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains. Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The Project Archaeologist shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to Riverside County upon the completion of a treatment plan and final report detailing the significance and treatment finding.</p> <p>MM 4.5-6 If any cultural or historical material is discovered on the property, all cultural and/or historical material collected during the grading monitoring program shall be processed and curated according to the current professional repository standards and the Project Applicant shall relinquish ownership of all cultural resources (with the exception of sacred items, burial goods, and Human Remains), including all archaeological and historical artifacts and non-human remains, as part of the required mitigation for impacts to cultural and historical resources. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be</p>	<p>Project Applicant, Project Archaeologist/ County Archaeologist, Planning Department</p>	<p>In the event cultural or historical material is discovered on the property</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
		<p>accompanied by payment of the fees necessary for permanent curation, or the artifacts may be delivered to the Native American representative if that is recommended by Riverside County. Evidence of compliance with this mitigation measure shall be provided to the Riverside County Planning Department in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.</p> <p>MM 4.5-7 Prior to final grading inspection, in the event any resources are found on-site during construction activities, a final report documenting the field and analysis results, and interpreting the artifact and research data within the research context, shall be completed and submitted to the satisfaction of Riverside County. The report will include (at a minimum) the following: a discussion of the monitoring methods and techniques used; the results of the monitoring program including any artifacts recovered; an inventory of any resources recovered; updated Department of Parks and Recreation Primary and Archaeological Site Forms for any new resources identified, and all sites affected by the development; final disposition of the resources including GPS data; artifact catalog; and any additional recommendations as may be determined by Riverside County. A final copy shall be submitted to the Riverside County Planning Department, the Project Applicant, the Eastern Information Center, and the affected Tribe (if Native American resources are uncovered).</p> <p>MM 4.5-8 In the event that human remains are discovered, pursuant to California Health and Safety Code § 7050.5, as well as the Public Resources Code § 5097 et. seq., the Project Archaeologist shall have the authority to divert or temporarily halt ground disturbance operation within 100 feet the area of discovery to allow for the evaluation of the human remains and the surrounding vicinity. If any human remains are discovered, the County Coroner and lead agency shall be contacted. The County</p>	<p>Project Applicant, Project Archaeologist/ County Archaeologist, Planning Department</p> <p>Project Applicant, Project Archaeologist/ County Archaeologist, Planning Department, NAHC, County</p>	<p>Prior to final grading inspection in the event that cultural resources are uncovered during grading activities</p> <p>In the event that human remains are discovered during grading activities</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
		<p>Coroner shall determine that no investigation of the cause of death is required, and determine if the remains are of Native American origin. In the event that the remains are determined to be of Native American origin, the NAHC shall be contacted within 24 hours of the discovery. The Most Likely Descendant, as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains. If the NAHC is unable to identify a Most Likely Descendant, or if the Most Likely Descendant failed to make a recommendation within 48 hours after being notified by the NAHC, or the Project Applicant rejects the recommendation of the Most Likely Descendant; the Project Applicant shall rebury the Native American human remains and associated grave goods on the property in a location not subject to further ground disturbance. Evidence of compliance with this mitigation measure, if human remains are found, shall be provided to Riverside County upon the completion of a treatment plan and final report detailing the significance and treatment finding.</p> <p>CRDR 4.1-5 Unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code Section 6254 (r), parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 6254 (r).</p>	<p>Coroner</p> <p>As required by Government Code Section 6254 (r)</p>	<p>As required by Government Code Section 6254 (r)</p>
<p>4.6 Energy</p>				
<p>Threshold a: Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. As such, Project impacts due to wasteful, inefficient, or unnecessary</p>	<p>Less Than Significant</p>	<p>CRDR 4.6-1 The following are applicable regulations and design requirements within the County of Riverside. Although these requirements technically do not meet CEQA’s definition for mitigation, they are imposed herein to ensure Project compliance with applicable City regulations and design requirements.</p>	<p>N/A</p>	<p>N/A</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>consumption of energy resources would be less than significant.</p> <p>Threshold b: Energy consumed by the Project’s operation is calculated to be comparable to, or less than, energy consumed by other warehouse projects of similar scale and intensity that are operating in California, as the Project would be subject to current regulatory requirements, such as the 2019 version of Title 24, which was not in effect when most existing developments were constructed. Additionally, Moreover, the Project would be subject to compliance with the Riverside County CAP and would be required to achieve a minimum of 100 points per the CAP screening tables, which would further reduce the Project’s energy demand. Thus, impacts would be less than significant.</p>	Less Than Significant	<ul style="list-style-type: none"> Pavley Fuel Efficiency Standards (AB1493). Establishes fuel efficiency ratings for new vehicles. Renewable Portfolio Standards (SB 100). Increases California’s RPS requirement to 50% renewable resources target by December 31, 2026, and to achieve a 60% target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours (kWh) of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the Department of Food and Agriculture (CDFA), and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal. CCR Title 13, Motor Vehicles, Section 2449(d)(3), Idling. Grading plans shall reference the requirement that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling. 		
4.7 Geology and Soils				
Thresholds a and c: The Project site is not subject to fault hazards, as none occur on site. However, the Project as	Less Than Significant with	MM 4.7-1 Prior to approval of any future implementing developments within the 157.1-acre Project site (e.g., tentative	Project Applicant/	Prior to approval of any future



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>evaluated herein is limited to changes in the land use designations and zoning classifications for the 157.1-acre Project site. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address seismic-related hazards in conformance with the CBSC and the Riverside County Building Code. Thus, impacts would be less than significant with mitigation incorporated.</p> <p>Threshold b: Based on the absence of a shallow groundwater table in the older fan deposits, the dense to very dense nature of the older fan, the potential for liquefaction and for seismic (i.e., dynamic) settlement, in the form of dry sand settlement, are anticipated to be very low. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address any localized liquefaction hazards that may be identified in areas subject to grading and development. Thus, impacts would be less than significant with mitigation incorporated.</p> <p>Threshold d: Impacts due to landslide hazards, lateral spreading, collapse hazards, and rockfall hazards could occur if proposed grading is not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address the potential for landslide hazards, lateral spreading, collapse hazards, and rockfall hazards. Thus, impacts would be less than significant with mitigation incorporated.</p>	<p>Mitigation Incorporated</p> <p>Less Than Significant with Mitigation Incorporated</p> <p>Less Than Significant with Mitigation Incorporated</p>	<p>tract maps, plot plans, etc.), updated site-specific geotechnical studies shall be prepared to evaluate grading and site work proposed as part of the future implementing developments. All future implementing projects shall be conditioned to require that the site-specific recommendations of the implementing geotechnical evaluations shall be incorporated into future grading and building permit applications. Future grading or building permits shall not be issued by the County unless the investigations required by Riverside County Ordinance Nos. 457 and 547 have been completed and the site-specific recommendations have been incorporated into the design of grading and/or building permits, as appropriate.</p> <p>MM 4.7-2 As a condition of grading permit issuance, any septic systems identified on site as part of the future-required geotechnical studies shall be removed in accordance with the standards and requirements of the Riverside County Department of Environmental Health (DEH).</p> <p>CRDR 4.7-1 The Project is required to comply with the provisions of County Ordinance Nos. 457, 460, and 547. Ordinance No. 457 requires that all projects comply with California Building Codes and the International Building Codes. These codes establish site-specific investigation requirements, construction standards, and inspection procedures to ensure that development does not pose a threat to the health, safety, and welfare of the public, and includes requirements related to erosion. Ordinance No. 460 sets forth soil erosion control requirements and requires preparation and implementation of a wind erosion control plan. In addition, Ordinance No. 547 requires that cases where a proposed project falls within an earthquake fault zone as shown on the maps prepared by the State Geologist, this Ordinance requires compliance with all of the provisions of the Alquist-Priolo Act and the adopted policies and criteria of Ordinance No. 547.</p>	<p>Building and Safety Department</p> <p>Project Applicant/ Building and Safety Department</p> <p>Project Applicant/ Building and Safety Department</p>	<p>implementing developments</p> <p>Prior to issuance of grading permit</p> <p>Prior to approval of building or grading permits</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>at a gradient steeper than 2:1 would be grossly stable. Thus, impacts would be less than significant with mitigation incorporated.</p> <p>Thresholds i and l: The Project Applicant does not propose any septic tanks or alternative waste water disposal systems, as sewer service to the Project site would be accommodated by the proposed sewer lines, force mains, and/or sewer lift stations that would convey sewer flows to the Horsethief Canyon WRF. However, based upon the historic and present property use, septic tanks (systems) may exist on the property. Implementation of Mitigation Measure MM 4.7-2 would ensure that any septic tanks that may be present on site are appropriately removed from the Project site in accordance with Riverside County DEH requirements. Thus, impacts would be less than significant with mitigation incorporated.</p> <p>Thresholds j and m: The Project would not result in substantial soil erosion or loss of topsoil. The Project Applicant would be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities and adhere to a Storm Water Pollution Prevention Plan (SWPPP) as well as SCAQMD Rule 403 and Riverside County Ordinance Nos. 457, and 460. Furthermore, the Project is required by law to implement a WQMP during operation, which would preclude substantial erosion impacts in the long-term. Thus, impacts would be less than significant.</p> <p>Threshold k: Impacts due to expansive soils could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies. Implementation of Mitigation Measure MM 4.7-1 would ensure that</p>	<p>Less Than Significant with Mitigation Incorporated</p> <p>Less Than Significant</p> <p>Less Than Significant with Mitigation Incorporated</p>			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
appropriate measures are incorporated into future grading and/or building permit applications to address expansive soils on site. Thus, impacts would be less than significant with mitigation incorporated.				
4.8 Greenhouse Gas Emissions				
<p>Threshold a: The Project would result in approximately 45,902 MTCO₂e/yr; thus, the proposed Project would exceed the County’s screening threshold of 3,000 MTCO₂e/year. Although the Project would be fully consistent with the Riverside County 2019 CAP Update with implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2, because the Project’s emissions cannot be reduced to below the CAP Update screening threshold of 3,000 MTCO₂e/yr, Project impacts due to direct or indirect GHG emissions are conservatively evaluated as a significant and unavoidable impact of the proposed Project for which additional feasible mitigation measures are not available.</p> <p>Threshold b: The Project would be consistent with or otherwise would not conflict with the CARB 2008 Scoping Plan and the CARB 2017 Scoping Plan. However, the Project has the potential to conflict with the Riverside County CAP Update if the Project were unable to achieve 100 points pursuant to the CAP Screening Tables. Implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2 would ensure that the proposed Project is fully consistent with the Riverside County CAP Update by requiring the Project Applicant to demonstrate that future implementing building permit applications have incorporated measures to achieve a minimum of 100 points pursuant to the CAP Update Screening Tables. Thus, Project impacts due to a potential conflict with the CAP Update would be reduced to less-than-significant levels.</p>	<p>Significant and Unavoidable Cumulatively-Considerable Impact</p> <p>Less Than Significant with Mitigation Incorporated</p>	<p>MM 4.8-1 Prior to approval of implementing development permit applications (i.e., plot plans, conditional use permits, etc.) and prior to building permit issuance, the Project Applicant shall demonstrate that appropriate building construction measures shall apply to achieve a minimum of 100 points per Appendix D to the Riverside County 2019 Climate Action Plan (CAP) Update. The conceptual measures anticipated for the Project are listed in Table 3-4 of the Project’s Air Quality Assessment (AQA), which is appended to this EIR as Technical Appendix B. The conceptual measures may be replaced with other measures as listed in the CAP Screening Tables (Appendix D to the CAP Update), as long as they are replaced at the same time with other measures that in total achieve a minimum of 100 points per Appendix D to the Riverside County CAP Update.</p> <p>MM 4.8-2 Pursuant to Riverside County Climate Action Plan Update Measure R2-CE1, prior to issuance of building permits, and in accordance with measure R2-CE1 of the County’s Climate Action Plan (CAP) Update, future implementing building permits that involve more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development shall be required to offset the energy demand through renewable energy production. Renewable energy production shall be onsite generation of at least 20% of energy demand for commercial, office, industrial or manufacturing development.</p>	<p>Project Applicant/ Planning Department</p> <p>Project Applicant/ Building and Safety Department</p>	<p>Prior to approval of implementing development permit applications (i.e., plot plans, conditional use permits, etc.) and prior to building permit issuance for Tenant Improvements</p> <p>Prior to issuance of building permits for Tenant Improvements and prior to final building inspection for Tenant Improvements</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
4.9 Hazards and Hazardous Materials				
<p>Thresholds a and b: The Project site does not contain any RECs under existing conditions. During construction of the proposed Project, compliance with applicable hazardous materials regulations would ensure that the Project would not create significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. With mandatory regulatory compliance, along with mandatory compliance with Riverside County Ordinance No. 651.5, potential hazardous materials impacts associated with long-term operation of the Project are determined to be less than significant and mitigation is not required.</p> <p>Threshold c: The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. Additionally, there are no emergency response plans or emergency evacuation plans in effect in the local area. Improvements planned as part of the Project are not anticipated to adversely affect traffic operations in the local area, including along nearby segments of Horsethief Canyon Road. Moreover, the Project would construct a new roadway on site (i.e., Street A), which would serve to improve emergency access in the local area. As such, no impact would occur.</p> <p>Threshold d: The Project has the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, and/or wastes within 0.25-mile of an existing school (Luiseño Elementary School). However, future site operations would be subject to regulatory requirements requiring preparation of a Hazardous Materials Business Emergency Plan (HMBEP) for certain future implementing uses, if required by law</p>	<p>Less Than Significant</p> <p>No Impact</p> <p>Less Than Significant</p>	<p>CRDR 4.9-1 All future businesses operating on the site would be subject to compliance with Riverside County Ordinance No. 651.1, which sets forth requirements for handling hazardous materials, requires a permit for handling certain types and quantities of hazardous materials, requires businesses to report their hazardous materials inventory, identifies different classifications of hazardous materials handlers, and requires reporting of spills or releases or threatened releases of a hazardous material to the Riverside County Department of Environmental Health (DEH) and to the Governor’s Office of Emergency Services.</p> <p>CRDR 4.9-2 All future contracts with construction contractors shall comply with all applicable regulations and requirements promulgated by the federal Occupational Safety and Health Administration (OSHA).</p> <p>CRDR 4.9-3 The Project shall comply with Title 22, Division 4.5 of the California Code of Regulations, which requires residents and employees to dispose of household hazardous waste, including pesticides, batteries, old paint, solvents, used oil, antifreeze, and other chemicals, at a Household Hazardous Waste Collection Facility.</p> <p>CRDR 4.9-4 The Project shall comply with Title 22, Division 4.5, Chapter 11 of the California Code of Regulations which requires fluorescent lamps, batteries, and mercury thermostats be recycled or taken to a Household Hazardous Waste Collection Facility.</p> <p>CRDR 4.9-5 Prior to the issuance of any new occupancy permit for a use/user within the proposed Project’s buildings, and to the</p>	<p>As set forth by Ordinance No. 651.1</p> <p>Project Applicant/OSHA</p> <p>As set forth by Title 22, Division 4.5 of the California Code of Regulations</p> <p>As set forth by Title 22, Division 4.5, Chapter 11 of the California Code of Regulations</p> <p>Project Applicant, Project</p>	<p>As set forth by Ordinance No. 651.1</p> <p>During construction activities and long-term operations</p> <p>As set forth by Title 22, Division 4.5 of the California Code of Regulations</p> <p>As set forth by Title 22, Division 4.5, Chapter 11 of the California Code of Regulations</p> <p>Prior to issuance of building permits</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>(refer to CRDR 4.9-5). With mandatory compliance with regulatory requirements, impacts would be less than significant.</p> <p>Threshold e: Based on the results of the Project’s Phase I ESA (<i>Technical Appendix G</i>), the Project site is not located on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Accordingly, no impact would occur.</p> <p>Thresholds f, g, and h: The Project site is not located within two miles of a public airport or within an airport land use plan, and there are no components of the proposed Project that would affect airport operations. The Project site also is outside of the Airport Influence Area (AIA) for the Corona Municipal Airport. Therefore, the Project would not result in an inconsistency an Airport Master Plan, would not require review by the Airport Land Use Commission, and would not result in a safety hazard for people residing or working in the Project area. As such, no impact would occur.</p> <p>Threshold i: There are no private airstrips in the Project vicinity. Due to the distance between the Project site and the Skylark Airport, as well as the limited operations that occur at the Skylark Airport, the Project would not result in a safety hazard for people residing or working in the Project area associated with private airstrips or heliports. Accordingly, no impact would occur.</p>	<p>No Impact</p> <p>No Impact</p> <p>No Impact</p>	<p>extent hazardous materials are planned to exist on-site and a Hazardous Materials Business Emergency Plan (HMBEP) is required by law, the Project Applicant shall provide a copy of its approved Emergency Response Plan to the Superintendent’s Office and Facilities Office of the Lake Elsinore Unified School District outlining how the building user(s) will prevent or respond to spills or leaks of hazardous materials related to its facility/facilities and use of the Project site. If so requested, the Project Applicant shall also meet with School District and Fire Department officials to discuss emergency response procedures as contained in the HMBEP for spills or leaks at the Project site in relation to the nearby school facilities. This measure shall be implemented under the supervision of the Riverside County Planning Department, with input from the Lake Elsinore Unified School District Superintendent as appropriate. All meetings shall be documented and documentation shall be provided to the County Planning Department within 30 days of each meeting. Failure to abide by these procedures may be grounds for revocation of any plot plans or other discretionary approvals for specific warehouse uses on the Project site.</p>	<p>Hazardous Materials Consultant/ Planning Department</p>	<p>for Tenant Improvements and prior to final building inspection for Tenant Improvements</p>
4.10 Hydrology and Water Quality				
<p>Thresholds a., b., and i: The Project would be served potable water by the EVMWD, and does not propose any groundwater wells on site; thus, Project direct impacts to groundwater supplies would be less than significant.</p>	<p>Less Than Significant</p>	<p>CRDR 4.10-1 The Project Applicant is required to comply with the provisions of the Project’s NPDES permit, and the Project’s SWPPP. Compliance with the NPDES permit and the SWPPP would identify and implement an effective combination of erosion</p>	<p>Project Applicant/ Building and Safety</p>	<p>During construction activities</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>Additionally, the total amount of runoff from the site would not change with Project development, and as such Project-related runoff would be conveyed to downstream facilities where groundwater recharge would continue to occur. Additionally, water quality impacts during construction, including potential impacts due to a conflict with the Basin Plan and the EBGMP, would be less than significant. In addition, with implementation of the proposed Project, all runoff generated on site would be appropriately treated by the Project's BMPs prior to ultimate discharge into the Temescal Wash, the Project would not adversely affect surface or groundwater quality. As such, impacts would be less than significant.</p> <p>Thresholds c and f: Grading proposed as part of the Project generally would maintain the site's existing drainage patterns, with runoff continuing to flow in a generally northeasterly direction towards the Temescal Wash, either directly or via existing culverts beneath I-15. In addition, the proposed extended detention basins would reduce the total peak flows from the Project site from 657.62 cfs under existing conditions to 462.76 cfs under post-development conditions. As such, implementation of the proposed Project would not result in an increase in peak runoff from the Project site and therefore would not result in the alteration of the existing alignment of the Temescal Wash or any other downstream receiving waters. As such, impacts would be less than significant.</p> <p>Threshold d: With mandatory adherence to the SWPPP requirements, effects associated with construction-related erosion, siltation, water quality, and flooding on downstream water sources and flood control systems would be maintained at a level below significance. Large portions of the Project site would consist of impervious surfaces,</p>	<p>Less Than Significant</p> <p>Less Than Significant</p>	<p>control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate discharge to surface water from storm water and non-storm water discharges.</p>	<p>Department</p>	



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>with areas of pervious surfaces largely confined to landscaped areas. Thus, the potential for erosion hazards on site would be substantially decreased as compared to existing conditions with buildout of the Project site. As such, impacts would be less than significant.</p> <p>Threshold e: Future implementing developments on the Project site would implement stormwater drainage systems, which would include catch basins, underground storm drain lines, and extended detention basins. Additionally, the proposed extended detention basins would reduce the total peak flows from the Project site from 657.62 cfs under existing conditions to 462.76 cfs under post-development conditions. As such, impacts would be less than significant.</p> <p>Threshold g: According to FEMA FIRM No. 06065C2006G, the northeast corner of the Project site is mapped within a special flood hazard area subject to inundation by the 1% annual chance flood (Flood Zone “AE”), while the remaining portions of the Project site occur in areas that are not subject to inundation during the 1% annual chance flood. The portions of the Project site that are mapped within Flood Zone “AE” occur within Planning Area 6 of proposed SP 333A1, which is proposed for long-term conservation as natural open space. The Project would not involve any development or disturbances within areas mapped within Flood Zone “AE,” and all grading and development proposed as part of the Project would occur in areas that are not located within a flood plain. Accordingly, the Project would not impede or redirect flood flows, and no impact would occur. As such, no impact would occur.</p> <p>Threshold h: The Project site is located approximately 24 miles northeast of the Pacific Ocean, and as such there is no</p>	<p>Less Than Significant</p> <p>No Impact</p> <p>No Impact</p>			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
potential for the Project site to be inundated with tsunamis. Additionally, the Project site is not located within the dam inundation area for any bodies of water, including the Railroad Canyon Dam located in the City of Canyon Lake. As such, no impact would occur.				
4.11 Land Use and Planning				
<p>Threshold a: The Project would not conflict with the General Plan, EAP, the SCAG 2020-2045 RTP/SCS, or any other land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Additionally, there are no impacts due to land use incompatibility that have not already been evaluated and mitigated to the maximum feasible extent in relevant sections of this EIR; therefore, Project impacts due to land use incompatibility would be less than significant.</p> <p>Threshold b: The Project would not disrupt or divide the physical arrangement of an established community (including a low-income or minority community), and impacts would be less than significant.</p>	<p>Less Than Significant</p> <p>Less Than Significant</p>			
4.12 Mineral Resources				
<p>Threshold a: The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, with implementation of the proposed Project there would be no impact to known mineral resources.</p> <p>Threshold b: The Project would not 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, and no impact would occur.</p> <p>Threshold c: The Project would not be an incompatible land use located adjacent to a State classified or designated</p>	<p>No Impact</p> <p>No Impact</p> <p>No Impact</p>	No impacts would occur; thus, mitigation measures are not required.	N/A	N/A



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>Canyon Road to ensure that nearby sensitive receptors are not exposed to construction-related noise levels exceeding 85 dBA Leq. With implementation of the required mitigation, construction-related noise levels affecting nearby sensitive receptors would be reduced to 57.2 dBA (92.2 dBA - 35 dBA = 57.2 dBA), thus impacts would be less than significant. Additionally, implementation of Mitigation Measure MM 4.13-3 would ensure that site-specific noise impact analyses are prepared in conjunction with future implementing developments (i.e., plot plans, conditional use permits, etc.) for light industrial and business park uses within SP 333A1 Planning Areas 1 and 2. As such, impacts would be less than significant.</p> <p>Threshold d: Project-related construction activities onsite would not expose nearby sensitive receptors to vibration levels exceeding 0.01 inch per second RMS on either a direct or cumulatively-considerable basis. Likewise, under long-term operational conditions, the Project would not expose nearby sensitive receptors to vibration levels exceeding 0.006 PPV. However, during the construction of the offsite water line, the Project would expose the nearest sensitive receptor to vibration levels up to 0.147 inch per second RMS, which would exceed the identified threshold of significance of 0.01 inch per second RMS. Implementation of Mitigation Measure MM 4.13-2 would prohibit drilling equipment, large bulldozers, and loaded heavy duty trucks from operating within 25 feet of any existing structure during the construction of the proposed offsite water main within Horsethief Canyon Road. Implementation of the required mitigation would reduce Project vibration-related impacts along this roadway segment to below the County’s threshold of 0.01 inches/second RMS, and would reduce Project impacts to less-than-significant levels.</p>	<p>Less Than Significant with Mitigation Incorporated</p>	<p><i>factors as winds, shear, shallow soil failure, earthquakes, and erosion.”</i></p> <p>The Project construction contractor shall be responsible for enforcing this requirement, which also shall be specified in bid documents issued to prospective construction contractors. The Project construction contractor shall permit inspections by Riverside County to verify compliance with this measure.</p> <p>MM 4.13-2 Prior to issuance of grading permits or improvement plans for the construction of the off-site water main within the existing alignment of Horsethief Canyon Road, the Riverside County Building and Safety Department shall review the improvement plans to ensure that a note is included prohibiting the use of drilling equipment, large bulldozers, or loaded heavy duty trucks within 25 feet of any existing structure. The Project construction contractor shall be responsible for enforcing this requirement, which also shall be specified in bid documents issued to prospective construction contractors. The Project construction contractor shall permit inspections by Riverside County to verify compliance with this measure.</p> <p>MM 4.13-3 Prior to approval of future implementing development applications (i.e., plot plans, conditional use permits, etc.) for proposed light industrial or business park uses within Planning Areas 1 or 2 of Specific Plan No. 333, Amendment No. 1, the Project Applicant shall prepare and Riverside County shall review and approve a site-specific noise impact analysis. The analysis shall evaluate the proposed application materials to determine whether future operations on-site would expose nearby sensitive receptors (i.e., residential uses) to noise levels exceeding the County’s residential standard of 55 dBA Leq during daytime hours (i.e., between 7:00 a.m. and 10:00 p.m.) and 45 dBA Leq during nighttime hours (i.e., between 10:00 p.m. and 7:00 a.m.). If significant operational-related noise impacts are anticipated, the</p>	<p>Project Applicant, Construction Contractors/ Planning Department</p> <p>Project Applicant, Construction Contractors/ Planning Department</p>	<p>Prior to the issuance of grading permits and during grading and ground-disturbing activities</p> <p>Prior to approval of any future implementing developments on site (i.e., tentative tract maps, plot plans, etc.) and during construction activities</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
		<p>County shall ensure that the noise impact analysis identifies and that the implementing developments incorporate any noise attenuation measures that may be necessary to reduce operational-related noise impacts affecting off-site residential uses to below the County’s residential standard during both daytime and nighttime hours (i.e., 55 dBA Leq and 45 dBA Leq, respectively). Noise attenuation measures may include, but are not necessarily limited to, the incorporation of screen walls or other barriers (such as berms). Prior to issuance of building permits, the Riverside County Building and Safety Department shall ensure that any required noise attenuation measures have been incorporated into the plans, and shall verify that the noise attenuation measures have been implemented prior to final building inspection.</p>		
<p>4.14 Paleontological Resources</p>				
<p>Threshold a: The Project would not impact any known paleontological resources or unique geological features. However, the Project site is underlain by soils and geologic units with a “High” potential for containing unique paleontological resources. Implementation of Mitigation Measure MM 4.14-1 would ensure that the Project’s PRIMP is implemented as part of future site grading activities. Implementation of the Project’s PRIMP would ensure that paleontological resources, if uncovered during site grading activities, are appropriately treated, and would reduce the Project’s direct and cumulatively-considerable impacts to paleontological resources to less-than-significant levels.</p>	<p>Less Than Significant with Mitigation Incorporated</p>	<p>MM 4.14-1 Prior to the issuance of grading permits, the County shall condition proposed grading permits to require implementation of the Project’s Paleontological Resource Impact Monitoring Program (PRIMP), which is included as Technical Appendix K to the Project’s EIR. As required by the PRIMP, all mass grading, excavation, drilling, and trenching activities within the very old alluvial fan deposits (“Qvof”), which underlie the majority of the Project site, starting at the surface, are to be monitored full-time for paleontological resources. For earth moving within young alluvial fan deposits (“Qyfa”) and young sandy wash deposits (“Qywa”) mapped at the Project site (i.e., areas considered to have a “Low” potential for containing paleontological resources), periodic “spot check” monitoring shall be performed, consisting of approximately one to three scheduled site visits per week by a paleontological monitor during construction ground disturbance. If fossils are discovered within the young alluvial fan deposits, full-time monitoring for paleontological resources shall be required. Refer to the Project’s PRIMP for a description of additional requirements, including those related to the mandatory pre-construction meeting; salvaging</p>	<p>Project Applicant, Project Paleontologist/ County Geologist, Planning Department</p>	<p>Prior to the issuance of grading permits and during grading and ground-disturbing activities</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
		fossils that have been unearthed; sampling of sediments likely to contain the remains of small fossil invertebrates and vertebrates; collecting and processing samples and specimens; identification and curation of fossils; and procedures for reporting findings.		
4.15 Population and Housing				
<p>Threshold a: The Project site does not contain any existing residences or housing, and the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Thus, no impact will occur.</p>	No Impact	Impacts would be less than significant; thus, mitigation measures are not required.	N/A	N/A
<p>Threshold b: The employment-generating land uses proposed as part of the Project (i.e., light industrial and business park land uses) would replace the site's existing residential land use designations, and would result in approximately 2,436 jobs at full buildout. However, it is anticipated that any future employees generated by the Project could be accommodated by existing residential communities and/or by future residential uses to be constructed in accordance with the General Plan Land Use Plan, and that no additional housing, including housing affordable to households earning 80% or less of the County's median income, would be required to accommodate Project-related employees. Impacts would be less than significant.</p>	Less Than Significant			
<p>Threshold c: Because the Project site is designated for development with urban uses by the General Plan, EAP, and SP 333, and because the Project would accommodate employment opportunities in a portion of Riverside County that has a relatively low ratio of jobs to housing, the Project would not directly induce substantial unplanned population growth in the area, and impacts would be less than significant. The Project also would not indirectly induce</p>	Less Than Significant			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
substantial unplanned population growth due to infrastructure improvements, as all proposed infrastructure improvements would be sized to serve only the proposed Project; thus, indirect population growth impacts would be less than significant.				
4.16 Public Services				
<p>Threshold a: Although the Project would contribute to a need for new or expanded fire protection facilities, it is not possible to identify environmental impacts that may be associated with such new or expanded fire protection facilities until a specific proposal and design for such facilities are prepared by the RCFD. Environmental effects of such fire protection facilities and associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded fire protection facilities. Additionally, with payment of mandatory DIF fees, the proposed Project’s potential direct and cumulatively-considerable impacts to the Riverside County Fire Department would be reduced to less-than-significant levels.</p> <p>Threshold b: With payment of mandatory DIF fees, the proposed Project’s potential direct and cumulatively-considerable impacts to the Riverside County Sheriff’s Department would be reduced to less-than-significant levels, and the Project would not result in or require the construction of new police protection facilities that could result in a significant impact to the environment. As such, impacts would be less than significant.</p> <p>Threshold c: The Project would not directly generate a resident population, and thus would not directly impact school services in the local area. Although the Project may indirectly result in new residents within the service area of</p>	<p>Less Than Significant</p> <p>Less Than Significant</p> <p>Less Than Significant</p>	<p>CRDR 4.16-1 As a condition of Project approval, the proposed Project would be required to conform to all mandatory local, State, and federal laws, ordinances, and standards relating to fire safety. Among other items, these requirements include conformance with the Uniform Building Code Section 1503, which requires that all buildings be constructed with fire retardant roofing material. Access routes in the Project area would be required to be maintained throughout construction and buildout of the proposed Project.</p> <p>CRDR 4.16-2 The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a development impact fee (DIF) to assist the County in providing for fire protection facilities, including fire stations. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and fire station construction.</p> <p>CRDR 4.16-3 The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a development impact fee (DIF) to assist the County in providing for sheriff protection facilities, including sheriff stations. Payment of the DIF fee would ensure that funds are available for additional sheriff personnel as well as capital improvements, such as land/equipment purchases and sheriff station construction.</p> <p>CRDR 4.16-4 The Project is required to comply with Riverside County Ordinance No. 575, which requires mandatory payment of</p>	<p>As set forth in applicable local, State, and federal laws, ordinance, and standards related to fire safety</p> <p>As set forth by Ordinance No. 659</p> <p>As set forth by Ordinance No. 659</p> <p>As set forth by Ordinance No.</p>	<p>As set forth in applicable local, State, and federal laws, ordinance, and standards related to fire safety</p> <p>As set forth by Ordinance No. 659</p> <p>As set forth by Ordinance No. 659</p> <p>As set forth by Ordinance No. 575</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>the LEUSD, and thus may indirectly result in an incremental increase in demand for new school facilities, there are no current publicly-available plans detailing where such facilities would be built. Environmental effects of such school facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded school facilities. Any mitigation measures required for new or expanded school facilities could be funded, in part, from property taxes and/or through payment of school impact fees. Furthermore, the payment of mandatory school impact fees would ensure that the Project would result in less-than-significant direct or cumulatively-considerable impacts to the ability of the LEUSD to provide for school services.</p> <p>Threshold d: The Project would not directly generate a resident population, and thus would not directly impact library services in the local area. Although the Project may indirectly result in new residents within the local area, and thus could result in an incremental increase in demand for increased library facilities, it is not possible to identify environmental impacts that may be associated with such new or expanded library facilities until a specific proposal and design for such facilities are prepared by Riverside County. However, the Project would be required to contribute DIF fees, which would be used in part to provide for library space and/or new book volumes. Accordingly, with payment of DIF fees, Project impacts to library services and facilities are evaluated as less than significant on both a direct and cumulatively-considerable basis.</p> <p>Threshold e: With payment of mandatory DIF fees, the Project would result in less-than-significant direct and cumulatively-considerable impacts to health services facilities, and the Project would not result in or require the</p>	<p>Less Than Significant</p> <p>Less Than Significant</p>	<p>school impact fees pursuant to Public Education Code § 17072.10-18.</p> <p>CRDR 4.16-5 The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a development impact fee (DIF) to assist the County in providing for library facilities. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and library construction or expansion.</p> <p>CRDR 4.16-6 The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a development impact fee (DIF) to assist the County in providing for health facilities. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and health facility construction.</p>	<p>575</p> <p>As set forth by Ordinance No. 659</p> <p>As set forth by Ordinance No. 659</p>	<p>As set forth by Ordinance No. 659</p> <p>As set forth by Ordinance No. 659</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>construction of new health services facilities that could result in a significant impact to the environment. As such, impacts would be less than significant.</p>				
<p>4.17 Recreation</p>				
<p>Thresholds a and d: The physical construction of the on-site trails and pedestrian facilities has been addressed under the relevant issue areas identified throughout the EIR prepared for the Project (e.g., air quality, biological resources, cultural resources). Under each of these topics, the Project impacts are determined to be less than significant, or mitigation measures have been identified to reduce impacts to the maximum feasible extent. Accordingly, Project impacts due to parkland development on site would be less than significant, requiring no mitigation beyond that which is identified in other portions of the EIR.</p> <p>Threshold b: The Project does not include any residential uses or other land use that may generate a population that would directly increase the use of existing neighborhood and regional parks or other recreational facilities. Accordingly, implementation of the proposed Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, and impacts would be less than significant.</p> <p>Threshold c: The Project site is not located within a CSA that was established for recreational facilities, the Project site is not located within a Community Parks and Recreation Plan, and the Project is not subject to payment of in-lieu fees (Quimby fees) for recreational facilities pursuant to Section 10.35 of Riverside County Ordinance No. 460. Accordingly, impacts due to a conflict with a Community Parks and Recreation Plan and due to the need</p>	<p>Less Than Significant</p> <p>Less Than Significant</p> <p>Less Than Significant</p>	<p>Impacts would be less than significant; thus, mitigation measures are not required.</p>	<p>N/A</p>	<p>N/A</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>Project-generated VMT cannot be reduced to a level of less than significant.</p> <p>Threshold c: Improvements planned as part of the Project would be constructed to County standards, and would not increase hazards due to a geometric design feature. Additionally, traffic associated with the Project’s light industrial and business park land uses would be routed directly to the I-15 on and off ramps at Indian Truck Trail and Lake Street via Horsethief Canyon Road and Temescal Canyon Road, and would be directed away from residential streets. As such, impacts would be less than significant.</p> <p>Threshold d: There are no components of the proposed Project that would result in or require a substantial increase in expenditures by Riverside County for public road maintenance such that environmental impacts would result. As such, Project impacts would be less than significant.</p> <p>Threshold e: Aside from proposed improvements at the intersection of Street A and Horsethief Canyon Road, as well as improvements to Street A and other roadways internal to the Project site, the Project would not involve any major improvements to Study Area roadways. There are no other Project-related improvements that would have the potential to adversely affect circulation during Project-related construction activities. Accordingly, impacts would be less than significant.</p> <p>Threshold f: The Project proposes a network of internal roadways and drive aisles within the Project site that would be constructed to County standards. During the County’s review of the proposed Project, the County reviewed the proposed design plans to ensure that adequate emergency access would be available at the site and that the Project</p>	<p>Less Than Significant</p> <p>Less Than Significant</p> <p>Less Than Significant</p> <p>Less Than Significant</p>	<p>program is to encourage 2+ person occupancy vehicle trips and encourage other alternative modes of transportation. Carpooling opportunities and public transportation information shall be advertised to employees of the building tenant. Developer and all successors shall include the provisions of this obligation in all leases of the Project so that all tenants shall fulfill the terms and conditions of this mitigation measure. The developer and all successors shall maintain records demonstrating compliance with these requirements, which shall be made available to Riverside County staff upon request.</p> <p>CRDR 4.18-1 Prior to issuance of building permits, the Project Applicant shall pay appropriate Development Impact Fee Program (DIF) fees at the rates then in effect in accordance with Riverside County Ordinance No. 659.</p> <p>CRDR 4.18-2 Prior to final building inspection, the Project Applicant shall pay appropriate Western Riverside County Transportation Uniform Mitigation Fee Program Ordinance (TUMF) fees at the rates then in effect in accordance with Riverside County Ordinance No. 824.</p> <p>CRDR 4.18-3 Prior to approval of any implementing developments (i.e., tentative tract maps, plot plans, conditional use permits, etc.), the Project Applicant or implementing developer shall prepare a Traffic Analysis (TA) in compliance with the most recent version of the Riverside County Transportation Department’s “Transportation Analysis Guidelines.” Appropriate conditions of approval shall be imposed on future implementing developments based on the results of the future-required TIA(s) to address projected Level of Service (LOS) deficiencies along the transportation network. Anticipated Project-related responsibilities for improvements, fee payments, and fair-share contributions are summarized in Table 4.18-24, Project Transportation Improvements, Fee Payments, and Fair-Share</p>	<p>Occupants/ Planning Department</p> <p>Project Applicant/ Planning Department</p> <p>Project Applicant/ Planning Department</p> <p>Project Applicant, Project Traffic Engineer/ Transportation</p>	<p>Prior to issuance of building permits</p> <p>Prior to final building inspection</p> <p>Prior to approval of any implementing developments</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>would not adversely affect access to any nearby uses. Accordingly, impacts would be less than significant.</p> <p>Threshold g: The Project would entail the construction of Street A on site, which would include a community trail along one side of the roadway. However, impacts associated with the construction of these on-site trails is inherent to the Project’s construction phase, and such impacts have been evaluated throughout this EIR. Additionally, there are no impacts associated with the construction of bike systems or bike lanes that have not already been addressed herein. As such, impacts would be less than significant.</p>	<p>Less Than Significant</p>	<p>Contributions, of the Project’s EIR. The actual improvements, fee payments, and fair-share contributions shall be based on the results of the TA(s) required for each implementing development, and may vary from the list of improvements, fee payments, and/or fair-share contributions listed in Table 4.18-24.</p>		
4.19 Tribal Cultural Resources				
<p>Threshold a: Significant Direct and Cumulatively-Considerable Impact. The Project has the potential to result in significant impacts to previously-undiscovered Tribal Cultural Resources, and could result in significant impacts to previously-identified Tribal Cultural Resources within the Project site in the absence of protective measures. Implementation of EIR Mitigation Measures MM 4.5-1 through MM 4.5-8 would ensure appropriate treatment of any Tribal Cultural Resources that may be identified during Project-related ground-disturbing activities, including human remains. Implementation of the required mitigation would reduce Project impacts to Tribal Cultural Resources to below a level of significance.</p>	<p>Less than Significant</p>	<p>Mitigation Measures MM 4.5-1 through MM 4.5-8 shall apply. The mitigation measures included in EIR Subsection 4.5 have been drafted to include all of the mitigation requirements requested during the Project’s Tribal Consultation process. No additional mitigation measures are required.</p>	<p>As specified above for Mitigation Measures MM 4.5-1 through MM 4.5-8</p>	<p>As specified above for Mitigation Measures MM 4.5-1 through MM 4.5-8</p>
4.20 Utilities and Service Systems				
<p>Threshold a: Although the Project would require construction of new or expanded water, wastewater conveyance, and storm water drainage systems, impacts associated with the construction of such facilities have been evaluated throughout the Project’s EIR under the appropriate subject headings (e.g., air quality, biological</p>	<p>Less Than Significant</p>	<p>CRDR 4.20-1 The Project is required to comply with the provisions of the California Solid Waste Integrated Waste Management Act, (AB 939, 1989) which mandates a reduction of disposed waste throughout California.</p> <p>CRDR 4.20-2 The Project is required to comply with the</p>	<p>As set forth by AB 939</p> <p>As set forth by</p>	<p>As set forth by AB 939</p> <p>As set forth by AB</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. Accordingly, the Project would not result in or require the expansion of the existing facilities at the Horsethief Canyon WRF, and impacts would therefore be less than significant.</p> <p>Threshold b: The UWMP demonstrates that the EVMWD would have sufficient water supplies even during single and multiple dry years to meet the projected demand within its district through year 2040. Because the Project's anticipated water demand would be within the demand projections identified by the UWMP, it can be concluded that the EVMWD would have sufficient water supplies to serve the Project based on existing entitlements and resources. Additionally, the Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities. Therefore, impacts associated with the Project's water demand would be less than significant.</p> <p>Threshold c: Impacts associated with the Project's proposed sewer improvements are inherent to the Project's construction phase, and impacts have been evaluated throughout the Project's EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. As such, with the mitigation measures specified in this EIR, Project impacts due to proposed sewer improvements would be less than significant.</p> <p>Threshold d: With implementation of the Project, and</p>	<p>Less Than Significant</p> <p>Less Than Significant</p> <p>Less Than</p>	<p>provisions of the California Solid Waste Reuse and Recycling Act (AB 1327) which developed a model ordinance for adoption of recyclable materials in development projects. This Act requires all development projects that are commercial, industrial, institutional, or marina in nature and where solid waste is collected and loaded, to provide an adequate area for collecting and loading recyclable materials over the lifetime of the project. The area is required to be provided before building permits are issued.</p> <p>CRDR 4.20-3 The Project is required to comply with the provisions of the Mandatory Commercial Recycling Program (AB 341). AB 341 made a legislative declaration that it is the policy goal of the State that not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020, and required the Department of Resources Recycling and Recovery, by January 1, 2014, to provide a report to the Legislature that provides strategies to achieve that policy goal and also includes other specified information and recommendations.</p> <p>CRDR 4.20-4 The Project would be subject to the following applicable standard conditions of approval imposed on the Project by the RCDWR:</p> <ul style="list-style-type: none"> • Prior to issuance of a building permit, a Waste Recycling Plan (WRP) shall be submitted to the Riverside County Department of Waste Resources for approval. At a minimum, the WRP must identify the materials (i.e., cardboard, concrete, asphalt, wood, etc.) that will be generated by construction and development, the projected amounts; the measures/methods that will be taken to recycle, reuse, and/or reduce the amount of materials; the facilities and/or haulers that will be utilized; and the targeted recycling or reduction rate. During Project construction, the Project site shall have, 	<p>AB 1327</p> <p>As set forth by AB 341</p> <p>Project Applicant/ RCDWR</p>	<p>1327</p> <p>As set forth by AB 341</p> <p>Prior to issuance of a building permit, prior to final building inspection, and during the life of the proposed Project</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>based on the maximum daily flows, the Horsethief Canyon WRF would receive up to 0.72 MGD requiring treatment (0.55 MGD maximum daily flows under existing conditions plus 0.17 MGD from the Project). Upon completion of the planned upgrades to the Horsethief Canyon WRF, the Horsethief Canyon WRF would have adequate capacity to treat wastewater generated by the Project and other existing and planned developments. As such, Project impacts due to wastewater capacity would be less than significant.</p> <p>Threshold e: Regional solid waste facilities would have adequate capacity to handle solid waste generated by the Project’s construction and operational phases. The Project would not 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. Accordingly, impacts would be less than significant.</p> <p>Threshold f: With mandatory compliance to AB 939, AB 341, and RCDWR’s programs and policies, the Project would not result in a significant impact due to noncompliance with regulations related to solid waste. As such, a less-than-significant impact would occur.</p> <p>Threshold g: Impacts associated with the construction or expansion of utility facilities would be less than significant or otherwise mitigated to the maximum feasible extent by the Project’s EIR. No additional mitigation would be required.</p>	<p>Significant</p> <p>Less Than Significant</p> <p>Less Than Significant</p> <p>Less Than Significant</p>	<p>at a minimum, two (2) bins: one for waste disposal and the other for the recycling of Construction and Demolition (C&D) materials. Additional bins are encouraged to be used for further source separation of C&D recyclable materials. Accurate record keeping (receipts) for recycling of C&D recyclable materials and solid waste disposal must be kept. Arrangements can be made through the franchise hauler.</p> <ul style="list-style-type: none"> • Prior to final building inspection, evidence (i.e., receipts or other type of verification) to demonstrate Project compliance with the approved WRP shall be presented by the Project proponent to the Planning Division of the Riverside County Department of Waste Resources in order to clear the Project for occupancy permits. Receipts must clearly identify the amount of waste disposed and Construction and Demolition (C&D) materials recycled. • Hazardous materials are not accepted at Riverside County landfills. In compliance with federal, state, and local regulations and ordinances, any hazardous waste generated in association with the Project shall be disposed of at a permitted Hazardous Waste disposal facility. Hazardous waste materials include, but are not limited to, paint, batteries, oil, asbestos, and solvents. 		
4.21 Wildfire				
<p>Threshold a: The Project site and surrounding areas are not identified as evacuation routes, and there are no adopted emergency response plans or emergency evacuation plans</p>	<p>Less Than Significant</p>	<p>CRDR 4.21-1 Future implementing developments within the Project site (e.g., plot plans, building permits, etc.) shall be reviewed by Riverside County for compliance with the fire</p>	<p>Project Applicant/ Building and</p>	<p>Prior to approval of future implementing</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>applicable to the Project area. During construction and at Project build-out, the proposed Project would be required to maintain adequate access for emergency vehicles. Accordingly, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and impacts would be less than significant.</p> <p>Threshold b and e: The Project would be subject to the fire abatement requirements specified by SP 333A1, which includes requirements for the provision of a 100-foot wide FMZ around all buildings, and specifies additional fire protection measures for buildings where the 100-foot wide FMZ cannot be achieved. With mandatory compliance with the fire abatement requirements of SP 333A1, the Project would not exacerbate wildfire risks, and would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Additionally, the Project would not expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. As such, impacts would be less than significant.</p> <p>Threshold c: Impacts to areas requiring FMZs have been evaluated throughout the Project’s EIR under the appropriate subject heading (e.g., biological resources, cultural resources, etc.), and where impacts are identified mitigation measures are identified to reduce impacts to the extent feasible. As such, impacts would be less than significant.</p> <p>Threshold d: Although during extreme fire conditions there still would remain a potential for wildland fires to affect future buildings on site, implementation of the required enhanced construction features provided by the applicable</p>	<p>Less Than Significant</p> <p>Less Than Significant</p> <p>Less Than Significant</p>	<p>protection measures included in Section 2.9, <i>Fire Protection Plan</i>, of SP 333A1.</p>	<p>Safety Department, Planning Department, Riverside County Fire Department</p>	<p>developments (e.g., plot plans, building permits, etc.)</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
codes and the fuel modification requirements required by SP 333A1 would reduce the site's vulnerability to wildfire to less-than-significant levels. Therefore, the Project would not 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, and impacts would be less than significant.				



1.0 INTRODUCTION

1.1 PURPOSES OF CEQA AND LEGAL AUTHORITY FOR THIS PROGRAM EIR

This Program Environmental Impact Report (EIR) has been prepared in compliance with the California Environmental Quality Act (Public Resources Code § 2100 et. seq. (“CEQA”), as amended, and the CEQA State Guidelines (Title 14 California Code of Regulations § 15000 et. seq.) (“CEQA Guidelines”), as amended. As stated by State CEQA Guidelines § 15002(a), the basic purposes of CEQA are to:

- Inform governmental decision makers and the public about the potential, significant environmental effects of proposed government actions (including the discretionary approval of land entitlement applications submitted by private parties);
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if a project will be approved involving significant environmental effects.

The public agency with the principal responsibility for carrying out or approving a project or the first public agency to make a discretionary decision to proceed with a proposed project should ordinarily act as the “Lead Agency” pursuant to State CEQA Guidelines §§ 15050-15051. The County of Riverside is the Lead Agency for the proposed Project evaluated in this Program EIR.

Under CEQA, if a Lead Agency determines that there is substantial evidence in light of the whole record that a project may have a significant effect on the environment, the agency must prepare an Environmental Impact Report (EIR) (State CEQA Guidelines § 15064(a)(1)). The purpose of an EIR is to inform public agency decision-makers and the public of the potentially significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project (State CEQA Guidelines § 15121(a)).

This Program EIR is an informational document that represents the independent judgment of the County of Riverside (as the Lead Agency) for use by the Riverside County decision-makers, responsible and trustee agencies, and members of the general public to evaluate the physical environmental effects that could result from constructing and operating the proposed Project. The County of Riverside has reviewed and, as necessary, directed revisions to all submitted drafts, technical studies, and reports supporting this Program EIR for consistency with County policies and requirements to ensure that this Program EIR reflects its own independent judgment. Governmental approvals requested from the County of Riverside by the Project Applicant include:

1. Adoption by resolution of General Plan Amendment No. 200004 (GPA200004);



2. Adoption by resolution of Amendment No. 1 to Specific Plan No. 333 (SP00333A01); and
3. Adoption by ordinance of Change of Zone No. 2000016 (CZ2000016).

Other related discretionary and administrative actions that are required to construct and operate the Project described in this Program EIR are listed in Section 3.0, *Project Description*. This document complies with all criteria, standards, and procedures of CEQA §§ 21000 *et seq.* and State CEQA Guidelines §§ 15000 *et seq.*

As a first step in the CEQA compliance process, Riverside County determined that implementation of the Project has the potential to result in significant environmental effects and directed preparation of this Program EIR. Because the Project would require future discretionary approvals (e.g., tentative tract maps, plot plans, etc.), this EIR has been prepared as a Program EIR pursuant to State CEQA Guidelines § 15168. As defined by State CEQA Guidelines § 15168(a), a Program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: 1) geographically; 2) as logical parts in the chain of contemplated actions; 3) in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or 4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways. For purposes of discussion herein, the terms “EIR” and “Program EIR” are used interchangeably.

This Program EIR represents the independent judgment of Riverside County (as the Lead Agency) and evaluates the physical environmental effects that could result from constructing and operating the proposed Project. Acting as Lead Agency, the County of Riverside will consider the following issues regarding the proposed Project: a) evaluation of this Program EIR to determine if the physical environmental impacts are adequately disclosed; b) assessment of the adequacy and feasibility of identified mitigation measures and the potential addition, modification to, or deletion of mitigation measures, standard conditions of approval, or Project design features; c) consideration of alternatives to the Project that would reduce or eliminate significant environmental effects of the Project; and, if necessary, d) consideration of Project benefits that override the Project’s unavoidable and unmitigable significant effects on the environment.

Accordingly, and in conformance with State CEQA Guidelines § 15121(a), the purposes of this EIR are to: (1) disclose information by informing public agency decision makers and the public generally of the significant environmental effects associated with all phases of the Project, (2) identify possible ways to minimize or avoid those significant effects, and (3) to describe a reasonable range of alternatives to the Project that would feasibly attain most of the basic Project objectives but would avoid or substantially lessen its significant environmental effects.

Before taking action to approve the Project, the County of Riverside (serving as the Lead Agency) has the obligation to: (1) ensure this Program EIR has been completed in accordance with CEQA; (2) review and consider the information contained in this Program EIR as part of its decision-making process; (3) make a statement that this Program EIR reflects Riverside County’s independent judgment; (4) ensure that all significant effects on the environment are avoided or substantially lessened where feasible; and, if necessary (5) make written findings for each unavoidable significant environmental effect stating the reasons why



mitigation measures or project alternatives identified in this Program EIR are infeasible and citing the specific benefits of the proposed Project that outweigh its unavoidable adverse effects (State CEQA Guidelines §§ 15090-15093).

The roles and responsibilities of the County of Riverside Planning Commission and Board of Supervisors for Project-related approvals are as follows.

- **The Planning Commission:** The Planning Commission will recommend to the Board of Supervisors whether the Project’s applications, which include GPA200004, SP00333A01, and CZ2000016, should be approved, modified, or denied, and will recommend to the Board of Supervisors whether to certify the Final Program EIR (FPEIR) with or without modifications.
- **Board of Supervisors:** The Board of Supervisors will decide whether to approve, modify, or deny GPA200004, SP00333A01, and CZ2000016. Project-related approvals will be subject to noticed, public hearings held before the Board of Supervisors, which will include the information contained in the Program EIR, and the associated administrative record. Upon approval or conditional approval of the Project and certification of this Program EIR by the Board of Supervisors, the County would conduct administrative level reviews and grant the permits and approvals needed to implement the Project.

This Program EIR and all supporting technical appendices are available for review at the County of Riverside Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501 during the County’s regular business hours, or can be requested in electronic form by contacting the County Planning Department.

1.2 SUMMARY OF THE PROJECT EVALUATED BY THIS PROGRAM EIR

The County of Riverside is the Lead Agency for the proposed Project, under whose authority this Program EIR has been prepared. For purposes of this Program EIR, the term “Project” refers to the Project’s discretionary applications for the first amendment to the Renaissance Ranch Specific Plan No. 333 (SP00333A01), a General Plan Amendment (GPA200004), and Change of Zone (CZ2000016); future implementing discretionary actions required to implement the Project (e.g., tentative tract maps, plot plans, etc.); and all of the activities associated with Project implementation including planning, construction, and long-term operations.

The Project as evaluated herein consists of a proposal to amend the General Plan and specific plan land use designations and to change the site’s zoning classification to allow for the future development of the 157.1-acre Project site with 18.0 acres of “Business Park (BP)” uses, 97.2 acres of “Light Industrial (LI)”uses, “Open Space – Conservation (OS-C)” on 11.5 acres, “Open Space – Conservation Habitat (OS-CH)” on 27.1 acres, and major circulation facilities on 3.3 acres. Specifically, the Project Applicant is requesting the following governmental approvals from the County of Riverside to implement the Project (refer to Chapter 3.0, *Project Description*, for a complete description of the Project’s construction and operational characteristics):



- **General Plan Amendment No. 200004 (GPA200004)** is proposed to modify the approved land uses for the Project site in order to reflect changes proposed as part of proposed Amendment No. 1 to the Renaissance Ranch Specific Plan No. 333 (SP00333A01), which is discussed below. The adopted General Plan designates the Project site for “Medium Density Residential (MDR)” land uses. With approval of GPA200004, the Project site would be designated for “Business Park (BP)” land uses on 18.0 acres; “Light Industrial (LI)” land uses on 97.2 acres; “Open Space – Conservation (OS-C)” land uses on 11.5 acres; “Open Space – Conservation Habitat (OS-CH)” land uses on 27.1 acres; and major circulation facilities on 3.3 acres.
- **Amendment No. 1 to Specific Plan No. 333 (SP00333A01)** is proposed to modify the allowed land uses and planning area boundaries within the Renaissance Ranch Specific Plan (SP 333). Under existing conditions, SP 333 designates the 157.1-acre Project site for 355 “Medium Density Residential (MDR)” dwelling units, a 4.3-acre community park, 2.0 acres of pocket parks, and open space on 52.8 acres. SP00333A1 consists of a proposal to modify the approved land uses to instead include “Business Park (BP)” land uses on 18.0 acres; “Light Industrial (LI)” land uses on 97.2 acres; “Open Space – Conservation (OS-C)” land uses on 11.5 acres; “Open Space – Conservation Habitat (OS-CH)” land uses on 27.1 acres; and major circulation facilities on 3.3 acres. As proposed by SP00333A01, areas designated for “Light Industrial” and “Business Park” uses may be developed with a Floor Area Ratio (FAR) up to 0.50. Accordingly, approval of SP00333A01 would allow for the future development of up to 392,040 s.f. of “Business Park” building area and up to 2,117,016 s.f. of “Light Industrial” building area.
- **Change of Zone No. 2000016 (CZ 2000016)** is proposed to modify the Planning Area boundaries, permitted uses, and development standards throughout the 157.1-acre site in order to reflect the land uses proposed as part of SP00333A01, as described above.

1.3 CEQA PROCESS OVERVIEW

The California Environmental Quality Act (CEQA) (Public Resources Code, §§ 21000- 21177) requires that all public agencies within the State of California, having land use approval over project activities that have the potential to affect the quality of the environment, shall regulate such activities so that impacts to the environment can be prevented to the extent feasible. Such activity is reviewed and monitored through the CEQA process, as provided in the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, §§ 15000-15387). CEQA distinguishes varied levels of documentation and public review based on a project’s anticipated level of effect on the environment.

When it is determined through preliminary review that a project may likely have one or more significant effects upon the environment, then an Environmental Impact Report (“EIR”) must be prepared. The “scope” of the EIR may be determined through preparation of an Initial Study and a public scoping process. The EIR should consider both the potential project-specific (direct and indirect) and cumulative environmental impacts that could result from the implementation of the proposed project.



Pursuant to State CEQA Guidelines § 15121, the EIR is primarily an informational document intended to inform the public agency decision makers and the general public of the potentially significant effects of a proposed project. The EIR should disclose all known potentially significant impacts; identify feasible means to minimize or mitigate those effects; and consider a number of feasible alternatives to the project that might further reduce significant impacts while still attaining the project objectives. The decision-makers must consider the information in an EIR before taking action on the proposed project. The EIR may constitute substantial evidence in the record to support the agency’s action on the project.

The EIR is prepared by or under the direction of the Lead Agency, which for the proposed Project is the County of Riverside. The County of Riverside is the public agency that has the primary responsibility for approving or carrying out the Project. Further, responsible and trustee agencies, which are public agencies that have a level of discretionary approval over some component of the proposed Project, may rely upon the EIR prepared by the County of Riverside.

An EIR is prepared in two key stages. First, a Draft EIR is prepared and distributed for public and agency review. Once comments on the Draft EIR are received, responses to those comments and any additional relevant project information are prepared and compiled in a Final EIR. Both of these documents (i.e., the Draft EIR and the Final EIR), along with any related technical appendices, represent the complete record of the EIR. Throughout this document, the terms Final (Program) EIR or Draft (Program) EIR may be used interchangeable since both are part of the ultimate EIR record; however, “Draft EIR” or “Draft Program EIR” may be used specifically when referring to information provided in the volume made available for the CEQA-required 45-day public review period.

In accordance with State CEQA Guidelines § 15087, this Draft Program EIR will be made available for review by the public and public agencies for a minimum period of 45 days to provide comments “on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated” (State CEQA Guidelines § 152049(a)). Responses to written comments received during the public review period will be included in the Final Program EIR (FPEIR). During the decision-making process, the Project and its design features, objectives, merits, environmental consequences, and socioeconomic factors, among other information contained in the Project’s administrative record, will be considered by Riverside County decision-makers. If the FPEIR is certified and the Project approved, Riverside County and other public agencies with permitting authority over all, or portions, of the Project would be able to rely on the FPEIR as part of their permitting processes to evaluate the environmental effects of the Project as they pertain to the approval or denial of applicable permits.

1.4 PROGRAM EIR SCOPE, FORMAT, AND CONTENT

1.4.1 PROGRAM EIR SCOPE

Pursuant to the procedural requirements of CEQA, on March 11, 2021, the County filed a Notice of Preparation (NOP) with the California Office of Planning and Research (State Clearinghouse) and Riverside County Clerk to indicate that an EIR would be prepared to evaluate the Project’s potential to impact the environment. The NOP also was distributed to surrounding property owners, responsible and trustee agencies, and other



interested parties for a 30-day public review period that commenced on March 11, 2021 and concluded on April 10, 2021. The NOP was distributed for public review to solicit responses to help the County identify the full scope and range of potential environmental concerns associated with the Project so that these issues could be fully examined in this EIR. Comments on the NOP were received from the following individuals and agencies:

- Native American Heritage Commission
- California Air Resources Board
- California Department of Fish and Wildlife
- South Coast Air Quality Management District
- Riverside Transit Agency
- Southwest Regional Council of Carpenters
- Center for Community Action and Environmental Justice
- Center for Biological Diversity
- Guy Brossard (Resident)
- Harrison Shelton (Resident)

In addition, a publicly-noticed EIR Scoping Meeting was held at the Riverside County Administrative Center, located at 4080 Lemon Street, Riverside, California, 92501 on April 5, 2021, which provided members of the general public an additional opportunity to comment on the scope of environmental issues to be addressed in this Program EIR.

An Initial Study was not prepared for the proposed Project, and as such this Program EIR evaluates all of the environmental topics identified in Appendix G to the State CEQA Guidelines and in the County's standard Environmental Assessment (EA) Checklist form. Based Appendix G, the County's EA Checklist form, and in consideration of all comments received by the County on the NOP and during the EIR Scoping Meeting, Section 4.0 of this Program EIR evaluates the Project's potential to cause adverse effects to the following environmental issue areas:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Paleontological Resources
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire



The Project’s potential to result in growth-inducing impacts are discussed in Section 5.0, *Other CEQA Considerations*, of this Program EIR. The NOP, public review distribution list, and written comments received by the County during the NOP public review period are provided in *Technical Appendix A* to this EIR. Please refer to Table 1-1, *Summary of NOP Comments*, for summarized comments received during NOP public review period.

Table 1-1 Summary of NOP Comments

Commenter	Date	Comment(s)	Location in EIR Where Comment(s) Addressed
Native American Heritage Commission (NAHC)	March 15, 2021	<ul style="list-style-type: none"> Project is subject to Native American Consultation pursuant to Assembly Bill (AB) 52 and Senate Bill (SB) 18 Prepare a cultural resources assessment to evaluate potential impacts to archaeological and historical resources 	<ul style="list-style-type: none"> Subsections 4.5 (Cultural Resources) and 4.19 (Tribal Cultural Resources) Subsections 4.5 (Cultural Resources) and 4.19 (Tribal Cultural Resources)
California Air Resources Board (CARB)	April 13, 2021	<ul style="list-style-type: none"> The Project would result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment that emit toxic diesel emissions, and contribute to regional air pollution and global climate change The Project would increase exposure to air pollution in disadvantaged communities The EIR should quantify and discuss the potential cancer risks from Project construction and operation 	<ul style="list-style-type: none"> Subsections 4.3 (Air Quality) and 4.8 (Greenhouse Gas Emissions) Subsection 4.3 (Air Quality) Subsection 4.3 (Air Quality)
California Department of Fish and Wildlife (CDFW)	April 8, 2021	<ul style="list-style-type: none"> Assess direct, indirect, and cumulative impacts to biological resources, including impacts to flora and fauna, with particular emphasis on identifying rare, threatened endangered, and other sensitive species and associated habitat Identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts to biological resources, to the extent feasible Evaluate consistency of the Project with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) 	<ul style="list-style-type: none"> Subsection 4.4 (Biological Resources) Subsection 4.4 (Biological Resources) Subsection 4.4 (Biological Resources)



Table 1-1 Summary of NOP Comments

Commenter	Date	Comment(s)	Location in EIR Where Comment(s) Addressed
South Coast Air Quality Management District (SCAQMD)	April 6, 2021	<ul style="list-style-type: none"> • Requests an analysis of air quality impacts based on SCAQMD guidance • Requests an analysis of consistency with the 2016 Air Quality Management Plan • Incorporate mitigation measures and other features per the California Air Resources Board <i>Air Quality and Land Use Handbook: A Community Health Perspective</i> and the SCAQMD <i>CEQA Air Quality Handbook</i> • Evaluate air quality emissions against the SCAQMD regional and localized thresholds for both construction and operations • Identify feasible mitigation measures to address Project-related air quality impacts • Identify alternatives to reduce or avoid air quality impacts 	<ul style="list-style-type: none"> • Subsection 4.3 (Air Quality) • Subsection 4.3 (Air Quality) • Subsection 4.3 (Air Quality) • Subsection 4.3 (Air Quality) • Subsection 4.3 (Air Quality) • Section 6.0 (Alternatives)
Riverside Transit Agency (RTA)	March 30, 2021	<ul style="list-style-type: none"> • Indicates that there are no active transit routes in the local area 	<ul style="list-style-type: none"> • N/A
Southwest Regional Council of Carpenters	March 19, 2021 and April 8, 2021	<ul style="list-style-type: none"> • Requests notification for any and all notices associated with the Project • Requests that the Project be conditioned to provide community benefits • Requests that measures be identified to address potential effects associated with COVID-19, particularly during construction 	<ul style="list-style-type: none"> • N/A • Section 3.0 (Project Description) • N/A
Center for Community Action and Environmental Justice	April 6, 2021	<ul style="list-style-type: none"> • Concerns over proliferation of warehouse developments • The Project would conflict with the Housing Crisis Act of 2019 	<ul style="list-style-type: none"> • Subsection 4.11 (Land Use and Planning) • Subsection 4.11 (Land Use and Planning)
Center for Biological Diversity	March 12, 2021	<ul style="list-style-type: none"> • Requests to be included on future notifications regarding the Project. 	<ul style="list-style-type: none"> • N/A
Guy Brossard (Resident)	March 29, 2021	<ul style="list-style-type: none"> • Expresses general opposition to the Project • Concerns over noise pollution, light pollution, and air pollution 	<ul style="list-style-type: none"> • N/A • EIR Subsections 4.1 (Aesthetics), 4.3 (Air Quality), and 4.13 (Noise)



Table 1-1 Summary of NOP Comments

Commenter	Date	Comment(s)	Location in EIR Where Comment(s) Addressed
		<ul style="list-style-type: none"> Concerns over truck traffic in the local area and site access Concerns over impacts to wildlife species, including coyotes, owls, hawks, rabbits, and reptiles 	<ul style="list-style-type: none"> EIR Subsection 4.18 (Transportation) EIR Subsection 4.4 (Biological Resources)
Harrison Shelton (Resident)	March 16, 2021	<ul style="list-style-type: none"> Concerns over traffic circulation and effects on the existing circulation system Concerns over operational and vehicular traffic noise Concerns over flooding issues, particularly on Hostettler Road Concerns over freeway access and lack of infrastructure to handle Project truck trips Concerns over nesting eagles Requests information regarding the allowable uses within the Project Concerns over the change in land use designation to allow for light industrial and business park uses in lieu of medium density residential uses 	<ul style="list-style-type: none"> EIR Subsection 4.18 (Transportation) EIR Subsection 4.13 (Noise) EIR Subsection 4.18 (Transportation) EIR Subsection 4.4 (Biological Resources) Subsection 4.11 (Land Use and Planning) Subsection 4.11 (Land Use and Planning)

1.4.2 CONTENT AND ORGANIZATION OF THIS PROGRAM EIR

This Program EIR contains all of the information required to be included in an EIR as specified by the CEQA Statutes and Guidelines (California Public Resources Code, Section 21000 et. seq. and California Code of Regulations, Title 14, Chapter 5). This Program EIR is organized in the following manner:

- Section S.0, Executive Summary**, provides an overview of the Program EIR document and CEQA process. The Project, including its objectives, is described, and the location and regional setting of the Project site is documented. In addition, the Executive Summary discloses potential areas of controversy related to the Project, including those issues identified by other agencies and the public, and identifies potential alternatives to the proposed Project that would reduce or avoid significant impacts, as required by CEQA. Finally, the Executive Summary provides a summary of the Project’s impacts, mitigation measures, and conclusions, in a table that forms the basis of the EIR’s Mitigation, Monitoring, and Reporting Program.
- Section 1.0, Introduction**, provides introductory information about the CEQA process and the responsibilities of the County of Riverside, serving as the Lead Agency for this EIR; a brief description



of the Project; the purpose of this EIR; applications proposed by the Project Applicant that would require discretionary County approvals; permits and approvals required by other agencies; and an overview of the EIR format.

- **Section 2.0, Environmental Setting**, describes the environmental setting, including an overview of the regional and local setting, as well as descriptions of the Project site’s physical conditions and surrounding context. The existing setting is defined as the condition of the Project site and surrounding area at the approximate date this EIR’s NOP was released for public review on March 11, 2021. The setting discussion also addresses the relevant regional planning documents that apply to the Project site and vicinity.
- **Section 3.0, Project Description**, serves as the EIR’s Project Description for purposes of CEQA and contains a level of specificity commensurate with the level of detail proposed by the Project, including the summary requirements pursuant to State CEQA Guidelines § 15123. This section provides a detailed description of the Project, including its purpose and main objectives; design features; landscaping; site drainage; utilities; grading and construction characteristics; and operational characteristics expected over the Project’s lifetime. In addition, the discretionary actions required of the County of Riverside and other government agencies to implement the Project are discussed.
- **Section 4.0, Environmental Analysis**, provides an analysis of the potential direct, indirect, and cumulatively-considerable impacts that may occur from implementing the proposed Project. The topics analyzed in this section include the topics summarized above under subsection 1.4.1. A conclusion concerning significance is reached for each discussion, and mitigation measures are presented as warranted. The environmental changes identified in Section 4.0 and throughout this EIR are referred to as “effects” or “impacts” interchangeably. The State CEQA Guidelines also describe the terms “effects” and “impacts” as being synonymous (State CEQA Guidelines § 15358).

In the environmental analysis subsections of Section 4.0, the existing conditions are disclosed that are pertinent to the subject area being analyzed, accompanied by a specific analysis of physical impacts that may be caused by implementing the proposed Project. Impacts are evaluated on a direct, indirect, and cumulative basis. Direct impacts are those that would occur directly as a result of the proposed Project. Indirect impacts represent secondary effects that would result from Project implementation. Cumulative effects are defined in State CEQA Guidelines § 15355 as “...two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.”

The analyses in Section 4.0 are based in part upon technical reports that are appended to this Program EIR. Information also is drawn from other sources of analytical materials that directly or indirectly relate to the proposed Project and are cited in Section 7.0, *References*. Where the analysis demonstrates that a physical adverse environmental effect may or would occur without undue speculation, feasible mitigation measures are recommended to reduce or avoid the significant effect. Mitigation measures must be fully enforceable, have an essential nexus to a legitimate governmental interest, and be



“roughly proportional” to the impacts of the Project. The discussion then indicates whether the identified mitigation measures would reduce impacts to below a level of significance. In most cases, implementation of the mitigation measures would reduce the adverse environmental impacts to below a level of significance. If mitigation measures are not available or feasible to reduce an identified impact to below a level of significance, the environmental effect is identified as a significant and unavoidable adverse impact, for which a Statement of Overriding Considerations (SOC) would need to be adopted by the County of Riverside pursuant to State CEQA Guidelines § 15093.

- **Section 5.0, Other CEQA Considerations**, includes specific topics that are required by CEQA. These include a summary of the Project’s significant and unavoidable environmental effects, a discussion of the significant and irreversible environmental changes that would occur should the Project be implemented, as well as potential growth-inducing impacts of the proposed Project.
- **Section 6.0, Project Alternatives**, describes and evaluates alternatives to the proposed Project that could reduce or avoid the Project’s adverse environmental effects. CEQA does not require an EIR to consider every conceivable alternative to the Project but rather to consider a reasonable range of alternatives that will foster informed decision making and public participation. A range of three (3) alternatives is presented in Section 6.0.
- **Section 7.0, References**, cites all reference sources used in preparing this Program EIR and lists the agencies and persons that were consulted during preparation of this Program EIR. Section 7.0 also lists the persons who authored or participated in preparing this Program EIR.

CEQA requires that an EIR contain, at a minimum, certain specified content. Table 1-2, *Location of CEQA Required Topics*, provides a quick reference in locating the CEQA-required sections within this document.

1.4.3 INCORPORATION BY REFERENCE

State CEQA Guidelines § 15147 states that the “information contained in an EIR shall include summarized... information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public,” and that the “placement of highly technical and specialized analysis and data in the body of an EIR shall be avoided.” State CEQA Guidelines § 15150 allows for the incorporation “by reference all or portions of another document... [and is] most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of a problem at hand.” The purpose of incorporation by reference is to assist the Lead Agency in limiting the length of this Program EIR. Where this Program EIR incorporates a document by reference, the document is identified in the body of the EIR, citing the appropriate section(s) of the incorporated document and describing the relationship between the incorporated part of the referenced document and this EIR.

Therefore, the detailed technical studies, reports, and supporting documentation that were used in preparing this Program EIR are bound separately as Technical Appendices. The Technical Appendices are available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92502,



Table 1-2 Location of CEQA Required Topics

CEQA Required Topic	State CEQA Guidelines Reference	Location in this EIR
Table of Contents	§ 15122	Table of Contents
Summary	§ 15123	Section S.0
Project Description	§ 15124	Section 3.0
Environmental Setting	§ 15125	Section 2.0
Consideration and Discussion of Environmental Impacts	§ 15126	Section 4.0
Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented	§ 15126.2(b)	Section 4.0 & Subsection 5.1
Significant Irreversible Environmental Impacts Which Would be Involved in the Proposed Action Should it be Implemented	§ 15126.2(c)	Subsection 5.2
Growth-Inducing Impacts of the Proposed Project	§ 15126.2(d)	Subsection 5.3
Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects	§ 15126.4	Section 4.0 & Table S-1
Consideration and Discussion of Alternatives to the Proposed Project	§ 15126.6	Section 6.0
Effects Not Found to be Significant	§ 15128	Subsection 5.4
Organizations and Persons Consulted	§ 15129	Section 7.0 & Technical Appendices
Discussion of Cumulative Impacts	§ 15130	Section 4.0
Energy Conservation	Appendices F and G	Subsection 4.6

during the County’s regular business hours or can be requested in electronic form by contacting the County’s Planning Department. The individual technical studies, reports, and supporting documentation that comprise the Technical Appendices are as follows:

- A. Notice of Preparation and Written Comments on the NOP
- B. Air Quality Emissions Assessment
- C1. Biological Technical Report
- C2. Determination of Biological Equivalent or Superior Preservation
- D. Cultural Resources Assessment
- E. Energy Analysis
- F1. Updated Geotechnical Evaluation
- F2. 2003 Geotechnical Study (Southern Portions)
- F3. 2003 Geotechnical Study (Northern Portions)
- G1. Phase I Environmental Site Assessment Report
- G2. Phase II Environmental Site Assessment Report
- H1. Preliminary Drainage Report
- H2. Preliminary Water Quality Management Plan
- I. General Plan Consistency Analysis
- J1. Noise Assessment
- J2. Focused Traffic Route Noise Memorandum



- K. Paleontological Resource Impact Monitoring Program
- L1. Vehicle Miles Travelled Analysis
- L2. Traffic Analysis
- L3. Focused Traffic Assessment (Horsethief Driveway Alignment)
- L4. Focused Traffic Assessment (Alternative Site Access)
- M. Water Supply Assessment
- N. Fire Protection Plan
- O. Draft Specific Plan No. 333, Amendment No. 1

Other reference sources that are incorporated into this EIR by reference are listed in Section 7.0, *References*, of this EIR. In most cases, documents or websites not included in the EIR’s Technical Appendices are cited by a link to the online location where the document/website can be viewed by the public. All references relied upon by this EIR are included as part of Riverside County’s Administrative Record pertaining to the proposed Project.

1.5 RESPONSIBLE AND TRUSTEE AGENCIES

The California Public Resource Code (§ 21104) requires that all EIRs be reviewed by responsible and trustee agencies (see also CEQA Guidelines § 15082 and § 15086(a)). As defined by CEQA Guidelines § 15381, “the term ‘Responsible Agency’ includes all public agencies other than the Lead Agency which have discretionary approval power over the project.” A Trustee Agency is defined in CEQA Guidelines § 15386 as “a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California.”

For the proposed Project, the Santa Ana Regional Water Quality Control Board (RWQCB) is responsible for issuance of a National Pollutant Discharge Elimination System (NPDES) Permit to ensure that on-site water flows do not result in siltation, other erosional effects, or degradation of surface or subsurface water quality. The RWQCB also is responsible for issuance of a Construction Activity General Construction Permit, and for issuing a revised/amended Section 401 Permit pursuant to the Clean Water Act (revisions to the Section 401 Permit are limited to an updated description of the proposed Project). The U.S. Army Corps of Engineers is responsible for issuing an amended/revised Section 404 Permit (revisions to the Section 404 permit are limited to an updated description of the proposed Project). The California Department of Fish and Wildlife (CDFW) is a Trustee Agency that would be responsible for issuing a revised/amended Section 1602 Streambed Alteration Agreement (“SAA”; revisions to the SAA are limited to an updated description of the proposed Project). The Riverside County Flood Control and Water Conservation District (RCFCWCD) is responsible for approval of the Project’s proposed drainage infrastructure. The South Coast Air Quality Management District (SCAQMD) is responsible for issuance of permits and approvals associated with operation of stationary equipment, if proposed. The Elsinore Valley Municipal Water District (EVMWD) is responsible for approving the Project’s proposed water and sewer connections and associated improvements. There are no other agencies that are identified as Responsible Trustee Agencies for the proposed Project.



1.6 AREAS OF CONTROVERSY

Substantive issues raised in response to the NOP were previously summarized in Table 1-1. The purpose of this table is to present the primary environmental issues of concern raised by public agencies and the general public during the NOP review period. The table is not intended to list every comment received by the County during the NOP review period. Regardless of whether or not a comment is listed in the table, all applicable comments received in responses to the NOP are addressed in this Program EIR. Based on comments received during the NOP review period, a number of concerns were expressed regarding the Project's potential impacts to the environment, as summarized in Table 1-1. Issues of concern include aesthetics, air quality, biological resources, cultural resources, greenhouse gas emissions, land use/planning, noise, transportation, and tribal cultural resources. No other areas of controversy were identified as part of the NOP process.

1.7 ISSUES TO BE RESOLVED BY THE DECISION-MAKING BODY

The primary issues to be resolved by the decision-making body for the proposed Project involves the Project's significant and unavoidable impacts under the issue areas of agricultural/forestry resources, air quality, and transportation, which are addressed in EIR Subsections 4.2, 4.3, and 4.18, respectively. The Riverside County Board of Supervisors will need to evaluate whether the mitigation measures proposed to reduce the Project's unavoidable impacts adequately reduce Project impacts to the maximum feasible extent. The Board of Supervisors also will make a determination as to whether the Project's benefits outweigh these adverse environmental effects in support of adopting a Statement of Overriding Consideration's pursuant to State CEQA Guidelines § 15093. Finally, the Board of Supervisors will decide whether to approve one of the Project alternatives in lieu of the proposed Project, if it is determined that one of the alternatives is feasible and its approval would serve to substantially reduce or avoid significant environmental impacts.



2.0 ENVIRONMENTAL SETTING

This Section 2.0 is provided pursuant to State CEQA Guidelines § 15125(a), and includes a description of the physical environmental conditions in the vicinity of the Project site and its off-site improvement areas from both a local and regional perspective as it existed at the time the Notice of Preparation (NOP) was published for this Program EIR, which occurred on March 11, 2021. This section provides a brief overview of resources on and surrounding the Project site; additional detail regarding existing conditions for individual issue areas (e.g., biology, geology, etc.) is provided within the appropriate subsection headings within Section 4.0, *Environmental Analysis*, of this Draft Program EIR.

2.1 REGIONAL SETTING AND LOCATION

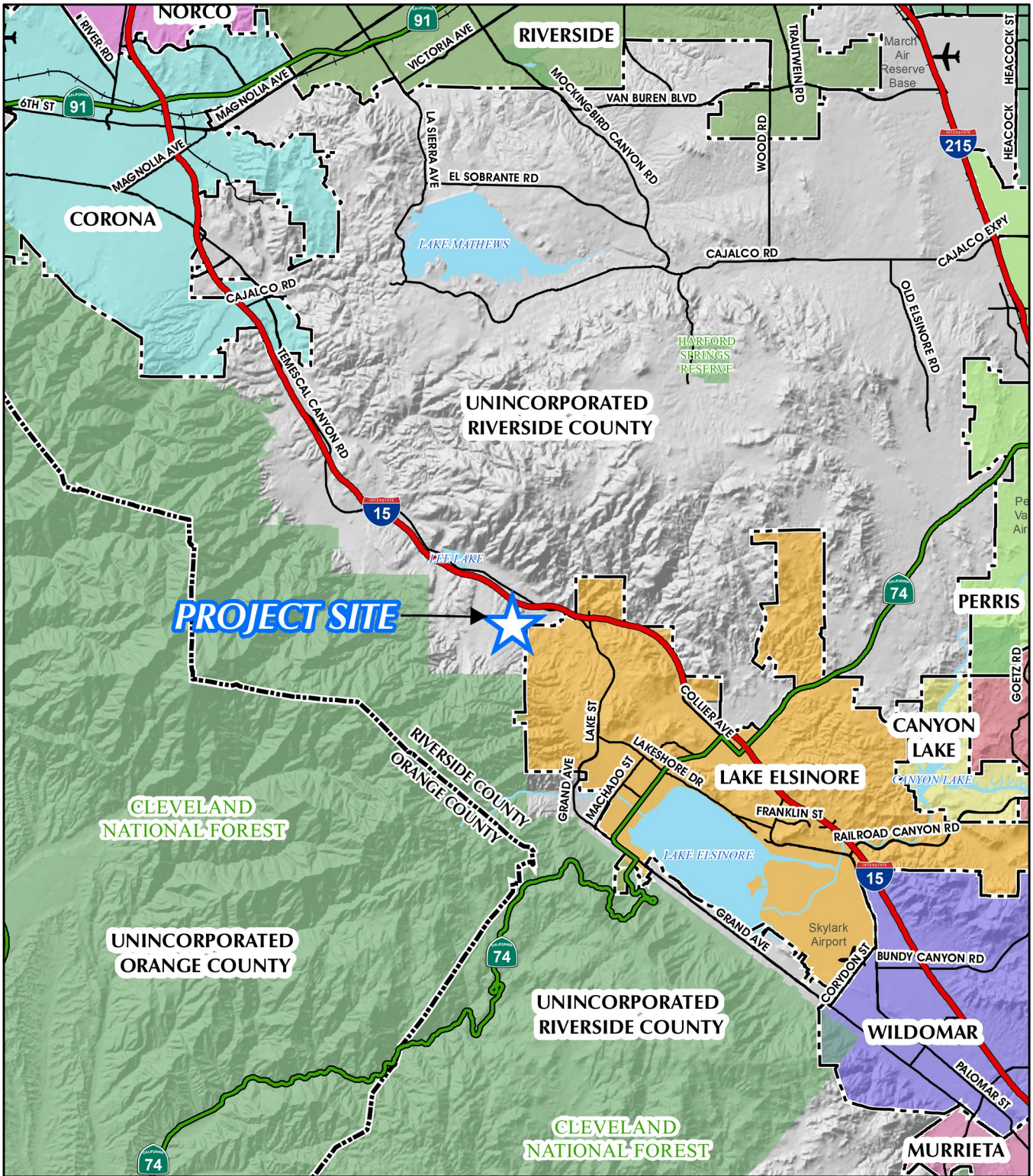
The 157.1-acre Project site is located within the western portion of unincorporated Riverside County, California. Figure 2-1, *Regional Map*, depicts the Project site's location within the regional vicinity. As shown, Riverside County abuts San Bernardino County to the north; Orange County to the west; and San Diego and Imperial Counties to the south. Riverside County is located in an urbanizing area of southern California commonly referred to as the Inland Empire. The Inland Empire is an approximate 28,000 square-mile region comprising western San Bernardino County, western Riverside County, and the eastern reaches of Los Angeles County. As of 2018, SCAG estimates that Riverside County as a whole had a population 2,493,000. SCAG estimates that the population will increase to 3.25 million by 2045. (SCAG, 2020, Demographics and Growth Forecast Technical Appendix, Table 13)

2.2 LOCAL SETTING AND LOCATION

The Project site is located within the western region of unincorporated Riverside County, California. As depicted on Figure 2-2, *Vicinity Map*, the Project site is located near the community of Lake Elsinore and adjacent to the Horsethief Canyon Ranch community. More specifically, and as depicted on Figure 2-2, the 157.1-acre site is located east of Horsethief Canyon Road, south of Interstate 15 (I-15), north of Palomino Creek Drive, and north and west of Hostettler Road. The Project site includes Assessor Parcel Numbers (APNs) 393-120-010 and -011; 393-150-001 through -075; 393-180-004 through -010; 393-250-001 through -041; 393-260-001 through -068; 393-270-001 through -027; 393-280-001 through -087; 393-290-001 through -055; 393-300-001 through -028; 393-310-005; and 394-020-002 through -003. The 157.1-acre site occurs within Section 17, Township 5 South, Range 5 West, San Bernardino Baseline and Meridian. (RCIT, 2021)

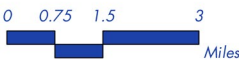
2.3 SURROUNDING LAND USES AND DEVELOPMENT

As shown on Figure 2-3, *Surrounding Land Uses and Development*, lands to the south of the Project site include medium-density residential uses and an elementary school (Luiseño Elementary School). To the west of the Project site are medium-density residential uses, a recreational facility (Horsethief Canyon Park), and the Horsethief Canyon Wastewater Treatment Plant, with undeveloped lands occurring west of the northwestern Project boundary. To the north of the Project site are several rural residences, a small area of

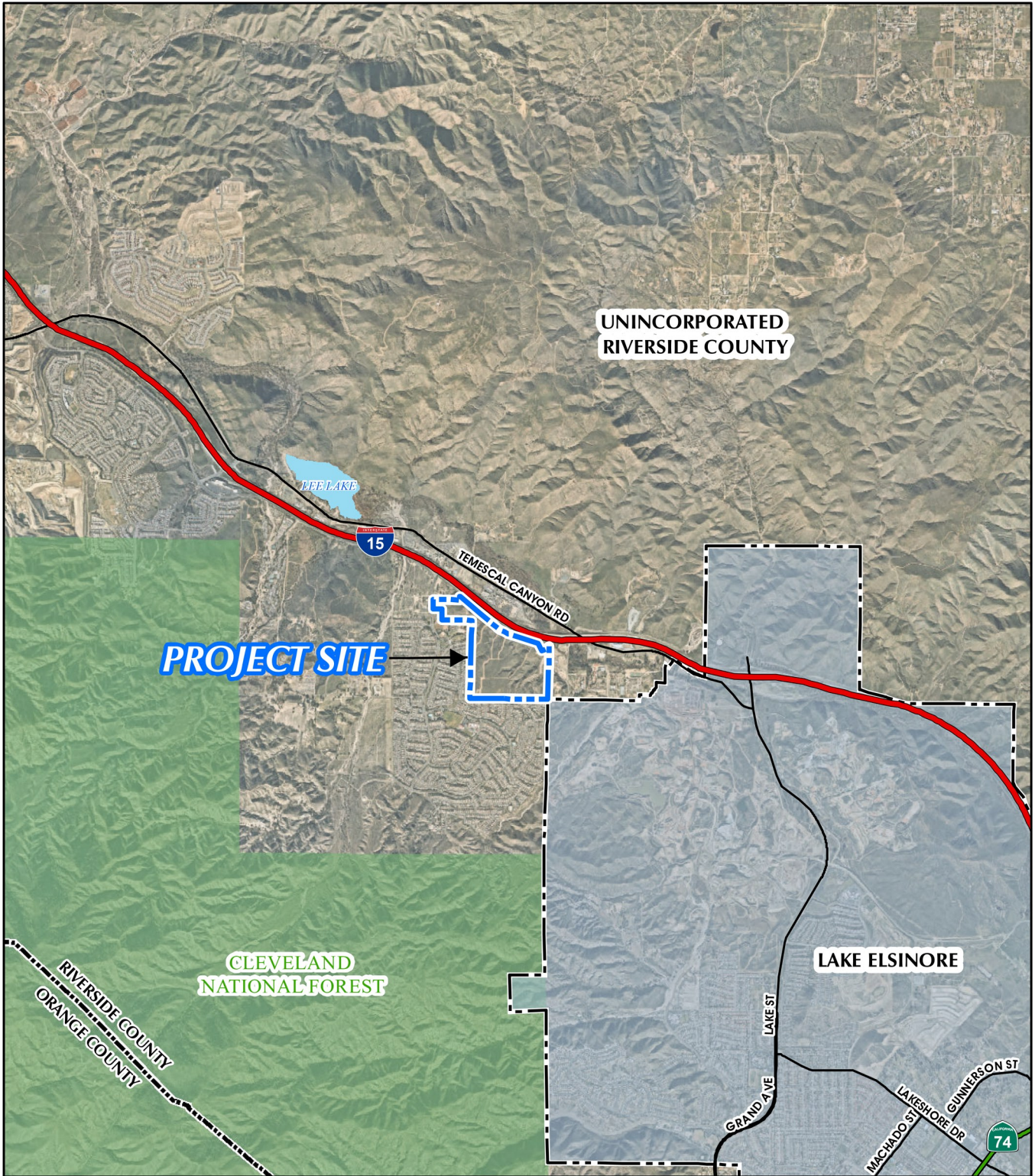


Source(s): ESRI, RCLMA (2021)

Figure 2-1

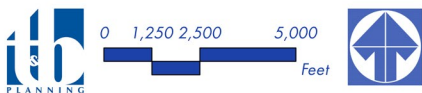


Regional Map



Source(s): ESRI, RCTLMA (2021), Nearmap Aerial (2022)

Figure 2-2

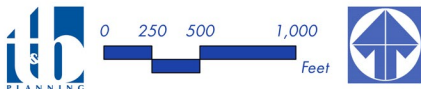


Vicinity Map



Source(s): Nearmap Aerial (2022), RCTLMA (2021)

Figure 2-3



Surrounding Land Uses and Development



open space and I-15, beyond which are several light industrial/business park uses and open space. To the east of the Project site are several rural residential dwelling units, open space, and an existing construction storage yard. The City of Lake Elsinore boundary occurs immediately southeast of the Project site.

2.4 LOCAL PLANNING CONTEXT

State CEQA Guidelines § 15125(d) requires that EIRs identify the general plans and regional plans that are applicable to the project under evaluation, and recognize potential inconsistencies. Plans that are applicable to the Project evaluated herein are summarized below, with additional information provided in the applicable resource discussions in Section 4.0, *Environmental Analysis*.

2.4.1 CONNECT SoCAL (SCAG REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY)

The Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code § 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project site is within SCAG's regional authority. As an MPO and public agency, SCAG develops transportation and housing strategies that transcend jurisdictional boundaries that affect the quality of life for southern California as a whole. On September 3, 2020, SCAG's Regional Council adopted *Connect SoCal (2020-2045 Regional Transportations Plan/Sustainable Communities Strategy)*. Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions (CTCs), tribal governments, non-profit organizations, businesses, and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. Connect SoCal includes over 4,000 transportation projects, ranging from highway improvements, railroad grade separations, bicycle lanes, new transit hubs and replacement bridges. These future investments were included in county plans developed by the six CTCs and seek to reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices. The goals of Connect SoCal are to: 1) encourage regional economic prosperity and global competitiveness; 2) improve mobility, accessibility, reliability, and travel safety for people and goods; 3) enhance the preservation, security, and resilience of the regional transportation system; 4) increase person and goods movement and travel choices within the transportation system; 5) reduce greenhouse gas emission and improve air quality; 6) support healthy and equitable communities; 7) adapt to a changing climate and support an integrated regional development pattern and transportation network; 8) leverage new transportation technologies and data-driven solutions that result in more efficient travel; 9) Encourage development of diverse housing types in areas that are supported by multiple transportation options; and 10) Promote conservation of natural and agricultural lands and restoration of habitats. (SCAG, 2020)

2.4.2 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT AIR QUALITY MANAGEMENT PLAN (AQMP)

Currently, the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are exceeded in most parts of the South Coast Air Basin. In response, and in conformance with California Health & Safety Code § 40702 et seq. and the California Clean Air Act, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the state and federal ambient air quality



standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. Each version of the plan is an update of the previous plan and has a 20-year horizon with a revised baseline. The most recent AQMP was adopted by the AQMD Governing Board on March 3, 2017 (“2016 AQMP”). The 2016 AQMP incorporates the latest scientific and technological information and planning assumptions and updated emission inventory methodologies for various source categories. The 2016 AQMP is based on assumptions provided by the Emission FACtor model (EMFAC) developed by the California Air Resources Board (CARB) for motor vehicle information and assumptions provided by SCAG for demographics. The air quality levels projected in the 2016 AQMP are based on the assumption that development associated with general plans, specific plans, residential projects, and wastewater facilities will be constructed in accordance with SCAG’s population growth projections. The 2016 AQMP also assumes that such development projects will implement strategies to reduce emissions generated during the construction and operational phases of development. (SCAQMD, 2017)

2.4.3 RIVERSIDE COUNTY GENERAL PLAN AND ELSINORE AREA PLAN

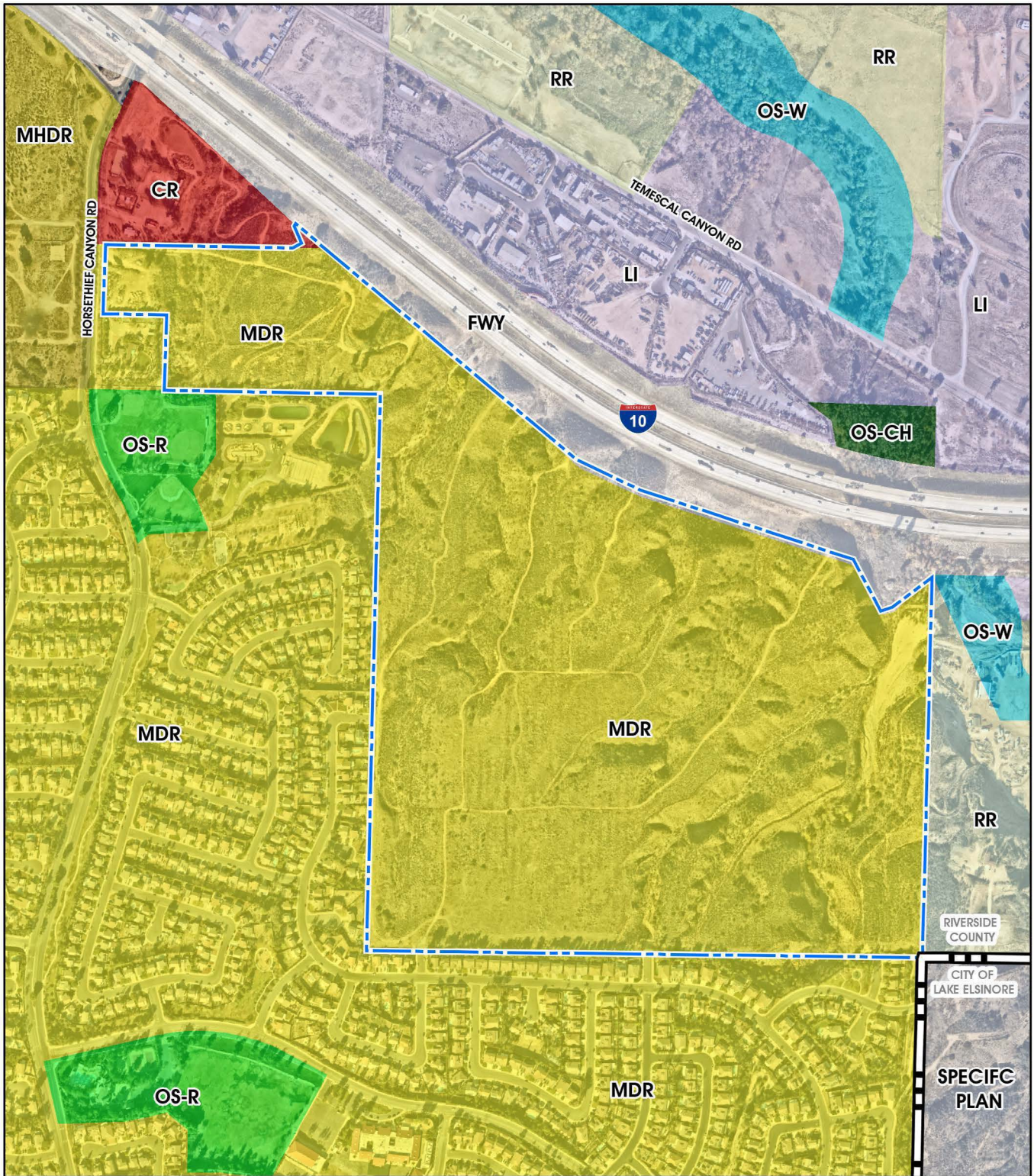
The prevailing planning document for the Project site and its surrounding area is the Riverside County General Plan. The Project site is located within the Elsinore Area Plan (EAP) of the Riverside County General Plan. As depicted on Figure 2-4, *Existing General Plan Land Use Designations*, the 157.1-acre Project site is currently located within the adopted Renaissance Ranch Specific Plan No. 333 (SP 333). The General Plan and EAP designate the majority of the property for “Medium Density Residential (MDR)” land uses, with a small sliver in the northern corner of the Project site designated for “Commercial Retail (CR)” land uses. The MDR land use designation allows for single-family residential development at a density range of 2 to 5 dwelling units per acre (du/ac). The CR land use designation allows for local and regional serving retail and service uses. (Riverside County, 2021b, Table 1)

2.4.4 RENAISSANCE RANCH SPECIFIC PLAN NO. 333 (SP 333)

The Renaissance Ranch Specific Plan No. 333 (SP 333) was approved by the Riverside County Board of Supervisors in 2005 and encompasses the 157.1-acre Project site. Figure 2-5, *Existing Renaissance Ranch Specific Plan Land Use Designations*, depicts the approved SP 333 land use plan. As shown, the adopted SP 333 allows for up to 355 Medium Density Residential dwelling units on 98.7 acres, with minimum lot sizes ranging from 5,000 s.f. to 8,000 s.f. in size; a Community Park on 4.3 acres; four pocket parks on 2.0 acres; Open Space/Conservation land uses on 27.1 acres; and Open Space/Drainage uses on 25.7 acres. (Riverside County, 2005)

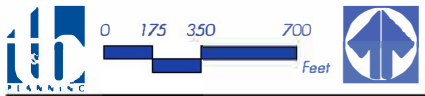
2.4.5 ZONING

Under existing conditions, the 157.1-acre Project site is zoned for “Specific Plan Zone (SP Zone),” indicating that the property is within the boundaries of an adopted specific plan. As such, the 157.1-acre Project site is subject to the zoning classifications established by the adopted SP 333, which generally reflect the land use designations applied to the site as part of SP 333 (described above).

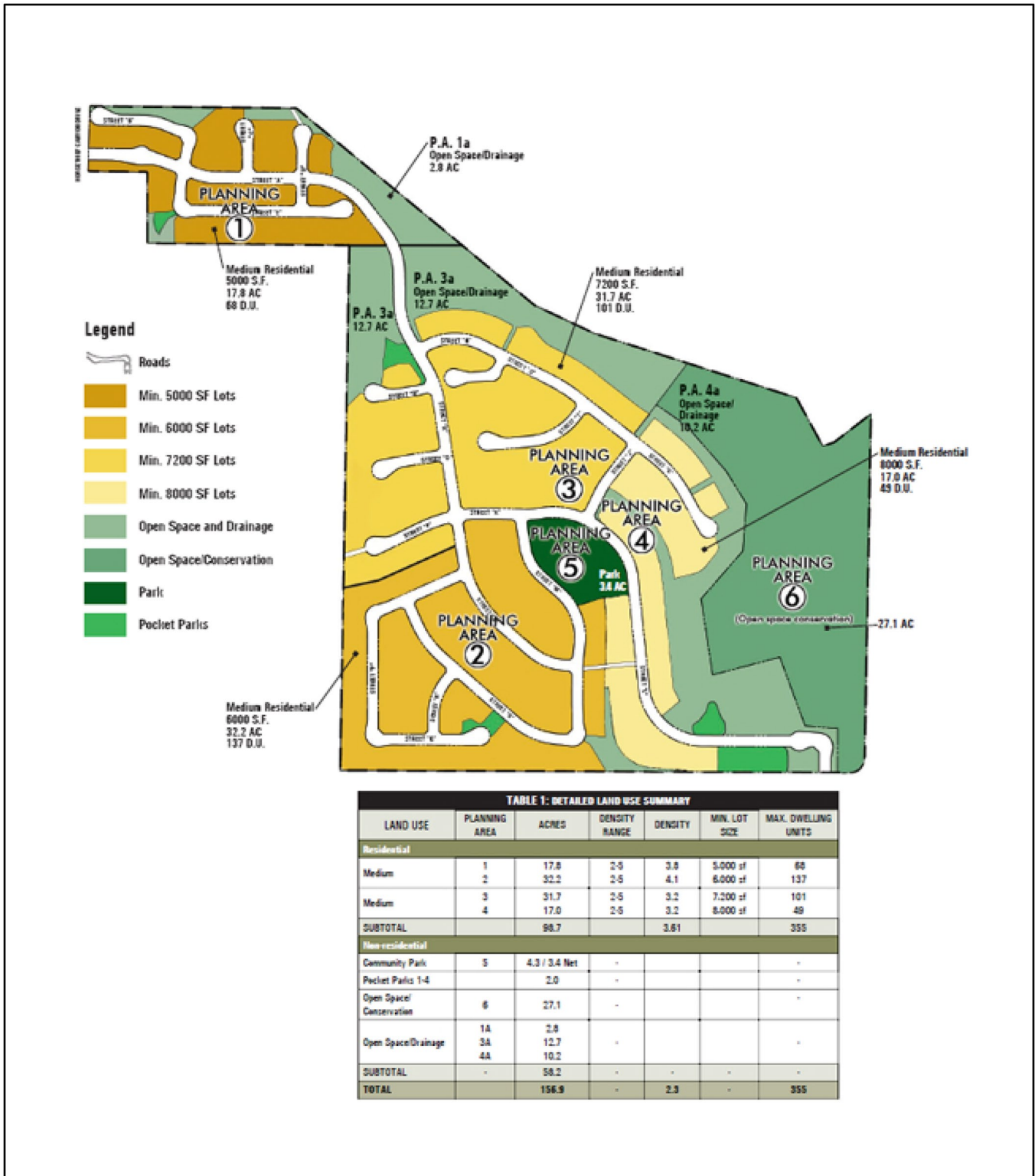


Source(s): Nearmap Aeria (2021), RCTLMA (2021)

Figure 2-4



Existing General Plan Land Use Designations



Source(s): Renaissance Ranch Specific Plan (2005)

Figure 2-5



Not to Scale



Existing Renaissance Ranch
Specific Plan Land Use Designations



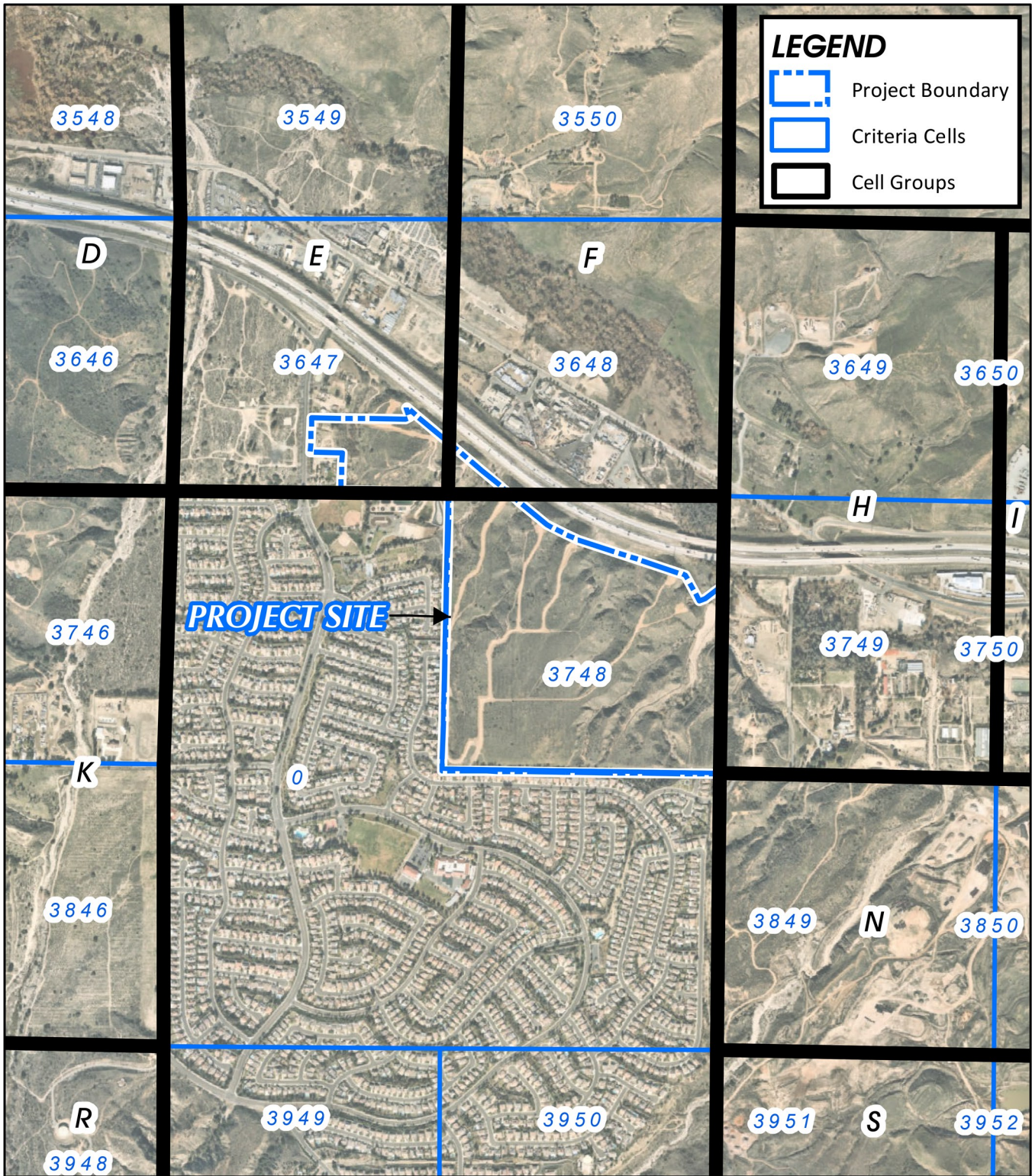
2.4.6 WESTERN RIVERSIDE COUNTY MULTIPLE SPECIES HABITAT CONSERVATION PLAN

The Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), a regional Habitat Conservation Plan (HCP), was adopted on June 17, 2003, and an Implementing Agreement (IA) was executed between the United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and participating entities. The intent of the Western Riverside County MSHCP is to preserve native vegetation and meet the habitat needs of multiple species, rather than focusing preservation efforts on one species at a time. The MSHCP identifies Criteria Areas, in which habitat conservation efforts are targeted.

As shown on Figure 2-6, *MSHCP Cell Groups and Criteria Cells*, the entire Project site is located within MSHCP Criteria Cells of the Elsinore Area Plan (EAP). A majority of the Project site is located within EAP Cell Number 3748, which is not located within a Cell Group. The northwestern corner of the Project site is located within EAP Cell Number 3647, which comprises the southern extent of Cell Group E. A small portion of the Project site is located within Cell Number 3648, which comprises the southern extent of Cell Group F. A description of the MSHCP requirements for these Cells and Cell Groups is provided below: (RCIT, 2021)

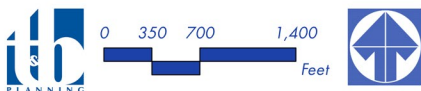
- **EAP Cell 3748.** EAP Cell 3748 encompasses a majority of the Project site. Conservation within EAP Cell 3748 is intended to contribute to assembly of Proposed Constrained Linkage 6, and focuses on riparian habitat associated with Temescal Wash and adjacent chaparral and coastal sage scrub habitat. Conservation within EAP Cell 3748 is planned to range from 40%-50% of the Cell focusing in the eastern portion of the Cell. (RCIT, 2021; Riverside County, 2003, Table 3-4)
- **EAP Cell Group E (EAP Cell 3647).** EAP Cell 3647, which is part of EAP Cell Group E, encompasses the northwestern portions of the Project site. Conservation within the portions of EAP Cell Group E that are located east of I-15 are intended to contribute to assembly of Proposed Extension of Existing Core 2, while conservation within the portion of Cell Group E that are located west of I-15 are intended to contribute to assembly of Proposed Constrained Linkage 5. Conserved areas are intended to be focused on riparian scrub, woodland, and forest habitat associated with Temescal Wash and adjacent upland habitat. Conservation within EAP Cell Group is planned to range from 40%-50% of Cell Group E focusing in the northern portion of the Cell Group. (RCIT, 2021; Riverside County, 2003, Table 3-4)
- **EAP Cell Group F (EAP Cell 3648).** A small portion of the Project site occurs in the southwest corner of EAP Cell 3648, which forms the southern extent of EAP Cell Group F. Conservation within EAP Cell Group F is intended to contribute to the assembly of Proposed Extension of Existing Core 2. Conservation within this Cell Group is intended to focus on riparian habitat associated with Temescal Wash and adjacent coastal sage scrub and grassland habitat. Conservation within EAP Cell Group F is planned to range from 65%-75% of the Cell Group focusing in the northern portion of the Cell Group. (RCIT, 2021; Riverside County, 2003, Table 3-4)

In addition to conservation criteria within areas designated to be included within the MSHCP Reserve System, the MSHCP also identifies a number of additional survey and conservation requirements. The Project site is



Source(s): RCTLMA (2021) Nearmap Aerial (2022)

Figure 2-6



MSHCP Cell Groups and Criteria Cells



located within the Criteria Area Species Survey Area (CASSA) for Thread-leaved brodiaea, Davidson's saltscale, Parish's brittlescale, Smooth tarplant, Round-leaved filaree, Coulter's goldfields, and Little mousetail. The Project site also is located within the Narrow Endemic Plant Species Survey Area (NEPSSA) for Munz's onion, San Diego ambrosia, Slender-horned spineflower, Many-stemmed dudleya, Spreading navarretia, California Orcutt grass, San Miguel savory, Hammitt's clay-cress, and Wright's trichocoronis. A portion of the Project site, generally along the Project site's northern boundary with I-15, is located within the Burrowing Owl Survey Area. The Project site is not located with any amphibian or mammal species survey areas. (RCA, 2020)

2.5 EXISTING PHYSICAL SITE CONDITIONS

Pursuant to State CEQA Guidelines § 15125, the physical environmental condition for purposes of establishing the setting of an EIR is the environment as it existed at the time the EIR's NOP was released for public review. The NOP for this EIR was released for public review on March 11, 2021. The following subsections provide a description of the Project site's physical environmental condition ("existing conditions") as of that approximate date. The site's current physical conditions and surrounding areas are shown on Figure 2-7, *Aerial Photograph*. More detailed information regarding the Project's site's environmental setting as it relates to a specific environmental issue area is provided in the various subsections of EIR Section 4.0, *Environmental Analysis*.

2.5.1 LAND USE

As shown on Figure 2-7, the 157.1-acre Project site is vacant and undeveloped under existing conditions. The southeast portion of the Project site was partially used for agricultural uses including orchards from as early as the 1960s to 1997 (Hillmann, 2019, p. 17). Some debris still remains from a few former agricultural type structures in the southern portions of the site. Two former residences were observed in the northern portion of the site as well as a former truck trailer storage facility. Several informal dirt trails traverse the property. (Google Earth, 2018; Petra, 2020, pp. 3-4)

2.5.2 SITE TOPOGRAPHY

As shown on Figure 2-8, *USGS Topographic Map*, the southwestern portions of the Project site exhibit relatively level topography, with the remaining portions of the site containing undulating small hillforms. The property descends at a moderate gradient, generally in a northeasterly direction. Elevations on site range from approximately 1,187 feet above mean sea level (amsl) near the northeast corner of the Project site to 1,430 feet amsl at the southwest corner of the Project site. The overall topographic relief is approximately 243 feet. (Google Earth, 2018; Petra, 2020, p. 2)

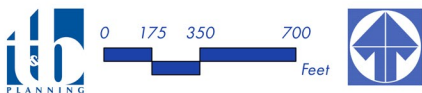
2.5.3 AIR QUALITY AND CLIMATE

The Project site is located in the 6,745-square-mile South Coast Air Basin (SCAB), which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bound by the Pacific Ocean to the west and the San Gabriel, San Bernardino, the San Jacinto Mountains to the north and

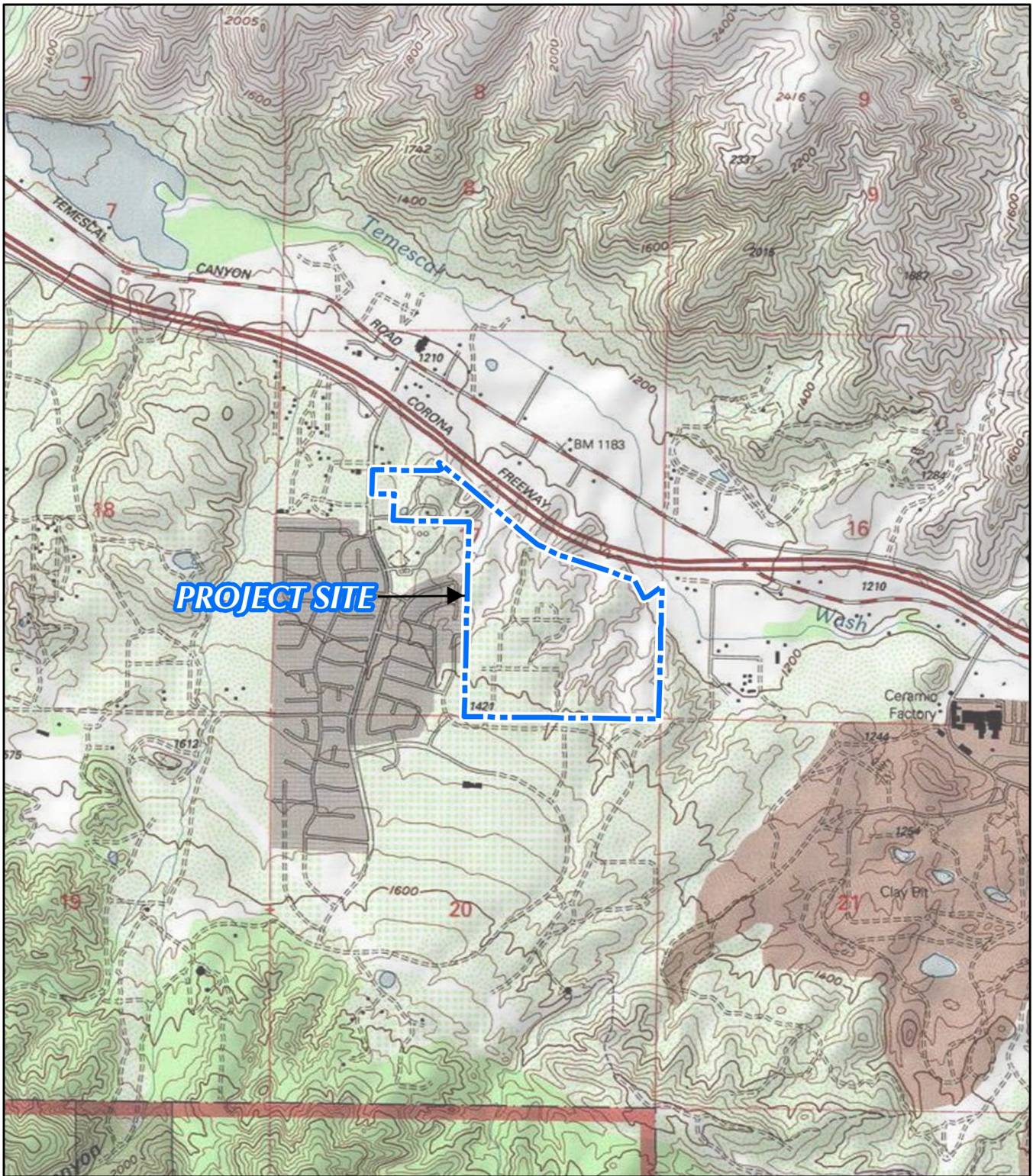


Source(s): Nearmap Aerial (2022), RCTLMA (2021)

Figure 2-7

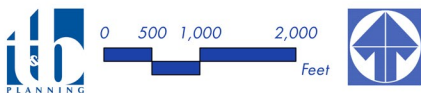


Aerial Photograph



Source(s): USGS (2019)

Figure 2-8



USGS Topographic Map



east, and San Diego County to the south. The SCAB is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD), the agency charged with bringing air quality in the SCAB into conformity with federal and State air quality standards. As documented in the Project's Air Quality Assessment (*Technical Appendix B* to this EIR), although the climate of the SCAB is characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. More than 90% of the SCAB's rainfall occurs from November through April. Temperatures during the year range from an average minimum of 36°F in January to over 100°F maximum in the summer. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Ana[s]" each year.

2.5.4 BIOLOGICAL RESOURCES

The Project site supports the following vegetation/land cover types: Brittle Bush Scrub, Disturbed California Buckwheat Scrub, Disturbed Chamise Chaparral, Southern Cottonwood Willow Riparian Forest, Unvegetated Wash, and Upland Mustards. Table 4.4-1 in EIR Subsection 4.4., *Biological Resources*, provides a summary of the vegetation types and their corresponding acreage. Photographs depicting the Project site are shown in Exhibit 8 of the Project's Biological Technical Report (*Technical Appendix C*). (GLA, 2020, p. 24)

The Project site occurs within Multiple Species Habitat Conservation Plan (MSHCP). The Project site is located within the MSHCP Narrow Endemic Plant Species Survey Area (NEPSSA) for Munz's onion, San Diego ambrosia, Slender-horned spineflower, Many-stemmed dudleya, Spreading navarretia, California Orcutt grass, San Miguel savory, Hammitt's clay-cress, and Wrights's trichocoronis. The Project site also is located in the Criteria Area Plant Species Survey Areas (CAPSSA) for thread-leaved brodiaea, Davidson's saltscale, Parish's brittlescale, smooth tarplant, round-leaved filaree, Coulter's goldfields, and little mousetail. Table 4-2 of the Project's Biological Technical Report ("BTR"; *Technical Appendix C*) provides a list of special-status plants evaluated for the Project site through general biological surveys, habitat assessments, and focused surveys. No special-status plants were detected at the Project site. Refer to EIR Subsection 4.4, *Biological Resources*, for a detailed description of sensitive plants that occur or have the potential to occur on site. (GLA, 2020, p. 26)

The following special-status animals were detected at the Project site during the 2020 biological surveys: coast horned lizard and coastal California gnatcatcher. Table 4-3 of the Project's Biological Technical Report ("BTR"; *Technical Appendix C*) provides a list of special-status animals evaluated for the Project site through general biological surveys, habitat assessments, and focused surveys. Refer to EIR Subsection 4.4, *Biological Resources*, for a detailed description of sensitive animals that occur or have the potential to occur on site. (GLA, 2020, p. 35)

2.5.5 GEOLOGY

The Project site is situated in the northern portion of the Peninsular Range Province of Southern California. In general, the Peninsular Ranges are underlain primarily of plutonic rock of the Southern California Batholith. These rocks formed from the cooling of molten magma deep within the earth's crust. Intense heat associated



with the plutonic magma metamorphosed the ancient sedimentary rocks into which the plutons intruded. Specifically, the site is located in the western portion of the Perris Peneplain, which is a broad valley bounded on three sides by mountain ranges: the San Jacinto Mountains on the east, the San Bernardino Mountains on the north, and the Santa Ana Mountains to the west. The northwestern extent of the Perris Peneplain is the Santa Ana River. The Peneplain is a large depositional basin composed primarily of materials eroded from the granitic bedrock surfaces of the Southern California Batholith. Granitic and/or metasedimentary bedrock related to the Santa Ana Mountains are located just to the south of the site. (Hillman, 2019, pp. 5-6)

At a local scale, the Project site is located on the distal portion of a large alluvial fan emanating from the Santa Ana mountains further to the southwest. These fan deposits are generally mapped as Pleistocene aged older fan deposits and are incised by various recent drainages generally trending to the north. These incised drainages have been infilled with recent alluvium including active wash deposits and existing undocumented fill. Older fan deposits are generally located in the elevated portions of the site. Recent alluvium is prominently in the eastern portion of the site and within the drainages overlying the older fan deposits. In some places, a thin veneer of topsoil and/or colluvium is present above the older fan deposits and younger alluvium. Existing artificial fill from past residential development is present along the southern and western edges of the site. Undocumented fill is present in various places on the site due to undocumented filling of canyons with trash and debris and well as for bridging drainages for agriculture purposes. (Hillman, 2019, p. 6)

2.5.6 SOILS

Table 2-1, *Summary of On-Site Soil Characteristics*, provides a summary of the soils present on the Project site, and identifies the attendant rate of runoff and erosion susceptibility. As shown, approximately 8.4% of the Project site has a “Slow” rate of runoff and a “Slight” susceptibility to erosion. Approximately 50.6% of the Project site has a “Slight to Moderate” rate of erosion and a “Slight to Moderate” susceptibility to erosion. Approximately 40.9% of the Project site is not rated by the United States Department of Agriculture (USDA) for rate of runoff or erosion susceptibility. (USDA, 1971, pp. 36, 40, and 60; USDA, 2021)

Table 2-1 Summary of On-Site Soil Characteristics

Map Symbol	Map Unit Name	Rate of Runoff	Erosion Susceptibility	Acres in AOI ¹	Percent of AOI ¹
GhC	Gorgonio loamy sand, 0 to 8 percent slopes	Slow	Slight	0.0	0.0%
GhD	Gorgonio loamy sand, 8 to 15 percent slopes	Slow	Slight	13.3	8.4%
HdD2	Hanford cobbly coarse sandy loam, 2 to 15 percent slopes, eroded	Slow to Medium	Slight to Moderate	79.6	50.6%
TeG	Terrace escarpments	--	--	64.3	40.9%
Totals for Area of Interest:		--	--	157.1	100.0%

1. Totals reflect rounding.
(USDA, 1971, pp. 36, 40, and 60; USDA, 2021)

2.5.7 HYDROLOGY

The topography of the Project site generally slopes from a south to north/northeast with elevations on site ranging from 1,187 feet amsl near the northeast corner of the Project site to 1,430 feet amsl at the southwest



corner of the Project site. The Temescal Wash crosses the northeastern portion of the Project site as it flows northerly under the I-15 Freeway. Other smaller natural watercourses cross the Specific Plan and generally flow from south to north. More specifically, under existing conditions, the Project site contains eleven separate drainage areas. These drainage areas convey runoff to seven (7) runoff concentration points with existing culverts traversing the I-15 freeway to Temescal Wash and Alberhill Creek/Temescal Wash to the north. The existing 100-year storm flows from the Project site are approximately 657.62 cubic feet per second. (K&A, 2020a, p. 20)

2.5.8 NOISE

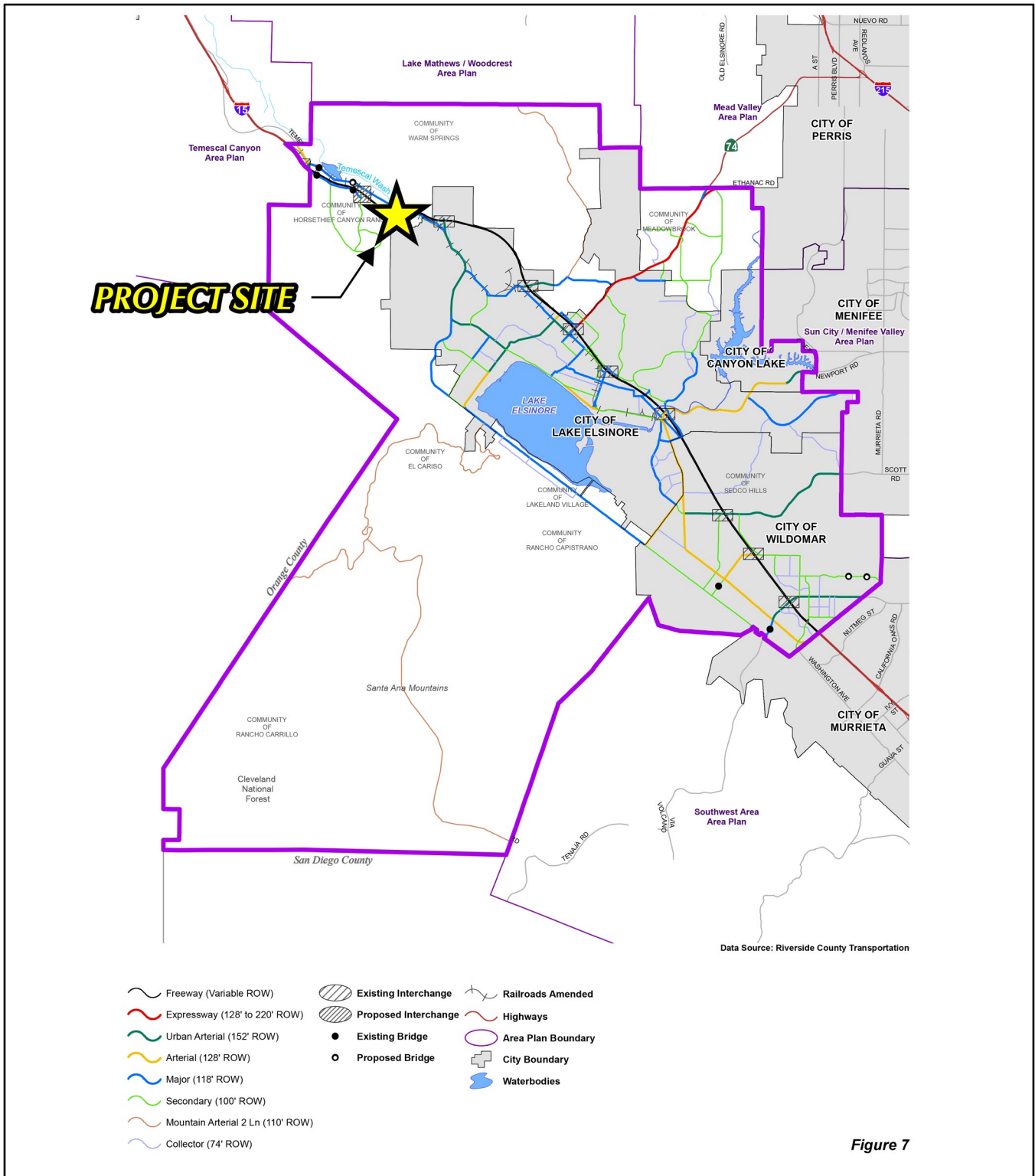
The most common and significant source of noise in Riverside County is mobile noise generated by transportation-related sources. Other sources of noise are the various land uses (i.e., residential, commercial, and institutional) that generate stationary-source noise. The Project site is bound to the west by Horsethief Canyon Road, which serves residential, recreational, public facilities, and agricultural land uses. As shown in EIR Table 4.13-3, the ambient recorded noise levels in the Project area range from 57.3 to 61.8 dBA CNEL and 53.8 to 58.8 dBA Leq. Refer to EIR Subsection 4.13, *Noise*, for additional information regarding the site's existing noise conditions.

2.5.9 TRANSPORTATION

Vehicular access to the Project site is provided via Horsethief Canyon Road, which abuts the western boundary of the Project site. I-15 occurs along the northern boundary of the Project site, with the nearest on and off ramps occurring at Lake Street, approximately 1.3 miles to the east of the site, and at Indian Truck Trail, approximately 1.6 miles northwest of the site. State Route 74 (SR-74) occurs approximately 4.4 miles southeast of the Project site, State Route 91 (SR-91) occurs approximately 12.1 miles to the northwest of the Project site, and Interstate 215 (I-215) occurs approximately 11.8 miles to the northeast of the Project site. (Google Earth, 2018)

As shown on Figure 2-9, *Elsinore Area Plan Circulation Plan*, the Riverside County General Plan and EAP classify Horsethief Canyon Road as a "Secondary (100' ROW)" facility. De Palma Road west of Horsethief Canyon Road and Temescal Canyon Road are classified as a "Major (118' ROW)" facilities. Lake Street, which occurs within the City of Lake Elsinore, is classified as an "Urban Arterial (152' ROW)." (Riverside County, 2021b, Figure 7)

Under existing conditions, no pedestrian or bicycle facilities have been constructed on the Project site, with exception of several informal trails that occur throughout the site (Google Earth, 2018). As shown on Figure 2-10, *Elsinore Area Plan Trails and Bikeway System*, the General Plan and EAP do not identify any planned trails or bikeways within the Project site. A Community Trail is planned along the southern and western boundaries of the Project site, and along the site's frontage with Horsethief Canyon Road. (Riverside County, 2021b, Figure 8)



Source(s): Elsinore Area Plan (08-2020)

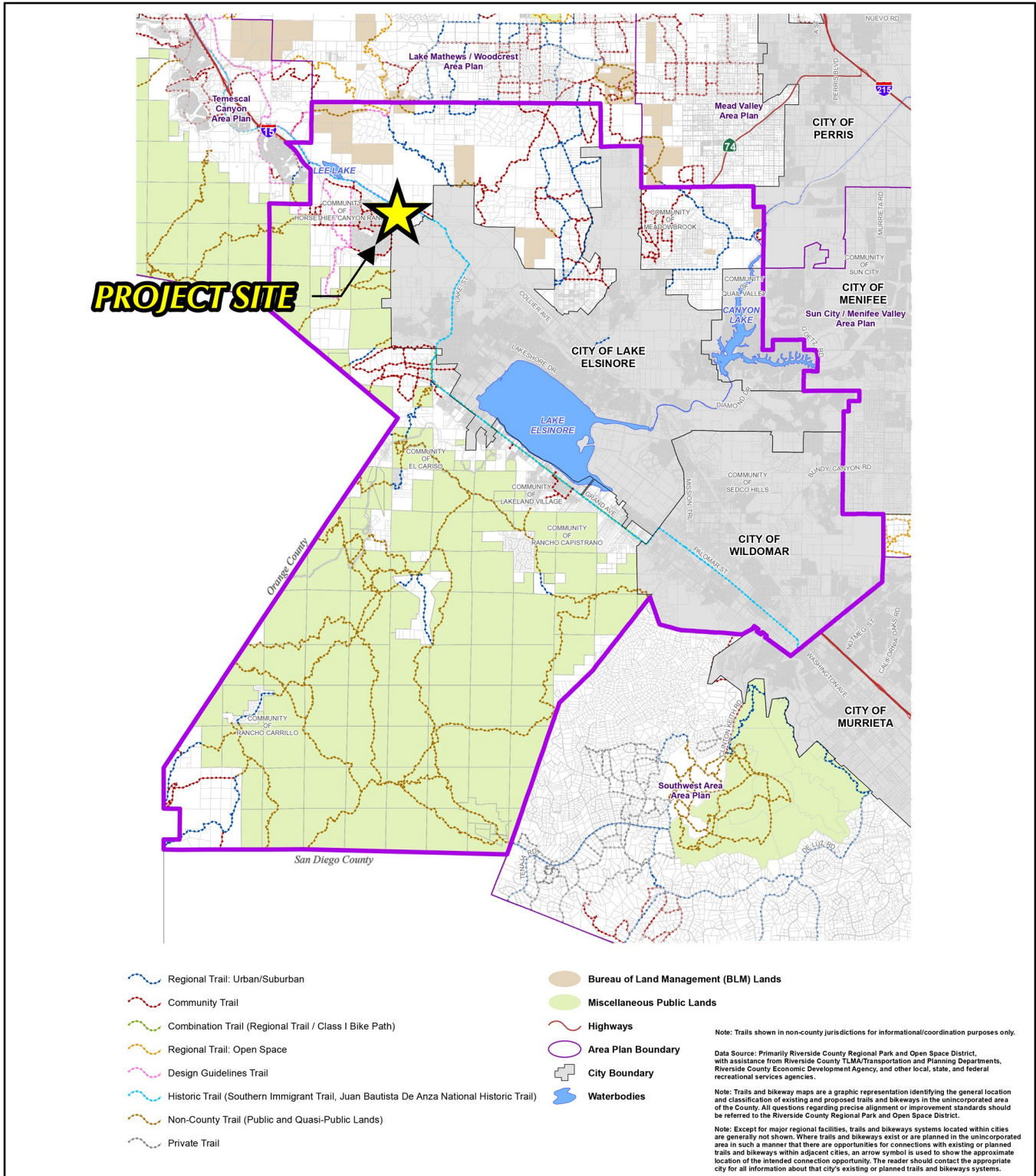
Figure 2-9



Not to Scale



Elsinore Area Plan Circulation Plan



Source(s): Elsinore Area Plan (08-2020)

Figure 2-10



Not to Scale



Elsinore Area Plan Trails and Bikeway System



2.5.10 PUBLIC FACILITIES

Fire protection services in the Project area are primarily provided by the Riverside County Fire Department (RCFD). The primary fire station servicing the site would be RCFD Station 64 (Sycamore Creek), which is located approximately 2.4 roadway miles northwest of the Project site. Secondary fire protection services would be provided by RCFD Station 85 (McVicker Park), located approximately 5.1 roadway miles southeast of the Project site. Police protection services in the Project area are provided by the Riverside County Sheriff's Department (RCSD). The nearest sheriff's station to the Project site is the Lake Elsinore Station, located approximately 6.4 miles southeast of the Project site at 333 West Limited Avenue in the City of Lake Elsinore. In addition to community policing, other services provided by the Sheriff's Department include, but are not limited to, operating of the emergency 911 system, operating correctional facilities, performing traffic control, and providing crime prevention education. Also, the Sheriff's Department coordinates with volunteer groups such as Neighborhood Watch Programs and the Community Oriented and Policing Problem Solving (COPPS) Program and the Community Oriented Policing (COP) Program.

2.5.11 UTILITIES AND SERVICE SYSTEMS

A. Water Service

The Elsinore Valley Municipal Water District (EVMWD) provides potable service to the Project area. The Project site occurs within two (2) EVMWD Pressure Zones. The northern portion of the Project site occurs within the 1434 Pressure Zone, while the central and southern portions of the Project site occur within the 1601 Pressure Zone. Within the 1434 Pressure Zone, there is an existing 12-inch water line located north of I-15 within Horsethief Canyon Road that terminates just north of the I-15. Within the 1601 Pressure Zone, there is an existing 12-inch water main south of I-15 within Horsethief Canyon Road, which terminates approximately 930 feet south of I-15. Existing water mains ranging from 8 to 20 inches also occur within residential streets to the west and south of the Project site, including within Eagle Run Street, Palomino Creek Drive, and Bolo Court, and there is a 20-inch water main within Hostettler Road to the southeast/east of the Project site.

Recycled water within the Project area is provided by the Horsethief Canyon Water Reclamation Facility (WRF), located off-site near the northwestern portion of the Project site. The Horsethief Canyon WRF was operating at capacity and is planned for expansion to accommodate planned growth in the local area. Recycled Water from the Horsethief Canyon WRF is pumped to the 1518 Pressure Zone to serve the existing Horsethief Canyon Ranch community. The existing Recycled Water system includes an 8-inch 1518 Pressure Zone Recycled Water line in Horsethief Canyon Road along the frontage of the Project site, and runs southeasterly along Mountain Road to connect the existing Horsethief 1601 Pressure Zone reservoir (located approximately 0.7-mile south of the Project site). The 1518 Pressure Zone in the area does not connect to the 1801 Pressure Zone Reservoir.

B. Sewer Service

Wastewater service in the Project area is provided by the EVMWD. Wastewater generated in the Project area is conveyed to the Horsethief Canyon WRF, located immediately off site to the west/southwest of the Project site, near the Project's northwestern boundary. The Horsethief Canyon WRF is currently operating at, or near,



its design capacity and plans are underway by EVWMD to expand the capacity of the Horsethief WRF to serve the existing and planned development within the Project area. Under existing conditions, there are several existing gravity sewer lines in the Project area, including a 10-inch sewer main within Hostettler Road between Bolo Court and Palomino Creek Drive, a 10-inch sewer main within Palomino Creek Drive (west of Hostettler Road), 10- to 15-inch sewer mains within Eagle Run Street, and a 12-inch sewer main within Horsethief Canyon Road, between Cloudburst Drive and the Horsethief WRF. There also is an existing 6-inch force main within Hostettler Road that extends from Bolo Court to Palomino Creek Drive, and within Palomino Creek Drive between Hostettler Road and Bucking Bay Drive.

C. Solid Waste Services

The Riverside County Department of Waste Resources (RCDWR) is responsible for the efficient and effective landfill disposal of non-hazardous county waste within the County, and operates six active landfills in addition to holding a contract agreement to dispose of waste at the private El Sobrante Landfill (Riverside County, 2015, p. 4.17-36). Solid waste from the Project site would be taken to the El Sobrante Landfill for disposal. The El Sobrante Landfill is located at 10910 Dawson Canyon Road in Riverside County, east of the Interstate 15 and south of the City of Corona. Solid waste also could be taken to the Lamb Canyon Landfill or the Badlands Landfill, which are both located within Riverside County (Riverside County, 2015).

D. Other Services

The Project site also is located in the service territories of the Southern California Gas Company (natural gas) and Southern California Edison (electricity) (SCE, 2019; SoCalGas, 2016).

2.5.12 RARE AND UNIQUE RESOURCES

As required by State CEQA Guidelines § 15125(c), the environmental setting should identify any inconsistencies between a proposed project and applicable general, specific, or regional plans, and place special emphasis on resources that are rare or unique to that region and would be affected by the project. The principal discretionary actions required of Riverside County to implement the Project are described in detail in Section 3.0, *Project Description*, and are listed in Table 3-4, *Matrix of Project Approvals/Permits*. Based on the existing conditions of the Project site and surrounding area described above and discussed in more detail in Section 4.0, *Environmental Analysis*, the Project site does not contain any rare or unique resources.



3.0 PROJECT DESCRIPTION

This section provides all of the information required for an EIR Project Description by State CEQA Guidelines § 15124, including a description of the Project’s precise location and boundaries; a statement of the Project’s objectives; a description of the Project’s technical, economic, and environmental characteristics; and a description of the intended use of this EIR, including a list of the government agencies that are expected to use this EIR in their decision-making process; a list of the permits and approvals that are required to implement the project; and a list of related environmental review and consultation requirements.

3.1 REGIONAL SETTING

The 157.1-acre Project site is located within the western portion of unincorporated Riverside County, California. Figure 2-1 (previously presented) depicts the Project site’s location within the regional vicinity. As shown, Riverside County abuts San Bernardino County to the north; Orange County to the west; and San Diego and Imperial Counties to the south. Riverside County is located in an urbanizing area of southern California commonly referred to as the Inland Empire. The Inland Empire is an approximate 28,000 square-mile region comprising western San Bernardino County, western Riverside County, and the eastern reaches of Los Angeles County.

3.2 PROJECT LOCATION AND SETTING

As previously depicted on Figure 2-2, the Project site is located near the community of Lake Elsinore and adjacent to the Horsethief Canyon Ranch community. More specifically, the 157.1-acre site is located east of Horsethief Canyon Road, south of Interstate 15 (I-15), north of Palomino Creek Drive, and north and west of Hostettler Road. The 157.1-acre Project site is vacant and undeveloped under existing conditions. The southeast portion of the Project site was partially used for agricultural uses including orchards from as early as the 1960s to 1997 (Hillmann, 2019, p. 17). Lands to the south of the Project site include medium-density residential uses and an elementary school (Luiseño Elementary School). To the west of the Project site are medium-density residential uses, a recreational facility (Horsethief Canyon Park), and the Horsethief Canyon Wastewater Treatment Plant, with undeveloped lands occurring west of the northwestern Project boundary. To the north of the Project site are several rural residences, a small area of open space and I-15, beyond which are several light industrial/business park uses and open space. To the east of the Project site are several rural residential dwelling units, open space, and an existing construction storage yard. Refer to EIR subsection 2.0 for a detailed description of the local setting and surrounding land uses.

3.3 PROPOSED PROJECT

The proposed Project consists of applications for the first amendment to the Renaissance Ranch Specific Plan No. 333 (SP00333A01; herein referred to as “SP 333A1”), a General Plan Amendment (GPA200004), and Change of Zone (CZ2000016) to allow for future development of the 157.1-acre Project site with 18.0 acres of “Business Park” land uses, 97.2 acres of “Light Industrial” land uses, “Open Space – Conservation” on 11.5 acres, “Open Space – Conservation Habitat” on 27.1 acres, and major circulation facilities on 3.3 acres. As proposed by SP00333A01, areas designated for “Light Industrial” and “Business Park” uses may be developed



with a Floor Area Ratio (FAR) up to 0.50. Accordingly, the Project as evaluated herein would allow for the future development of up to 392,040 s.f. of “Business Park” building area and up to 2,117,016 s.f. of “Light Industrial” building area.

This EIR analyzes the physical effects associated with all components of the proposed Project, including planning, construction, and ongoing operation. The governmental approvals requested from Riverside County to implement the Project consist of the following:

1. Adoption by resolution of a General Plan Amendment (GPA200004);
2. Adoption of Amendment No. 1 to Specific Plan No. 333 (SP00333A01); and
3. Adoption by ordinance of a Change of Zone (CZ2000016).

The Project’s applications, as submitted to the County of Riverside by the Project Applicant, are herein incorporated by reference pursuant to State CEQA Guidelines § 15150 and are available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501. All other discretionary and administrative approvals that would be required of the County of Riverside or other government agencies are also within the scope of the Project analyzed in this EIR.

3.4 STATEMENT OF OBJECTIVES

The fundamental purpose and goal of the proposed Project is to accomplish the orderly development of underutilized property with an economically viable, employment-generating use to increase employment opportunities in a housing rich portion of unincorporated Riverside County. This underlying goal aligns with various aspects of the Southern California Association of Government’s (SCAG) 2020-2045 *Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS; also referred to as “Connect SoCal”), particularly the facilitation of goods movement industries and the generation of local employment opportunities that can reduce the need for long commutes to and from work. The following objectives are intended to achieve these underlying purposes:

- A. To efficiently develop an underutilized property with a complementary mix of employment-generating land uses, including light industrial and business park land uses.
- B. To assist the SCAG region in achieving jobs/housing balance region-wide and in the local area by providing additional job opportunities in a housing rich area of the Inland Empire that will reduce the need for members of the local workforce to commute outside the area for employment.
- C. To expand economic development, facilitate job creation, and increase the tax base for Riverside County by accommodating and diversifying facilities needed to support the goods movement supply chain.
- D. To establish development standards and design guidelines to ensure future development on site complements other existing and planned uses in the immediate vicinity and minimizes conflicts with other nearby land uses.



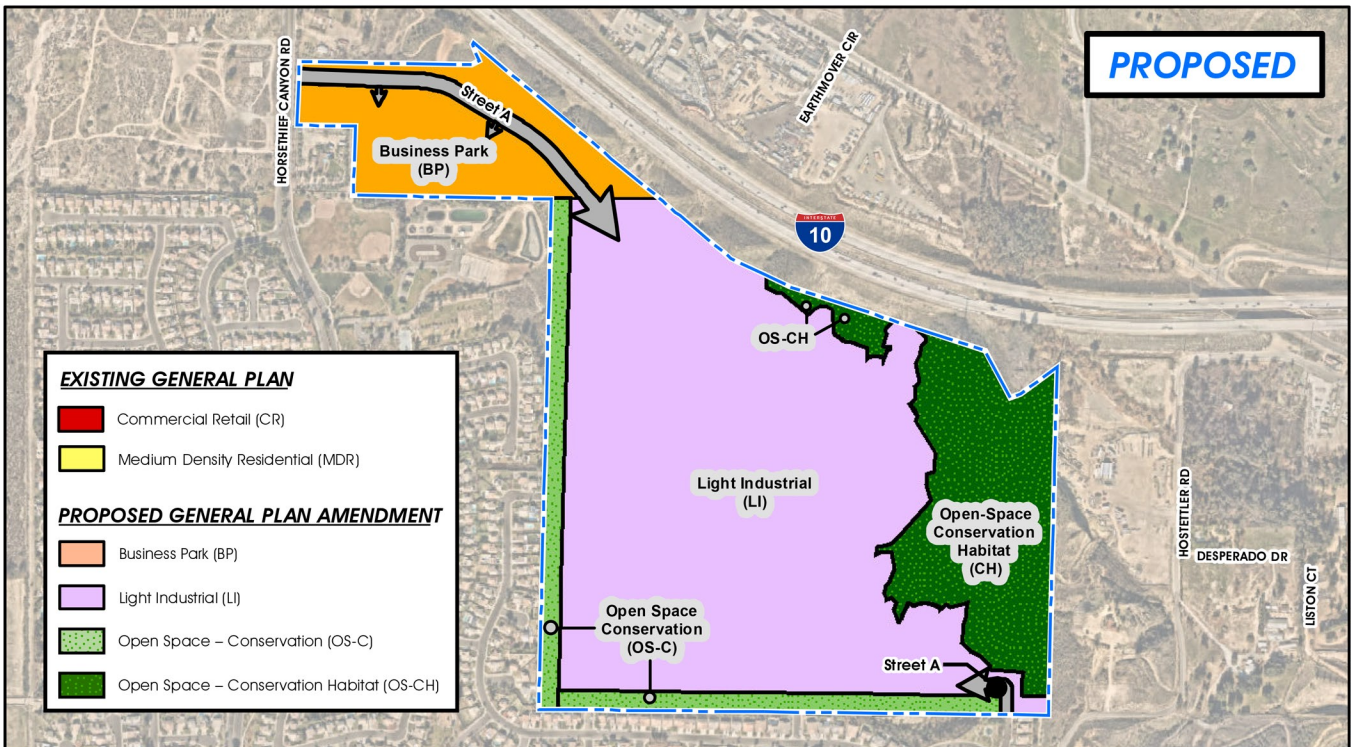
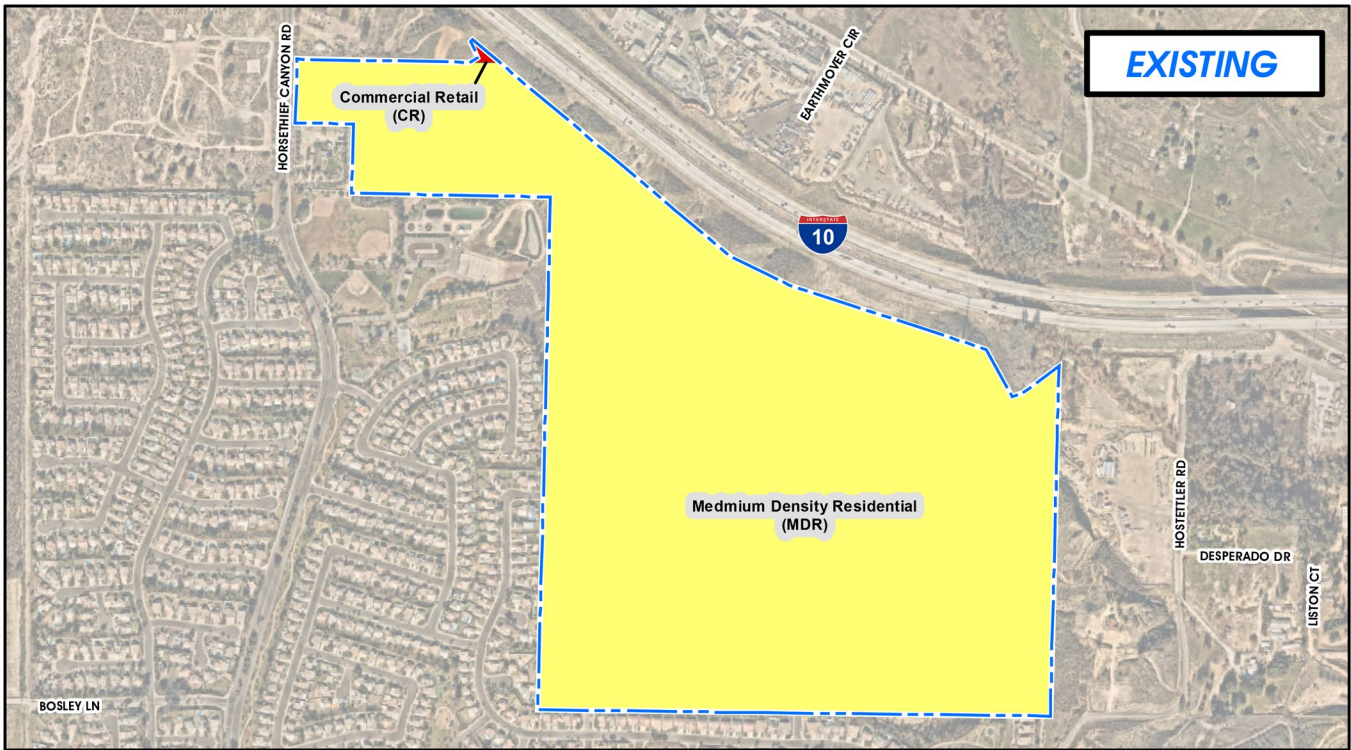
- E. To establish a unified thematic concept for future development through design elements such as architecture, monumentation, theme walls, and landscaping using a long-range comprehensive planning approach that cannot be accomplished on a parcel-by-parcel basis.
- F. To anticipate market demand by providing a mixture of light industrial and business park land uses in a master-planned commerce center that would be marketable within the evolving economic profile of western Riverside County.
- G. To develop a mix of light industrial and business park uses in unincorporated Riverside County that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar uses in the local area and region.
- H. To develop a property that has access to available infrastructure, including roads and utilities.

3.5 PROJECT'S COMPONENT PARTS AND DISCRETIONARY APPROVALS

The proposed Project consists of applications for General Plan Amendment No. 200004 (GPA200004), Amendment No. 1 to the Renaissance Ranch Specific Plan No. 333 (SP00333A01), and Change of Zone No. 2000016 (CZ2000016) to allow for future development of the 157.1-acre Project site with 18.0 acres of “Business Park” land uses, 97.2 acres of “Light Industrial” land uses, “Open Space – Conservation” on 11.5 acres, “Open Space – Conservation Habitat” on 27.1 acres, and major circulation facilities on 3.3 acres. The principal discretionary actions required of the County of Riverside to implement the Project are described in detail on the following pages. Additional discretionary and administrative actions that would be necessary to implement the proposed Project are listed in Table 3-5, *Matrix of Project Approvals/Permits*, at the end of this Section.

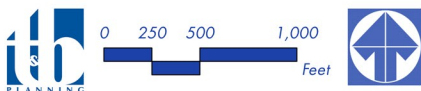
3.5.1 GENERAL PLAN AMENDMENT NO. 200004 (GPA200004)

The Riverside County General Plan assigns a land use designation to all properties within unincorporated Riverside County. The Project Applicant is seeking a General Plan Amendment (GPA No. 200004) to modify the land use designations for the Project site in order to reflect changes proposed as part of proposed SP 333A1, which is discussed below. As depicted on Figure 3-1, *General Plan Amendment No. 200004*, under existing conditions the Riverside County General Plan and Elsinore Area Plan (EAP) designate the majority of the property for “Medium Density Residential (MDR)” land uses, consistent with the adopted Specific Plan No. 333, while a small area in the northern portion of the Project site is currently designated for “Commercial Retail (CR)” land uses. Proposed GPA No. 200004 would amend the General Plan and EAP land use designations to reflect those proposed as part of SP 333A1, which would include “Business Park (BP)” land uses, “Light Industrial (LI)” land uses, “Open Space – Conservation (OS-C)” land uses, and “Open Space – Conservation Habitat (OS-CH)” land uses. The BP land use designation is intended to accommodate employee intensive uses, including research and development, technology centers, corporate offices, clean industry and supporting retail uses. The LI land use designation is intended to accommodate industrial and related uses



Source(s): ESRI, Nearmap (2021), RCTLMA (2021)

Figure 3-1





including warehousing/distribution, assembly and light manufacturing, repair facilities, and supporting retail uses. The OS-C land use designation is intended to provide for the protection of open space for natural hazard protection, cultural preservation, and natural and scenic resource preservation. The OS-CH land use designation Applies to public and private lands conserved and managed in accordance with adopted Multi Species Habitat and other Conservation Plans and in accordance with related Riverside County policies. (Riverside County, 2021b, Table 1)

3.5.2 CHANGE OF ZONE NO. 2000016 (CZ2000016)

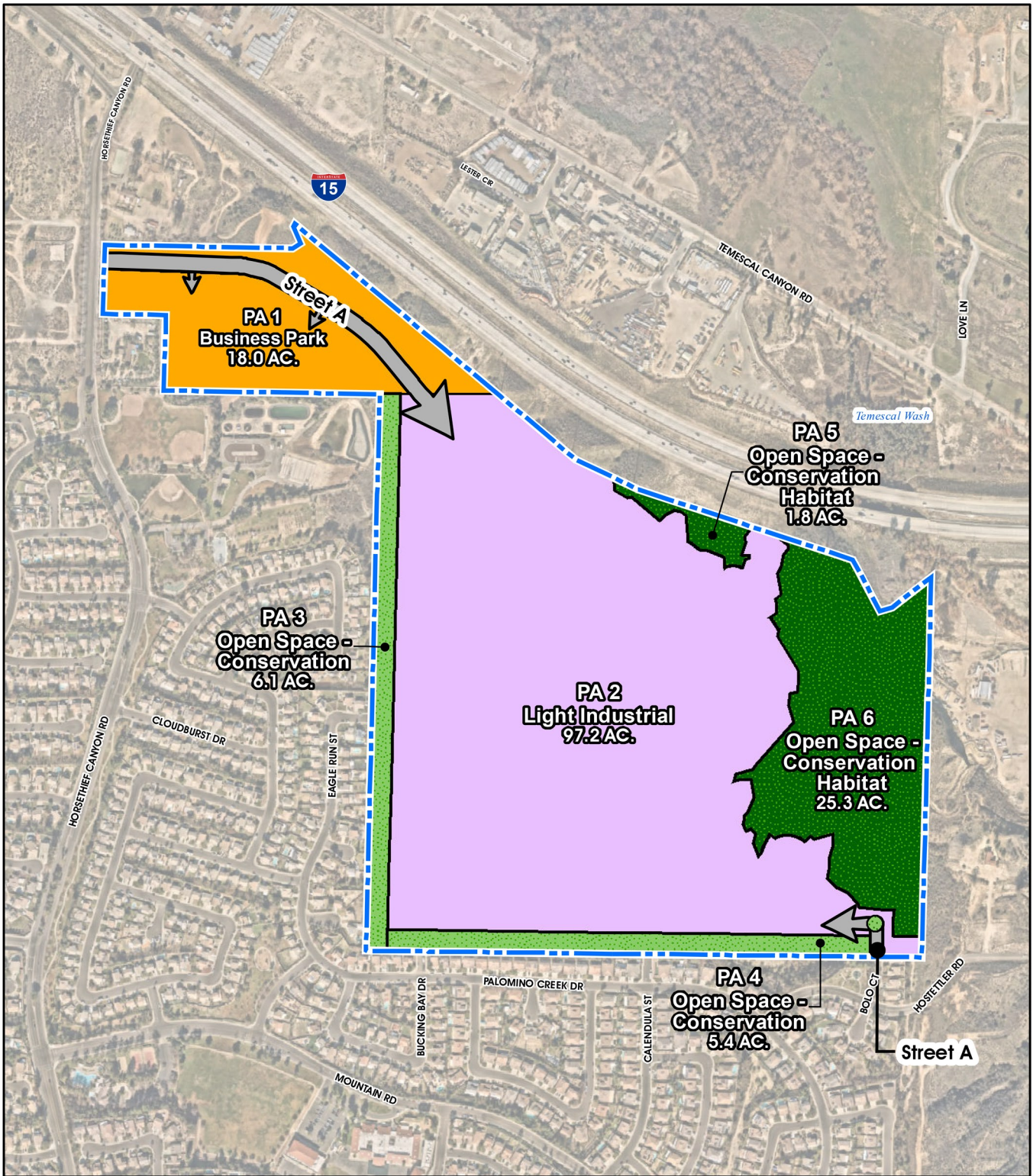
The Riverside County Zoning Ordinance, which is part of the County’s Municipal Code, assigns a zoning designation to all properties within unincorporated Riverside County. Development is required by law to comply with the provisions of the Zoning Ordinance. Under existing conditions, the 157.1-acre Project site is classified as “SP Zone,” indicating that the property is within the boundaries of an adopted specific plan. As such, the 157.1-acre Project site is subject to the zoning classifications established by the adopted Specific Plan No. 333, which generally reflect the land use designations applied to the site as part of Specific Plan No. 333. Proposed Change of Zone No. 2000016 (CZ2000016) would modify and establish the Planning Area boundaries, permitted uses, and development standards throughout the 157.1-acre site in order to reflect the land uses proposed as part of SP 333A1. Refer to subsection 3.5.3 for a description of the land uses proposed as part of SP 333A1.

3.5.3 SPECIFIC PLAN NO. 333, AMENDMENT NO. 1 (SP00333A01)

A. Proposed Land Uses

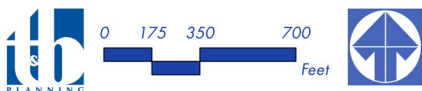
The Project entails the first amendment to the Renaissance Ranch Specific Plan No. 333 (SP 333A1). As depicted on Figure 3-2, *Specific Plan No. 333A1 Proposed Land Use Plan*, and summarized on Table 3-1, *SP 333A1 Proposed Land Uses*, proposed SP 333A1 would allow for “Business Park (BP)” land uses on 18.0 acres, “Light Industrial (LI)” land uses on 97.2 acres, “Open Space – Conservation (OS-C)” land uses on 11.5 acres, “Open Space – Conservation Habitat (OS-CH)” land uses on 27.1 acres, and major circulation facilities on 3.3 acres. As proposed by SP 333A1, areas designated for “Light Industrial” and “Business Park” uses may be developed with a Floor Area Ratio (FAR) up to 0.50. Accordingly, approval of SP 333A1 would allow for the future development of up to 392,040 s.f. of “Business Park” building area and up to 2,117,016 s.f. of “Light Industrial” building area.

Business Park land uses are proposed in Planning Area 1 of proposed SP 333A1. Business Park land uses would include small-scale light industrial, incubator industrial, merchant wholesalers, professional services, hospitality, professional office, small-scale warehousing/ storage, and research and development uses. For purposes of analysis within this EIR, Business Park building area is assumed to consist of approximately 60% “Industrial Park” uses and 40% “Warehouse” uses. Thus, for purposes of evaluation herein, it is assumed that Planning Area 1 of proposed SP 333A1 would include 156,816 s.f. of “Warehouse” building area and 235,224 s.f. of “Industrial Park” building area.



Source(s): ESRI, Nearmap (2021), KWC Engineering (2020)

Figure 3-2



Specific Plan No. 333A1 Proposed Land Use Plan



Table 3-1 SP 333A1 Proposed Land Uses

Planning Area	Land Use Designation	Acres	Maximum Building Square Footage	Anticipated Use Types and Building Area ¹
1	Business Park (BP)	18.0	392,040 s.f.	Warehousing: 156,816 s.f. Industrial Park: 235,224 s.f.
2	Light Industrial (LI)	97.2	2,117,016 s.f.	High-Cube Cold Storage: 423,403 s.f. High-Cube Fulfillment: 740,956 s.f. High-Cube Warehouse: 740,956 s.f. Manufacturing: 211,702 s.f.
Development Subtotal:		115.2	2,509,056 s.f.	2,509,056 s.f.
3	Open Space – Conservation (OS-C)	6.1	--	Open Space
4	Open Space – Conservation (OS-C)	5.4	--	Open Space
Open Space – Conservation Subtotal:		11.5	--	--
5	Open Space – Conservation Habitat (OS-CH)	1.8	--	Open Space Habitat
6	Open Space – Conservation Habitat (OS-CH)	25.3	--	Open Space Habitat
Open Space – Conservation Habitat Subtotal:		27.1	--	--
--	Circulation	3.3	--	Major Circulation
Project Total:		157.1	2,509,056 s.f.	2,509,056 s.f.

1. Totals reflect rounding.

Light Industrial land uses are proposed in Planning Area 2 of proposed SP 333A1. The proposed Light Industrial buildings are anticipated to accommodate uses such as industrial incubators, light manufacturing, parcel hub, warehouse/storage, fulfillment center, and e-commerce operations. For purposes of analysis within this EIR, Light Industrial building area is assumed to consist of approximately 20% “High-Cube Cold Storage” uses, 35% “High-Cube Fulfillment Center” uses, 35% “High Cube Warehouse” uses, and 10% “Manufacturing” uses. Thus, for purposes of evaluation herein, it is assumed that Planning Area 2 of proposed SP 333A1 would include 423,403 s.f. of “High-Cube Cold Storage” building area, 740,956 s.f. of “High-Cube Fulfillment Center” building area, 740,956 s.f. of “High-Cube Warehouse” building area, and 211,702 s.f. of “Manufacturing” building area.

Open Space – Conservation land uses are proposed in Planning Areas 3 and 4 of proposed SP 333A1 on 11.5 acres along the western and southern boundaries to provide a minimum 75-foot-wide landscape buffer between the Light Industrial land uses within Planning Area 2 and the off-site residential neighborhoods to the west and south. The minimum 75-foot-wide landscape buffer would provide landscaping, manufactured slopes, physical and visual buffering, and screening. The ultimate alignment of Street ‘A’ within Planning Area 2 would be determined with implementing project(s) and may encroach into Planning Areas 3 and 4 provided that the landscape buffers in Planning Areas 3 and 4 maintain a width of at least 75 feet.

Open Space – Conservation Habitat land uses are proposed in Planning Areas 5 and 6 of proposed SP 333A1 on approximately 27.1 acres. These areas are intended to be preserved as natural open space and conveyed to the Western Riverside County Regional Conservation Authority (RCA) to be included in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) reserve.

Proposed SP 333A1 also includes land use and development standards to facilitate implementation of intended development. These development standards would limit the development intensity within the proposed Light



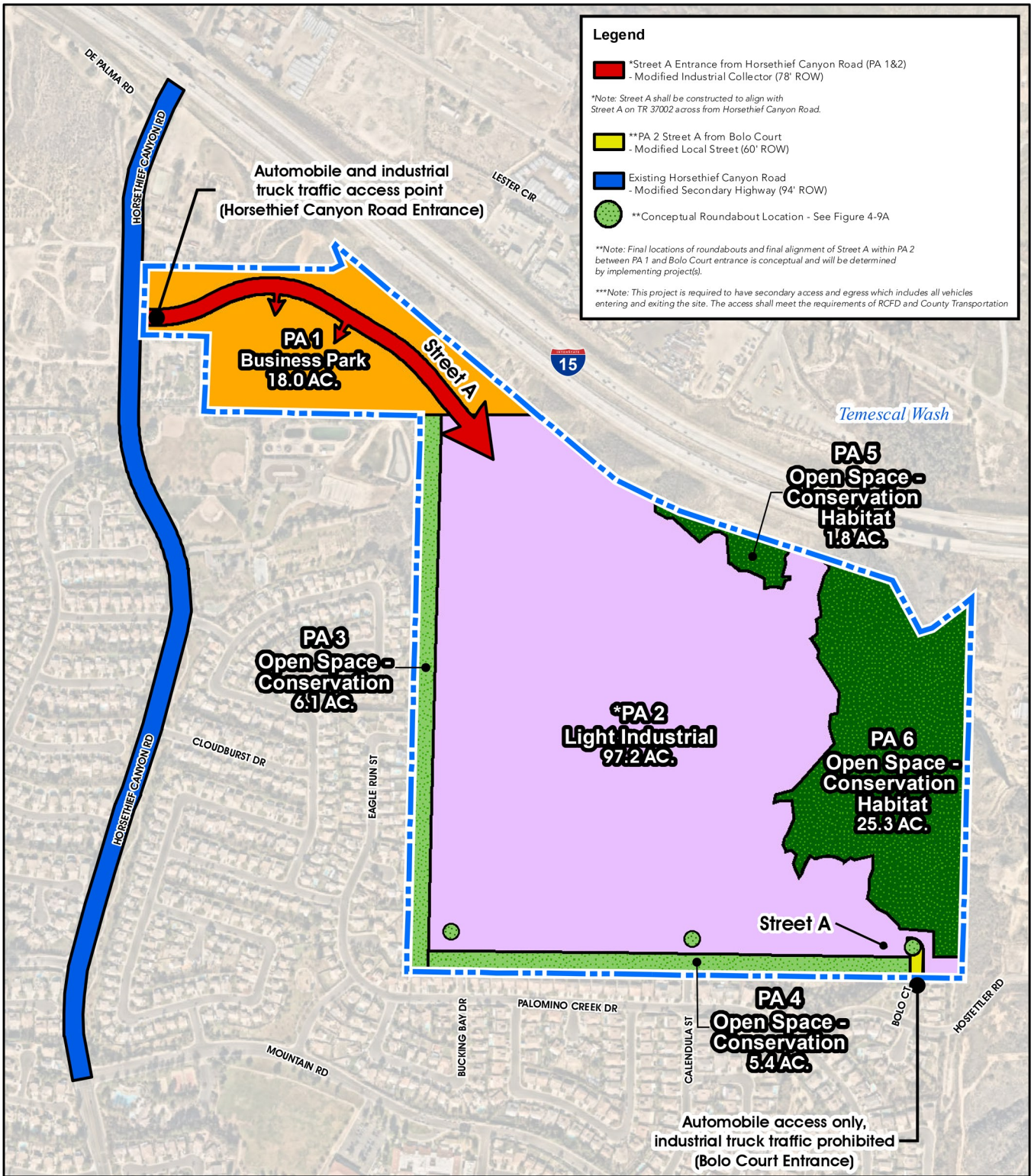
Industrial and Business Park areas to a maximum FAR of 0.5, as noted above. The proposed land use and development standards also notes that additional CEQA compliance shall be conducted for future implementing development on site in order to evaluate site-specific components of implementing development applications and to verify or refine the mitigation requirements specified by this EIR; requires design plans for common areas, specifying location and extent of landscaping, irrigation system, structures, and circulation; requires measures for security and safety; requires a Master Sign Program as part of future implementing developments; includes standards for ownership and maintenance; and identifies applicable State law, County ordinances, and other agency requirements for future implementing developments.

B. Proposed Circulation Plan

Regional access to the Project site would be provided via I-15 from the Lake Street exit located approximately 1.9 miles to the southeast, and from the Indian Truck Trail exit located approximately 2.8 miles to the northwest. Local access to the proposed Project would be provided via existing Horsethief Canyon Road and De Palma Road from the north, and via existing Bolo Court from the south.

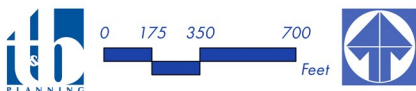
Proposed SP 333A1 includes a circulation plan, which is depicted on Figure 3-3, *Proposed Circulation Plan*. Proposed cross-sections are depicted on Figure 3-4, *Roadway Cross-Sections*. As shown, access within the Project site would be provided by proposed Street A. Truck traffic associated with the Project would be restricted to the main entrance into the site from Horsethief Canyon Road, while employee/passenger vehicle traffic would be allowed both at the entrance from Horsethief Canyon Road in the northwestern portion of the Project site, and from Bolo Court in the southeast portion of the Project site. Based on these considerations, two separate cross-sections are proposed for Street A and are described below.

- **Street A Entrance from Horsethief Canyon Road.** This segment of Street A would extend into the Project site from Horsethief Canyon Road and would serve both passenger vehicle and truck traffic. This segment is proposed as a “Modified Industrial Collector” with a total Right-of-Way (ROW) of 81 feet. This portion of Street A would consist of a public roadway and would include 56 feet of travel lanes, an 11-foot parkway along one side of the road with a six-foot-wide curb-adjacent sidewalk, and a 14-foot-wide parkway along the other side of the roadway that includes a curb-separated eight-foot-wide community trail.
- **Street A Entrance from Bolo Court.** This segment of Street A would extend from the northern terminus of Bolo Court and would provide passenger vehicle access into proposed Planning Area 2. This segment is proposed as a “Modified Local Street” with a total ROW of 64 feet. A total of 40 feet of travel lanes are proposed, with a 10-foot landscaped parkway along one side of the roadway that includes a six-foot-wide curb-adjacent sidewalk, and a 14-foot-wide parkway along the other side of the roadway that includes an eight-foot-wide community trail.

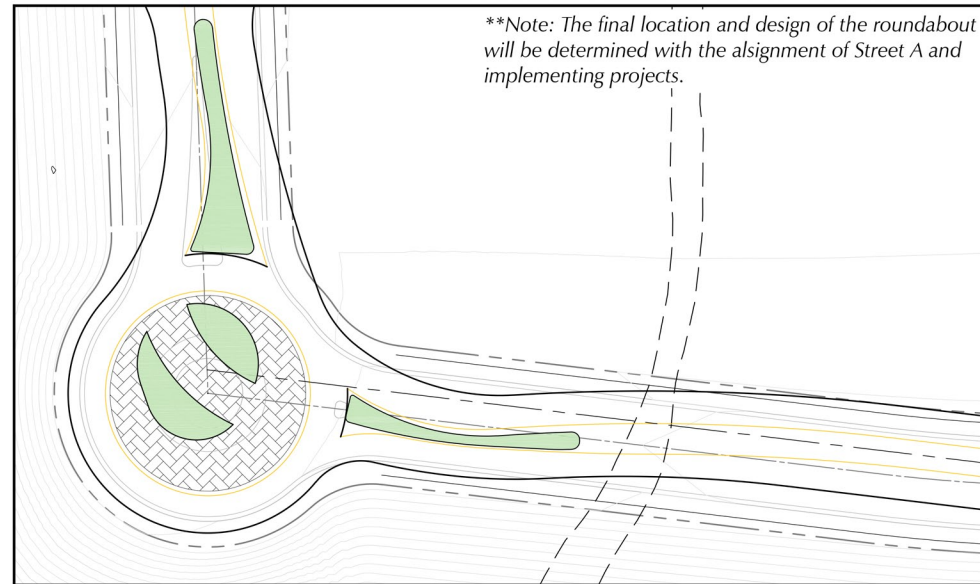


Source(s): ESRI, Nearmap (2022), KWC Engineering (2020)

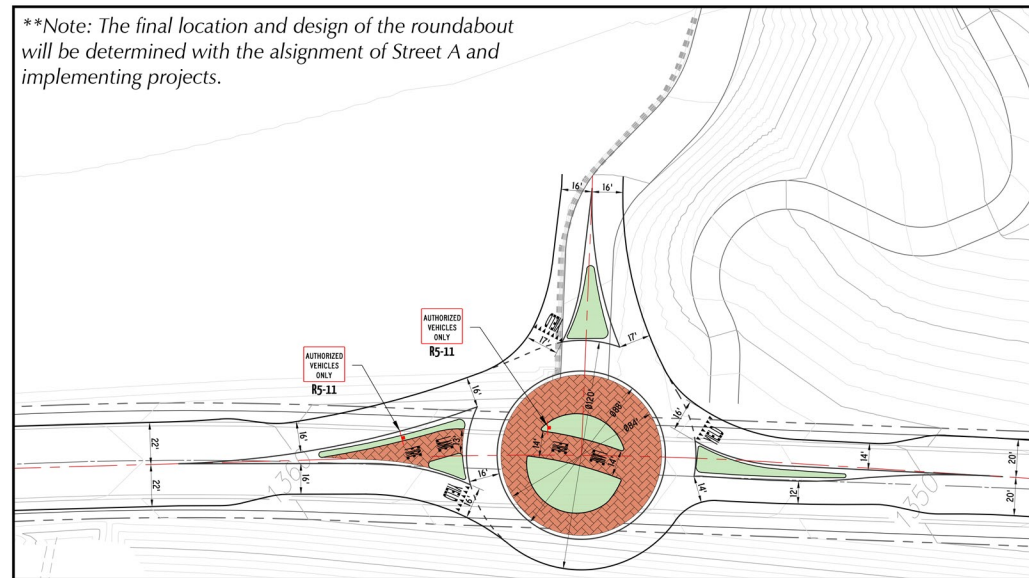
Figure 3-3



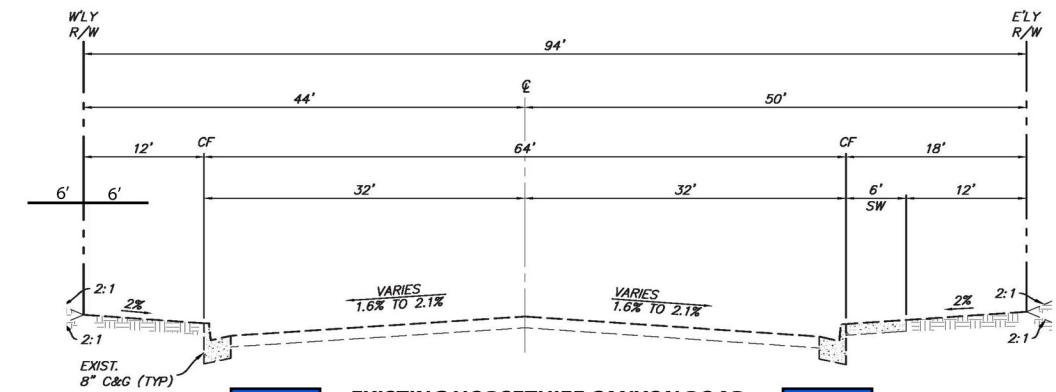
Proposed Circulation Plan



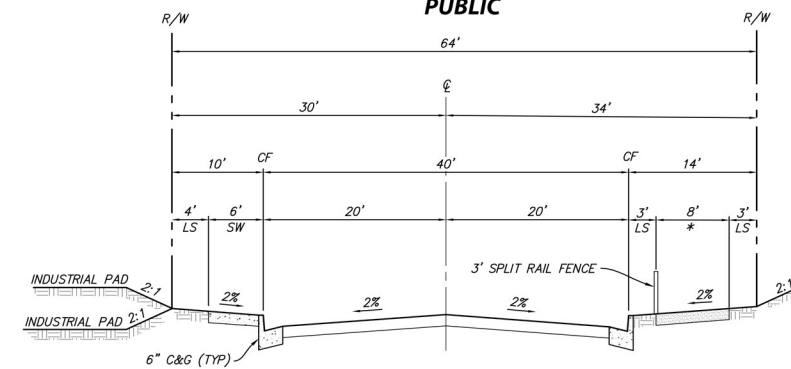
CONCEPTUAL ROUNDABOUT (1 of 2)



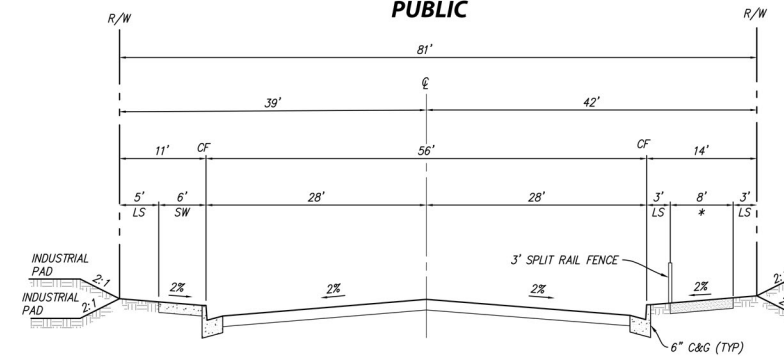
CONCEPTUAL ROUNDABOUT (2 of 2)



EXISTING HORSETHIEF CANYON ROAD
MODIFIED SECONDARY HIGHWAY (94' ROW)
PUBLIC



STREET A ENTRANCE
FROM BOLO COURT (WITHIN PA 2)
MODIFIED LOCAL STREET (60' ROW)
PUBLIC



STREET A ENTRANCE FROM
HORSETHIEF CANYON ROAD (WITHIN PA1 and PA 2)
MODIFIED INDUSTRIAL COLLECTOR (78' ROW)
PUBLIC

*Note: Community Trail to be provided on opposite side of roadway from Light Industrial (LI) uses within Planning Area 2.

Source(s): K&A Engineering (09-22-2020)

Figure 3-4



Horsethief Canyon Road is currently built out to its General Plan standard as a “Modified Secondary Highway,” with a total ROW of 94 feet. As such, no improvements to Horsethief Canyon Road are proposed as part of the Project. As shown on Figure 3-4, the existing Horsethief Canyon Road includes 64 feet of travel lanes. A 12-foot-wide landscaped parkway occurs along the west side of the roadway, and includes a six-foot-wide curb-adjacent sidewalk. An 18-foot-wide parkway occurs along the eastern side of the roadway, and also includes a six-foot-wide curb-adjacent sidewalk.

In addition, and as shown on Figure 3-5, *Roundabout Cross-Sections*, a roundabout is proposed in the southern portions of the Project site, which would help ensure that no truck traffic accesses the Project site from Bolo Court to the south. The precise location of the roundabout would be determined in the future with future implementing developments (i.e., plot plans).

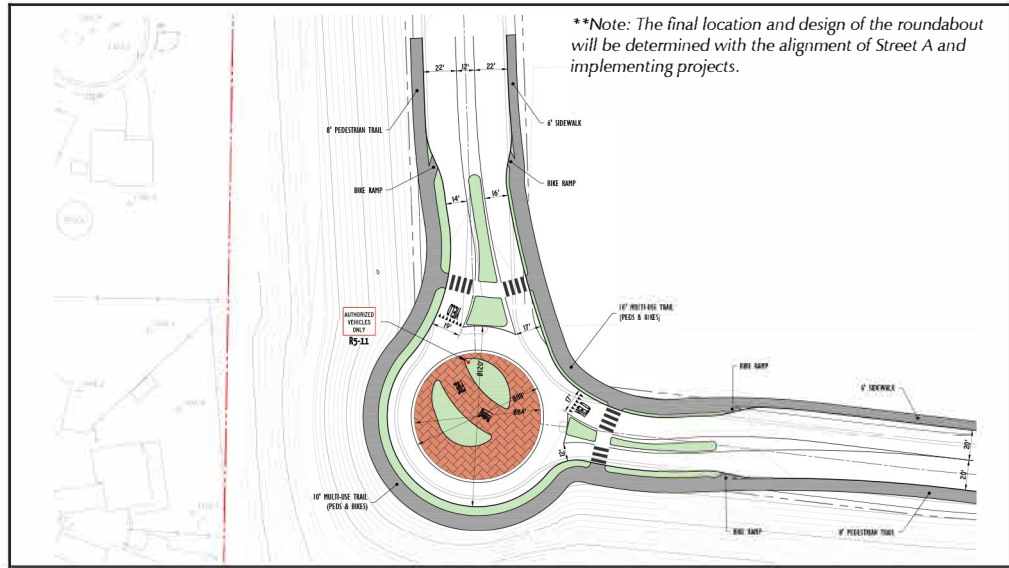
C. Non-Vehicular Circulation

Proposed SP 333A1 is intended to encourage pedestrian and bicycle circulation by employees and visitors between the Light Industrial and Business Park uses. Sidewalks are proposed in the public rights-of-way along Street A, connecting directly to the off-site sidewalk network and trail along Horsethief Canyon Road and sidewalk along Bolo Court. As shown on Figure 3-4, a 6-foot-wide curb-adjacent sidewalk is proposed along Street A, on the opposite side of the roadway from the Business Park and Light Industrial land uses, to allow pedestrians to walk alongside the open space in proposed Planning Areas 3 and 4. Additional pedestrian pathways and bike facilities may be designed for individual building sites at the time buildings are designed and positioned in Planning Areas 1 and 2 as part of future implementing project(s).

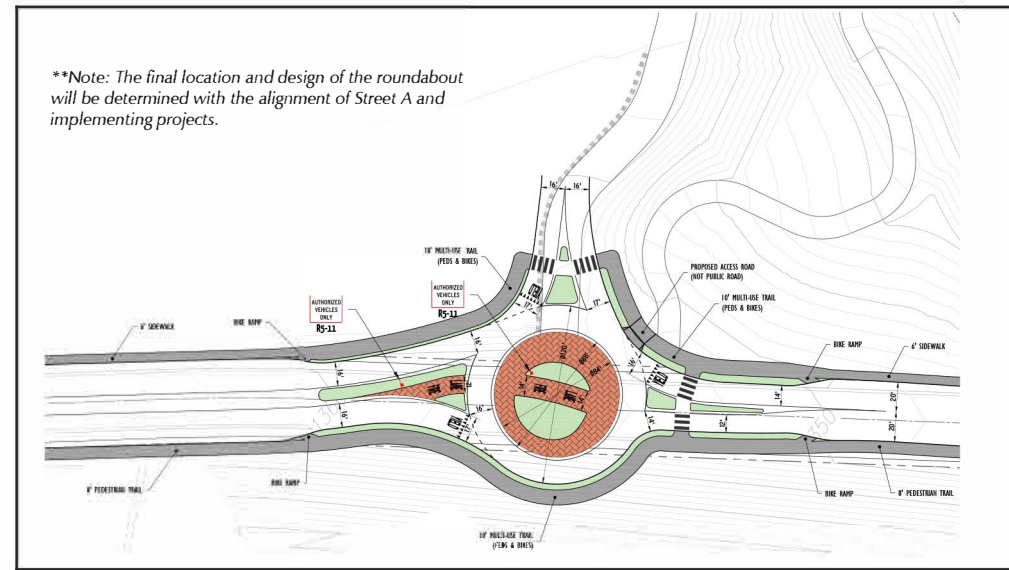
D. Drainage and Water Quality Improvements

The Project site is located within the Temescal Valley area of the Santa Ana River Watershed in the County of Riverside. According to mapping information from the Riverside County Flood Control and Water Conservation District (RCFCWCD), the Project site is not located within any Master Drainage Plan (MDPs), and there are no adopted MDPs in the surrounding area. As shown on Figure 3-6, *Conceptual Drainage and Water Quality Plan*, there are seven (7) existing culverts, along with the Temescal Wash undercrossing, which convey storm flows from the south side of the I-15 Freeway to the north side of the freeway. These existing culverts are owned and maintained by Caltrans. The Project has been designed to detain runoff generated on the Project site such that there would be no increase in developed storm flows as compared to existing drainage conditions. Several detention basins are proposed, and the primary peak flow detention basin would be located upstream of the Street “A” crossing of the existing wash as shown on Figure 3-6. The final locations of drainage and water quality facilities and basins would be determined when buildings are oriented and designed as part of future implementing projects (i.e., tract maps, plot plans, etc.).

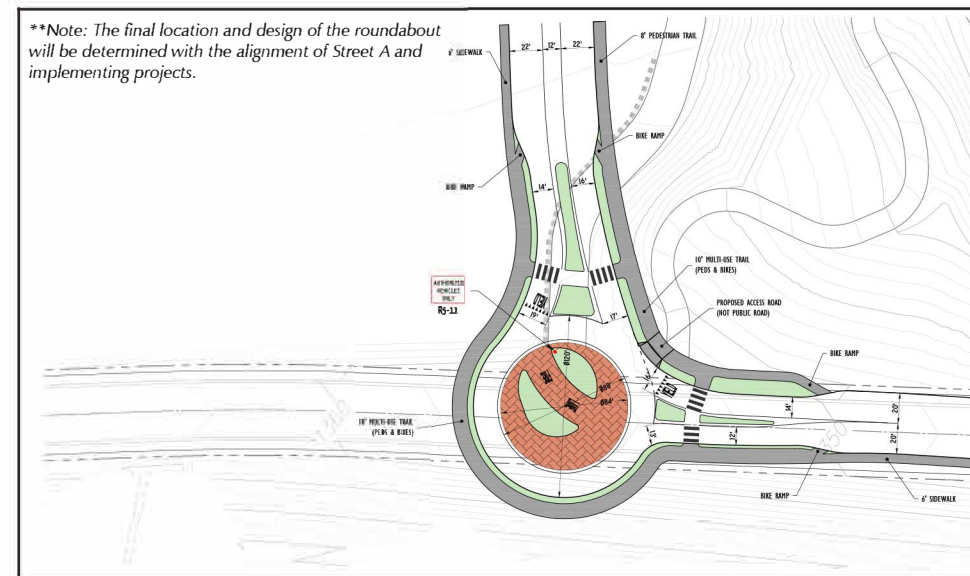
The proposed storm drain system includes the extension of the existing 66-inch Horsethief-Calendula storm drain from its current outlet, which is located approximately 100 feet south of the Project site boundary, to the southern boundary of the Specific Plan and then northerly approximately 450 feet where it would discharge directly into an existing wash. This facility would be maintained by the RCFCWCD. The proposed Primary



**CONCEPTUAL ROUNDABOUT (1 of 3)
STREET A ALONG PA 3 & 4**



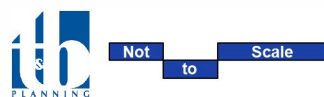
**CONCEPTUAL ROUNDABOUT (2 of 3)
STREET A ALONG PA 3 & 4**

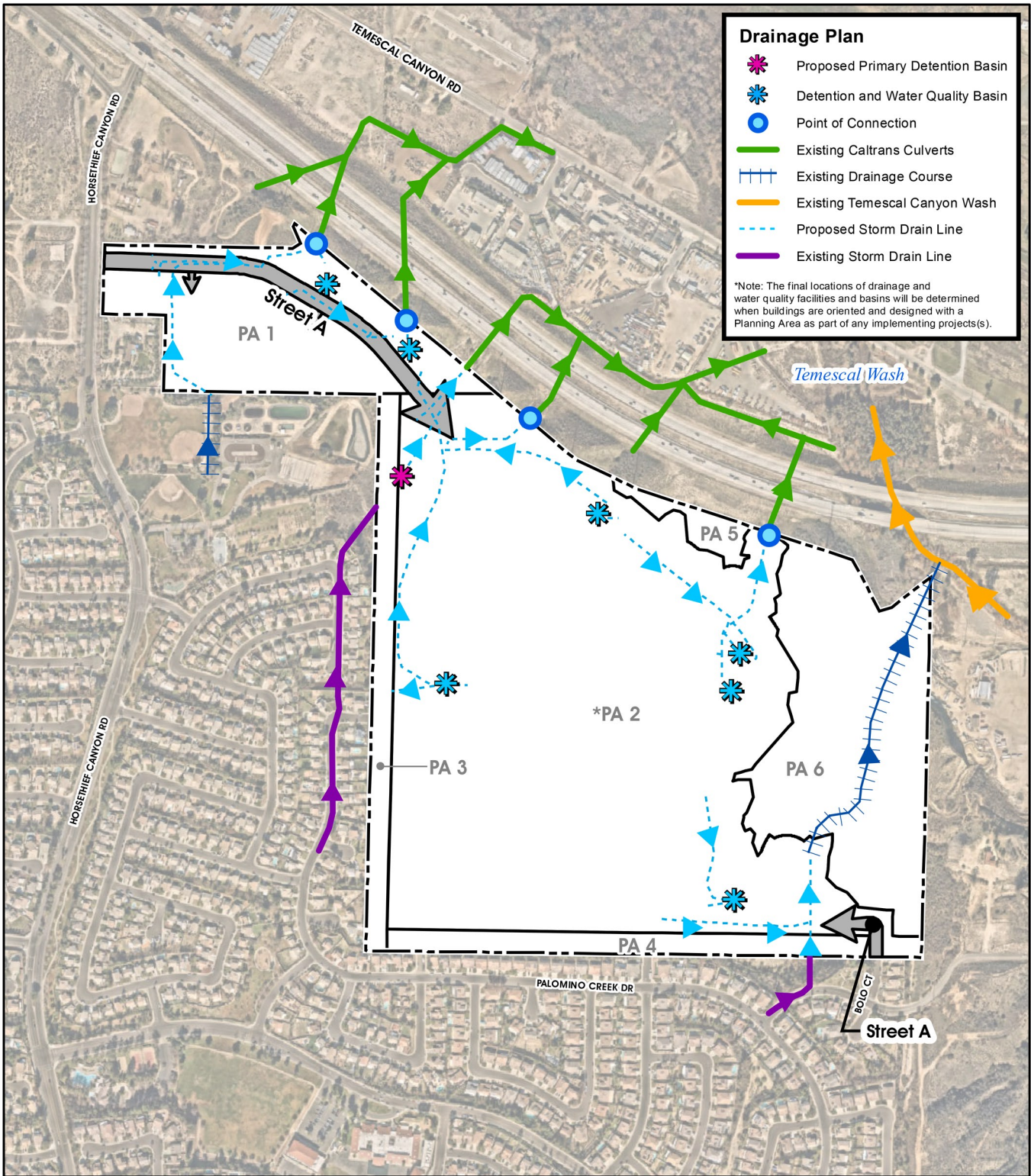


**CONCEPTUAL ROUNDABOUT (3 of 3)
STREET A ALONG PA 5 & 6**

Source(s): Urban Crossroads (02-09-2022)

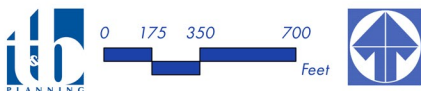
Figure 3-5





Source(s): ESRI, Nearmap (2022), Dexter Wilson Engineering (2020)

Figure 3-6



Conceptual Drainage and Water Quality Plan



Detention Basin, in the northwest portion of Planning Area 2, would mitigate most of the increased flows from the Project, while detention/water quality basins proposed throughout the remainder of Planning Areas 1 and 2 would mitigate the remainder of the increased flows (refer to Figure 3-6). The Primary Detention Basin and the two outlet storm drains to the Right-of-Way of Street A would be maintained by the Master Property Owners Association (POA). The portion of the Primary Detention Basin outlet pipes within the right of way of Street A would be maintained by the Riverside County Transportation Department (RCTD) with manholes at each end of the two storm drains within the Street A right of way to separate maintenance responsibilities between the County and the POA. That portion of the two outlet drains located downstream of Street A shall be maintained by the POA. The remaining detention/water quality basins throughout Planning Areas 1 and 2 would be maintained by the POA, except for facilities within the Right-of-Way of Street A, which instead would be maintained by RCTD.

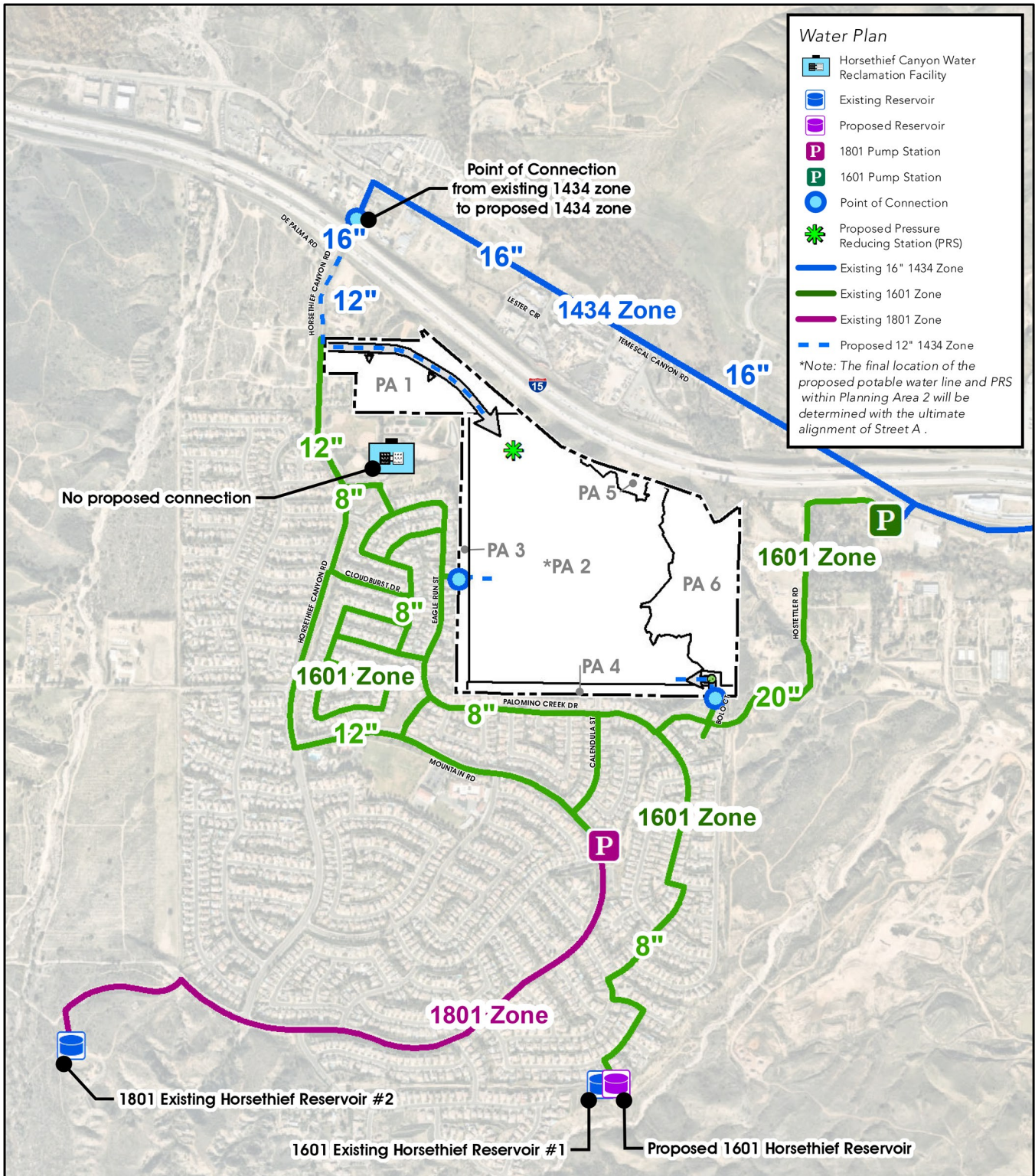
E. Water and Sewer Plans

1. Potable Water Plan

The Elsinore Valley Municipal Water District (EVMWD) would provide potable water service to the proposed Project. Water service would be provided via two (2) EVMWD Pressure Zones. As illustrated on Figure 3-7, *Conceptual Potable Water Plan*, the northern portion of the proposed Project would be served by the 1434 Pressure Zone, while the central and southern portions of the proposed Project would be served by the 1601 Pressure Zone. A Pressure Reducing Station (PRS) is proposed on site as part of the Project. This PRS would serve as a second point of connection for the 1434 Pressure Zone to provide the required redundancy. The alignment of the on-site potable water system, and the location of the Pressure Reducing Station, would be determined by the ultimate alignment of Street A.

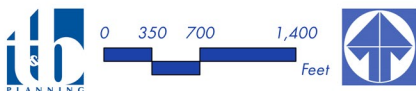
Potable water service from the 1434 Pressure Zone would be provided by a proposed off-site 12-inch water line in Horsethief Canyon Road from the Horsethief Canyon Road/Street A' intersection northerly to connect with the existing 16-inch 1434 Zone water line, located immediately north of the I-15 Freeway. The on-site 1434 Pressure Zone System would consist of a proposed 12-inch water line in Street A from Horsethief Canyon Road easterly to the PRS for the 1434/1601 Pressure Zone, the precise location of which would be determined with the ultimate alignment of Street A. The 1434 Pressure Zone has a surplus reservoir storage and no additional water storage would be required to serve the proposed Project.

Potable water service from the 1601 Pressure Zone would be provided by connections to the existing 1601 Pressure Zone system at two (2) locations: one (1) point of connection at Abbeywood Drive at the Project site's western boundary, one (1) point of connection at Bolo Court at the southeastern boundary of the Project site. An on-site looped system is proposed between these points of connections. The precise alignment of the on-site piping system would be determined with the ultimate alignment of Street A as part of future implementing developments (i.e., plot plans, etc.). The on-site 1601 Pressure Zone water system would connect to the 1434 Pressure Zone system at the future PRS location, the precise location of which would be determined with the ultimate alignment of Street A.



Source(s): ESRI, Nearmap (2022), Dexter Wilson Engineering (2020)

Figure 3-7



Conceptual Potable Water Plan



Under existing conditions, the reservoir storage for the existing 1601 Pressure Zone is not adequate to serve the proposed Project's water demands. An additional 1601 Pressure Zone reservoir is required within the existing 1601 Horsethief Pressure Zone reservoir site located approximately 0.7-mile to the south to meet existing deficiencies and serve the demands of the proposed Project and surrounding community. Accordingly, as part of the Project, a new 1.162-million-gallon (MG) water tank would be constructed adjacent to the existing 1.2 MG water tank near the southerly terminus of Kachina Court. The proposed water tank would occur on a fully disturbed property and within areas that are planned for development by the adopted SP 333.

2. Recycled Water Plan

Recycled water within the Project area is provided by the Horsethief Canyon Water Reclamation Facility (WRF), located off-site immediately west of the Project site. Under existing conditions, the Horsethief Canyon WRF is operating at capacity and is planned for expansion to meet the needs of the Project and other proposed development in the area.

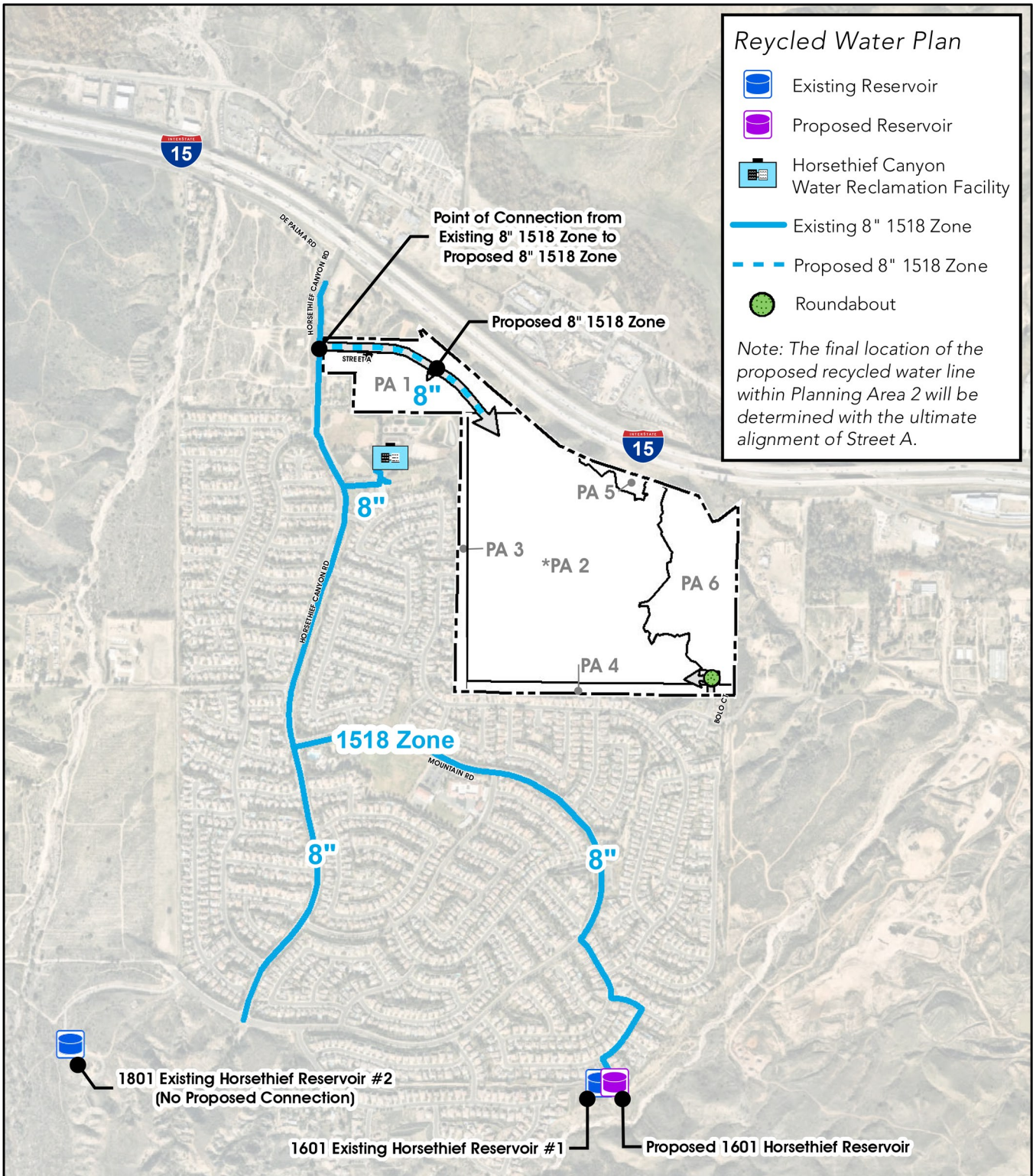
Recycled water from the Horsethief Canyon WRF is pumped to the 1518 Pressure Zone to serve the existing Horsethief Canyon Ranch community. The existing recycled water system includes an 8-inch 1518 Pressure Zone recycled water line in Horsethief Canyon Road along the frontage of the Project site, and runs southeasterly along Mountain Road to connect the existing Horsethief 1601 Pressure Zone reservoir (located approximately 0.7-mile south of the Specific Plan). The 1518 Pressure Zone in the area does not connect to the 1801 Pressure Zone Reservoir.

As illustrated on Figure 3-8, *Conceptual Recycled Water Plan*, the Project's proposed recycled water system would include an 8-inch 1518 Pressure Zone Water Line within Street A, and a point of connection to the existing 8-inch 1518 Pressure Zone recycled water line within Horsethief Canyon Road. The alignment of the on-site recycled water system would be determined by the ultimate alignment of Street 'A' during implementing project(s).

The final alignment and endpoint of the proposed 8-inch Recycled Water line within proposed Planning Area 2 of SP 333A1 would be determined by the locations of landscape connections and meters of implementing project(s). The 1518 Pressure Zone is capable of supplying recycled water to the irrigation point of connection, but private pumps downstream of the irrigation meter may be required to provide suitable pressure for the landscape irrigation design. The private pumps for the 1518 Pressure Zone would provide a static pressure of approximately 60 psi at the anticipated point of connection elevation and elevations slope up from there to the Specific Plan's southern boundary.

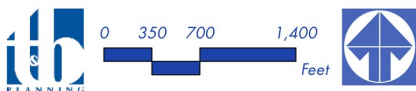
3. Sewer Plan

Wastewater treatment services in the Project area is provided by the EVMWD. All wastewater generated from the proposed Project would be conveyed to the Horsethief Canyon WRF for treatment and disposal, located off-site immediately to the west of the Project site. Under existing conditions, the Horsethief Canyon WRF is operating at, or near, its design capacity and plans are currently underway by EVWMD to expand the capacity of the Horsethief WRF to serve the surrounding area, including future development on the Project site.



Source(s): ESRI, Nemap (2022), Dexter Wilson Engineering (2020)

Figure 3-8



Conceptual Recycled Water Plan



Two options for providing sewer service to the Project site are proposed as part of the Project. As illustrated on Figure 3-9, *Conceptual Sewer Plan*, the “primary” sewer plan for the Project proposes to convey sewer flows within the Project site through a proposed 8-inch gravity sewer line within Street A. A sewer lift station is proposed at the southeastern corner of the Horsethief Canyon Road and Street A intersection to lift these flows to a proposed 6-inch sewer force main in Horsethief Canyon Road, which would then flow southerly to discharge into the existing gravity sewer system and Horsethief Canyon WRF. The existing sewer lift station within the Horsethief Canyon Park would be abandoned and replaced with the Project’s proposed on-site sewer lift station. The final location of the gravity sewer line within proposed Planning Area 2 of SP 333A1 would be determined by the ultimate alignment of Street A as part of future implementing developments (i.e., plot plans, etc.).

Depending on the timing of future implementing developments within proposed SP 333A1, and other planned developments in the area, a potential regional sewer lift station may be required approximately 0.5-mile northwest of the Project site, located west of the Horsethief Canyon Ranch Specific Plan (Specific Plan No. 152) boundary and south of De Palma Road. In the case that the potential regional sewer lift station is constructed and operational prior to development of the proposed Project, then the on-site proposed sewer lift station located at the southeastern corner of the Street ‘A’ and Horsethief Canyon Road intersection would not be required, and an on-site and off-site gravity sewer system would be constructed to discharge the Project’s sewage flows into the potential regional sewer lift station.

As illustrated on Figure 3-10, *Conceptual Sewer Plan (Alternative)*, as part of the alternative sewer plan gravity sewer lines ranging from 8 inches to 12 inches are proposed within Street ‘A’ to provide a sewer system from Bolo Court to Horsethief Canyon Road. The on-site sewer would convey flows northwesterly towards the off-site 12-inch gravity sewer line in Horsethief Canyon Road and the off-site 15-inch gravity sewer line in De Palma Road, and then would flow northwesterly in De Palma Road towards the potential regional lift station approximately 0.5-mile away from the Project site. Flows from the potential regional lift station would be lifted southeasterly in De Palma Road and then southerly in Horsethief Canyon Road to the existing Horsethief WRF.

F. Grading Plan

Development of the Project would involve constructing graded building pads for future proposed buildings within proposed Planning Areas 1 and 2 of SP 333A1, along with the construction of Street A, a peak flow mitigation basin, and water quality basins. Retaining/geo-grid walls are anticipated to be used across the site and these walls may range in height from 0 to 30 feet, and in some instances may exceed 50 feet in height. All walls would be designed and constructed in accordance with the California Building Code and the standards and requirements of the County of Riverside.

Figure 3-11, *Conceptual Grading Plan*, provides a conceptual illustration of one potential grading scenario for the creation of building pads and for the alignment for Street A to provide access to the proposed light industrial and business park land uses. The final grading would be determined in conjunction with future implementing projects (i.e., plot plans, etc.). While Figure 3-11 depicts one possible grading scenario for the Project, the

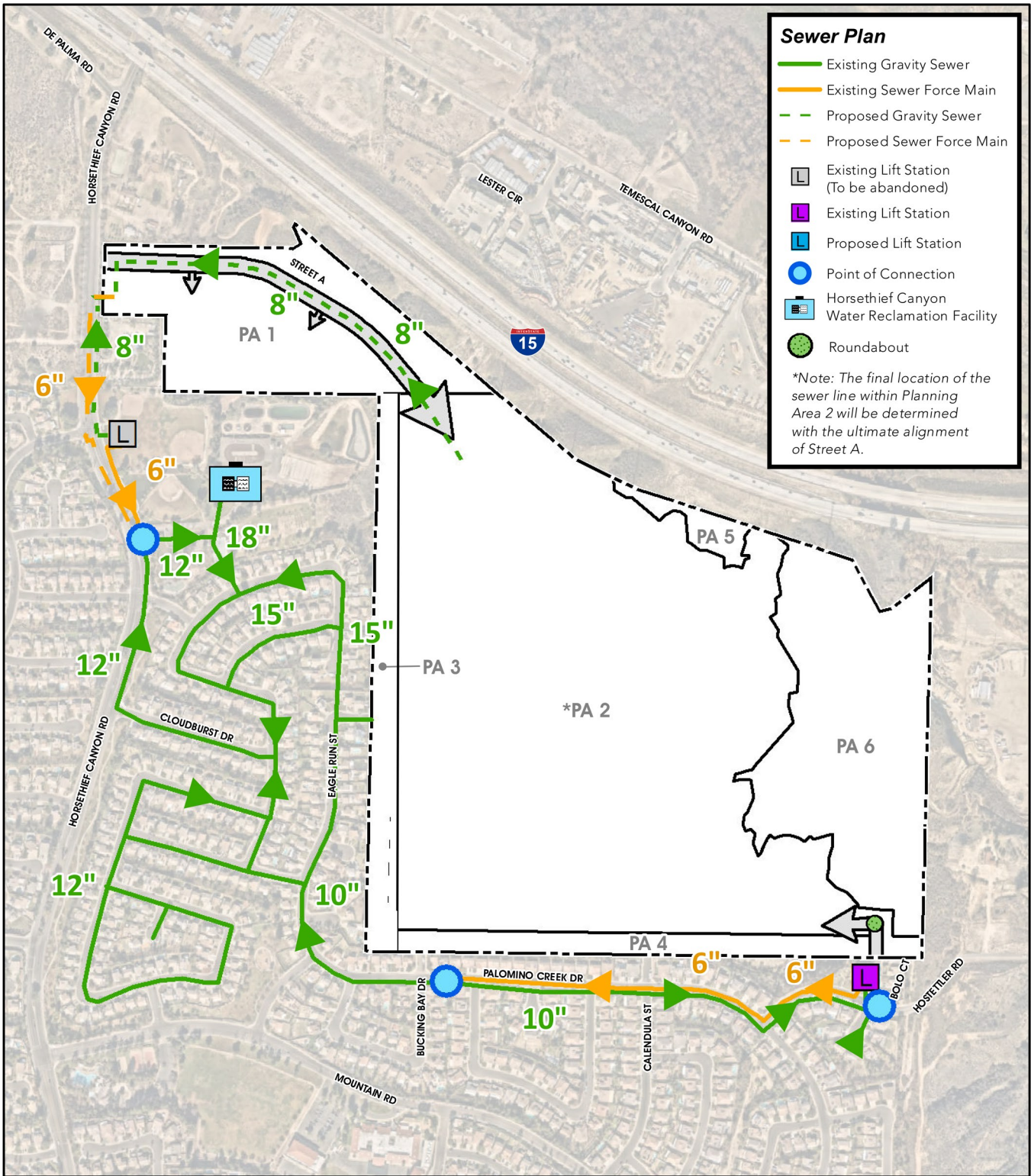
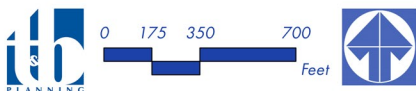
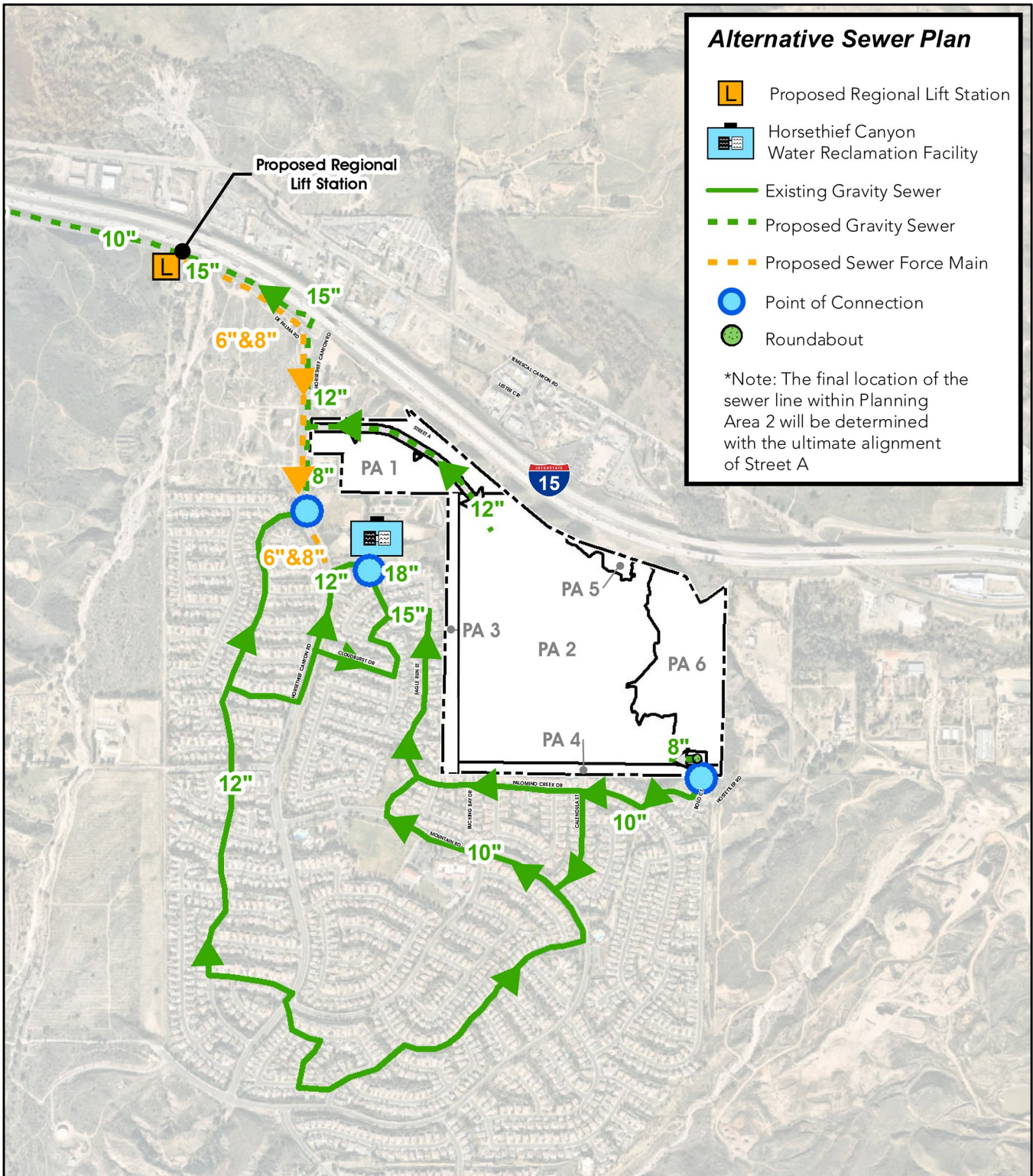


Figure 3-9

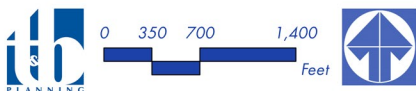


Conceptual Sewer Plan



Source(s): ESRI, Nearmap (2022), Dexter Wilson Engineering (2020)

Figure 3-10



Conceptual Sewer Plan (Alternative)

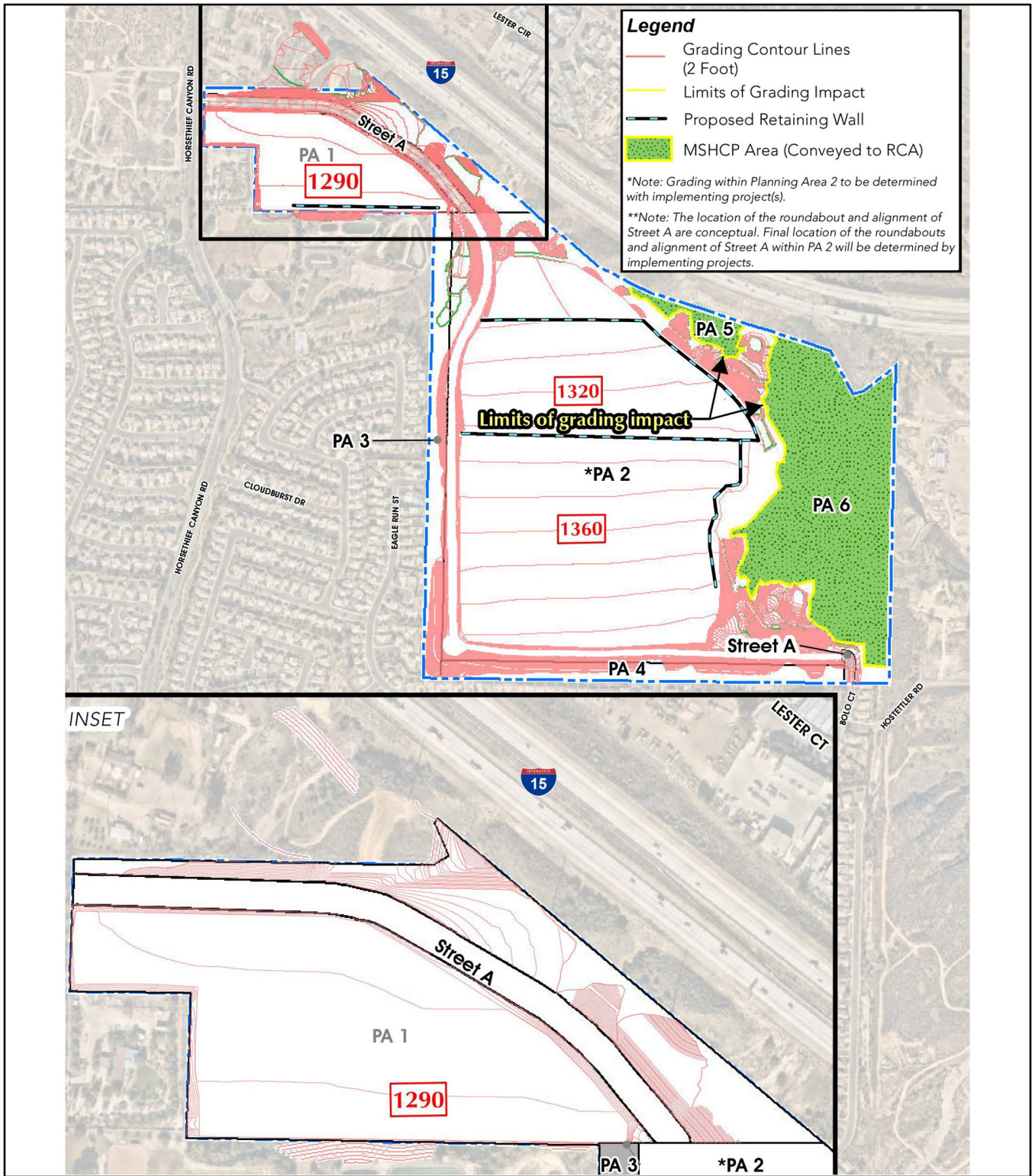


Figure 3-11



Not to Scale



Conceptual Grading Plan



estimated cut for this particular concept is approximately 1.8 million cubic yards with an additional estimated 500,000 cubic yards of remedial grading. It is anticipated that the Project's grading concept would result in balanced earthwork on-site without no need to export excess materials or to import materials from off-site areas.

Approximately 27.1 acres of open space land uses are located within proposed Planning Areas 5 and 6 of proposed SP 333A1. Pursuant to the Western Riverside County MSHCP, this area concentrated along the eastern and northeastern portions of the Specific Plan would be conveyed to the RCA as part of the MSHCP Reserve in order to maintain the on-site habitat in its natural condition. No grading or construction would be permitted within Planning Areas 5 and 6.

G. Proposed Renaissance Ranch Specific Plan Design Guidelines

Proposed SP 333A1 also includes Design Guidelines related to architecture, lighting, energy efficiency, signage, and landscape/hardscape design. The Design Guidelines are intended to allow for flexibility for future implementing developments while providing standards to help ensure the site is developed in a manner consistent with the development quality, character, and theme as described by SP 333A1. Future implementing developments would be reviewed by the County for compliance with the Design Guidelines section of SP 333A1. Refer to Chapter 4 of proposed SP 333A1 for the specific design standards that would apply to future development.

3.6 PROJECT CONSTRUCTION AND OPERATIONAL CHARACTERISTICS

3.6.1 CONSTRUCTION DETAILS

A. Proposed Physical Disturbance

For purposes of analysis throughout this EIR, it is assumed that implementation of the Project would result in physical disturbance to all portions of the Project site that are planned for development with "Light Industrial (LI)" and "Business Park (BP)" land uses by proposed SP 333A1. The Project also would result in full disturbance to areas proposed to be designated for "Open Space – Conservation (OS-C)" within proposed Planning Areas 3 and 4 of proposed SP 333A1. No grading or disturbances are proposed within proposed Planning Areas 5 and 6 of SP 333A1, which are proposed to be designated for "Open Space – Conservation Habitat (OS-CH)" land uses. In addition, and as previously depicted on Figure 3-11, limited areas of off-site grading would be required to the north and south of proposed Planning Area 1 of SP 333A1 to allow for future grading of development pads on site and to facilitate site drainage.

Areas planned for physical disturbances off-site would be limited to improvements associated with the Project's proposed water and sewer improvements, as previously depicted on Figure 3-6 through Figure 3-9 and as described above in subsection 3.5.3.0. These improvements include the construction of a 12-inch water line within Horsethief Canyon Road between the northwest corner of the Project site to the existing point of connection located north of I-15, and the construction of a 1.162 MG water tank near the southerly terminus of Kachina Court.



In addition, and as previously depicted on Figure 3-9, under the primary sewer plan, an 8-inch sewer line and 6-inch force main are proposed within the alignment of Horsethief Canyon Road between the northwest corner of the Project site and the existing point of connection located near the intersection with Shotgun Trail Road. Under the primary sewer plan, a lift station is proposed within the northwestern corner of Horsethief Canyon Park. As previously depicted on Figure 3-10, under the alternative sewer plan, a regional lift station would be constructed approximately 0.4-mile northwest of the Project site, along the southern alignment of De Palma Road and I-15. Under the alternative sewer plan, sewer mains ranging from 8 to 15 inches in diameter are proposed within Horsethief Canyon Road between Colt Drive and De Palma Road, and within De Palma Road between Horsethief Canyon Road and the proposed regional lift station. A force main ranging from 6 to 8 inches in diameter is proposed under the alternative sewer plan within De Palma Road and Horsethief Canyon Road between the proposed regional lift station and the existing Horsethief WRF.

B. Timing of Construction Activities

For purposes of analysis throughout this EIR, it is assumed that construction activities would commence as early as summer 2021, and would be completed by 2025. Although it is likely that construction activities would not commence as early as summer 2021, the assumption that construction activities would commence as early as summer 2021 provides a “worst case” assessment of potential construction-related impacts since air quality emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.¹ Although it is anticipated that the Project would be phased, no phasing plan is currently proposed. Buildout of the Project would occur based on market conditions at the time of implementation.

3.6.2 OPERATIONAL CHARACTERISTICS

At the time this EIR was prepared, the future tenants of future buildings on site were unknown. For purposes of evaluation in this EIR, the Project is assumed to be operational 24 hours per day, seven days per week, with exterior loading and parking areas illuminated at night. Lighting would be subject to compliance with County of Riverside Ordinance Nos. 655 and 915. Ordinance No. 655 would require the use of low-pressure sodium lamps and the shielding of all nonexempt outdoor lighting fixtures. Ordinance No. 915 requires that all outdoor luminaires shall be located, adequately shielded, and directed such that no direct light falls outside the Project boundaries or onto the public right-of-way.

A. Employment

Because the users of the Project’s buildings are not yet known, the number of jobs that the Project would generate cannot be precisely determined. Appendix E-1 to the Riverside County General Plan provides an estimate of the number of employees typically associated with various proposed land use types. However, it should be noted that the employment factors specified in Appendix E-1 do not account for the increasing automation of the industrial sector. As noted by the Southern California Association of Governments (SCAG)

¹ As shown in the CalEEMod User’s Guide Version 2016.3.2, Section 4.3 “OFFROAD Equipment” as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.



in the draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (“Connect SoCal”), “[w]arehouses are increasingly integrating automation to improve operational efficiencies in responding to the dramatic surge in direct-to-consumer e-commerce. Additionally, continued developments and demonstrations of automated truck technologies will alter the goods movement environment with far-reaching impacts ranging from employment to highway safety.” SCAG further notes that “as automation is adopted more holistically throughout supply chains, the region faces serious challenges for those whose jobs may be changed or eliminated as a result.” (SCAG, 2020, Goods Movement Appendix, p. 2) Notwithstanding, Table 3-2, *Estimated Employment*, provides a conservative estimate of the number of employees anticipated with the Project, based on the rates identified in Appendix E-1 to the County’s General Plan. As shown, buildout of the Project is estimated to result in up to 2,436 employees. While it is acknowledged that the number of jobs that would be created by the Project may be less than shown in Table 3-2 due to automation within the industry, the Project nonetheless would result in the creation of a substantial number of jobs that would serve to assist Riverside County in improving its jobs-housing balance. (Riverside County, 2021a, Appendix E-1, Table E-5)

Table 3-2 Estimated Employment

Land Use Designation	Building Area	Building Area Per Employee	Estimated Employees
Business Park/Light Industrial	2,509,056 s.f.	1,030 s.f.	2,436
Totals:	2,509,056 s.f.	--	2,436

(Riverside County, 2021a, Appendix E-2, Table E-5)

B. Traffic

Based on the land use assumptions previously presented in Table 3-1, the Project is anticipated to generate approximately 5,422 vehicular trips per day (actual vehicles), including 449 trips during the a.m. peak hour and 514 trips during the p.m. peak hour. A total of 1,044 truck trips (actual vehicles) are anticipated to be generated by the Project. In addition, in terms of Passenger Car Equivalent (PCE)², the Project would generate 6,974 vehicle trips per day, including 548 trips during the a.m. peak hour and 608 trips during the p.m. peak hour. In terms of PCEs, the Project would generate approximately 2,596 daily trips associated with trucks. Refer to the Project’s Traffic Analysis (EIR *Technical Appendix L2*) for a discussion of trip generation, trip distribution, and trip assignment associated with Project traffic. (Urban Crossroads, 2022a, Tables 4-2 and 4-3) In addition, there is a potential that the Project’s southern access from Bolo Court may be restricted to emergency access only. In such a case, 100% of the Project’s passenger vehicle traffic would utilize Street A to access Horsethief Canyon Road. Refer to the Project’s Focused Traffic Analysis (EIR *Technical Appendix L4*) for a discussion of trip distribution and assignment in the event that no passenger vehicle access is allowed via Bolo Court. (Urban Crossroads, 2022b)

² PCEs allow the typical “real-world” mix of vehicle types to be represented as a single, standardized unit, such as the passenger car, to be used for the purposes of capacity and level of service analyses.



C. Water Demand

Based on information provided in the Project’s Water Supply Assessment (“WSA”; *Technical Appendix M*), and as summarized in Table 3-3, Project Water Demands, the proposed Project is anticipated to generate a demand for approximately 109,080 gallons per day (gpd), or approximately 122 acre-feet per year (AFY). (EVMWD, 2021b, pp. ES-1 and ES-2)

Table 3-3 Project Water Demands

LAND USE DESIGNATION	ACRES	2016 WATER MASTER PLAN	EXPECTED AVERAGE DAY DEMAND (GPD)	ANNUAL AVERAGE DEMAND (AFY)
		WATER DUTY FACTOR (GPD/ACRE)		
Business Park	18.0	1,200	21,600	24
Light Industrial	97.2	900	87,480	98
DEVELOPMENT TOTAL	115.2		109,080	122

(EVMWD, 2021b, Table ES-1)

D. Wastewater Generation

Based on Table 5.5-AF, *Cumulative Effect on Theoretical Wastewater Treatment Demand*, of the EIR prepared for Riverside County General Plan Amendment No. 960 (herein, EIR No. 521), Table 3-4, *Estimated Wastewater Generation*, provides an estimate of the amount of wastewater that would be generated by the Project. As shown, the Project is anticipated to generate approximately 172,800 gallons per day (gpd) of wastewater requiring treatment. (Riverside County, 2021a, Table 5.5-AF)

Table 3-4 Estimated Wastewater Generation

Land Use	Acreage	Wastewater Generation Factors	Total Wastewater Generation
Business Park	18.0 acres	1,500 gpd/acre	27,000 gpd
Light Industrial	97.2 acers	1,500 gpd/acre	145,800 gpd
Totals	115.2 acres	--	172,800 gpd

(Riverside County, 2021a, Table 5.5-AF)

3.7 SUMMARY OF REQUESTED ACTIONS

The County of Riverside has primary approval responsibility for the proposed Project. As such, the County serves as the Lead Agency for this EIR pursuant to State CEQA Guidelines § 15050. The role of the Lead Agency was previously described in detail in Section 1.0 of this EIR. As part of the approval process for the proposed Project, the County’s Planning Commission will hold a public hearing to consider the Program EIR, the Project’s General Plan Amendment (GPA 200004), Amendment No. 1 to Specific Plan No. 333 (SP 333A1), and Change of Zone (CZ 2000016). The Planning Commission will make advisory recommendations to the Board of Supervisors on whether to approve, approve with changes, or deny GPA 200004, SP 333A1,



and CZ 2000016, and whether to certify this Program EIR. A public hearing would then be held before the Board of Supervisors, which will consider the information contained in the Project's EIR and the EIR's Administrative Record in its decision-making processes and will approve, approve with changes, or deny proposed GPA 200004, SP 333A1, and CZ 2000016.

3.8 RELATED ENVIRONMENTAL REVIEW AND CONSULTATION REQUIREMENTS

Subsequent to approval of GPA 200004, SP 333A1, and CZ 2000016, additional discretionary applications would be required to implement the Project. Specifically, Tentative Tract Maps (TTMs) would be required to subdivide the 157.1-acre Project site in a manner that corresponds to the planning area boundaries proposed as part of SP 333A1 and/or to subdivide individual planning areas for ownership purposes. Additionally, Plot Plans would be required for development within the Light Industrial and Business Park portions of the Project, while Conditional Use Permits (CUPs) also may be required for certain types of uses. Riverside County would review future applications for TTMs, Plot Plans, and CUPs for consistency with the General Plan, EAP, SP 333A1, and the adopted zoning ordinance for the site. Additionally, the County would be required to conduct additional CEQA review for the future implementing TTMs, plot plans, and/or CUPs, and would evaluate whether the implementing discretionary action(s) meet the conditions of State CEQA Guidelines §§ 15162 and 15163 requiring preparation of a Subsequent or Supplemental EIR. If the implementing discretionary action(s) do not meet the conditions of State CEQA Guidelines §§ 15162 or 15163, then an Addendum to this Program EIR may be prepared in accordance with State CEQA Guidelines § 15164.

Following approval of implementing discretionary actions, ministerial actions also would be necessary to implement the proposed Project. These include, but are not limited to, grading permits, building permits, encroachment permits/road improvements, drainage infrastructure improvements, water and sewer infrastructure improvements, stormwater permit(s) (NPDES), and State and federal resource agency permits. Table 3-5, *Matrix of Project Approvals/Permits*, provides a summary of the agencies responsible for subsequent discretionary approvals associated with the Project. This EIR covers all federal, State, and local government approvals which may be needed to construct or implement the Project, whether explicitly noted in Table 3-5, or not [State CEQA Guidelines §15124(d)].



Table 3-5 Matrix of Project Approvals/Permits

Public Agency	Approvals and Decisions
County of Riverside	
Proposed Project – Riverside County Discretionary Approvals	
Riverside County Planning Commission	<ul style="list-style-type: none"> • Provide recommendations to the Riverside County Board of Supervisors whether to approve Amendment No. 1 to the Renaissance Ranch Specific Plan No. 333, General Plan Amendment No. 200004, and Change of Zone No. 2000016. • Provide recommendations to the Riverside County Board of Supervisors regarding certification of this Program EIR.
Riverside County Board of Supervisors	<ul style="list-style-type: none"> • Approve, conditionally approve, or deny Amendment No. 1 to the Renaissance Ranch Specific Plan No. 333. • Approve or deny General Plan Amendment No. 200004. • Approve or deny Change of Zone No. 2000016. • Reject or certify this Program EIR along with appropriate CEQA Findings.
Subsequent Riverside County Discretionary and Ministerial Approvals	
Riverside County Subsequent Implementing Approvals: Planning Department and/or Building & Safety	<ul style="list-style-type: none"> • Approve implementing Tentative Tract Maps. • Approve implementing Plot Plans. • Approve implementing Conditional Use Permits. • Record Final Maps. • Issue Grading Permits. • Issue Building Permits. • Approve Road Improvement Plans. • Issue Encroachment Permits. • Issue Conditional Use Permits, if required.
Other Agencies – Subsequent Approvals and Permits	
Regional Water Quality Control Board	<ul style="list-style-type: none"> • Compliance with National Pollutant Discharge Elimination System (NPDES) Permit. Waste Discharge Requirements • Issuance of a Construction Activity General Construction Permit • Issuance of a revised/amended Section 401 Permit pursuant to the Clean Water Act (revisions limited to updated description of the proposed Project)
U.S. Army Corps of Engineers	<ul style="list-style-type: none"> • Issuance of revised/amended Section 404 Permit (revisions limited to updated description of the proposed Project)
California Department of Fish and Wildlife	<ul style="list-style-type: none"> • Issuance of revised/amended Section 1602 Streambed Alteration Agreement (revisions limited to updated description of the proposed Project)
Riverside County Flood Control and Water Conservation District (RCFCWCD)	<ul style="list-style-type: none"> • Approval of proposed drainage infrastructure
South Coast Air Quality Management District (SCAQMD)	<ul style="list-style-type: none"> • Permits and approvals associated with operation of stationary equipment, if proposed.
Elsinore Valley Municipal Water District (EVMWD)	<ul style="list-style-type: none"> • Approval of proposed water and sewer connections and improvements.



4.0 ENVIRONMENTAL ANALYSIS

4.0.1 SUMMARY OF EIR SCOPE

In accordance with State CEQA Guidelines §§ 15126-15126.4, this EIR Section 4.0, *Environmental Analysis*, provides analyses of potential direct, indirect, and cumulatively-considerable impacts that could occur from planning, constructing, and operating the proposed Project.

In compliance with the procedural requirements of CEQA, a Notice of Preparation (NOP) was prepared and distributed for public review, in accordance with State CEQA Guidelines § 15082 of the State CEQA Guidelines. An Initial Study was not prepared for the Project, and as such the NOP indicated that the required EIR will evaluate all of the topics listed in Appendix G to the State CEQA Guidelines, as implemented by Riverside County and the County’s standard Environmental Assessment (EA) Form. Public comment on the scope consisted of written comments received by the Riverside County in response to the NOP issued for this Program EIR. A publicly-noticed Scoping Session also was held as part of a Riverside County Planning Director’s Hearing on April 5, 2021 at the County of Riverside Administrative Building (4080 Lemon Street, Riverside, CA 92501). During the Scoping Session, there was only one commenter who expressed concerns regarding the proposed Project and its potential impacts to land use compatibility, aesthetics, transportation/traffic, property values, noise, and water rights. Pursuant to Appendix G to the State CEQA Guidelines and the County’s standard EA form, and in light of comments received during the NOP public review period and at the Project’s Scoping Session, this Program EIR evaluates 21 primary environmental subject areas, as listed below. Each Subsection evaluates several specific subject matters related to the general topic of the Subsection. The title of each Subsection is not limiting; therefore, refer to each subsection for a full account of the subject matters addressed therein.

- | | | | |
|------|------------------------------------|------|-------------------------------|
| 4.1 | Aesthetics | 4.12 | Mineral Resources |
| 4.2 | Agriculture and Forestry Resources | 4.13 | Noise |
| 4.3 | Air Quality | 4.14 | Paleontological Resources |
| 4.4 | Biological Resources | 4.15 | Population and Housing |
| 4.5 | Cultural Resources | 4.16 | Public Services |
| 4.6 | Energy | 4.17 | Recreation |
| 4.7 | Geology and Soils | 4.18 | Transportation |
| 4.8 | Greenhouse Gas Emissions | 4.19 | Tribal Cultural Resources |
| 4.9 | Hazards and Hazardous Materials | 4.20 | Utilities and Service Systems |
| 4.10 | Hydrology and Water Quality | 4.21 | Wildfire |
| 4.11 | Land Use and Planning | | |

4.0.2 SCOPE OF CUMULATIVE EFFECTS ANALYSIS

CEQA requires that an EIR contain an assessment of the cumulative impacts that may be associated with a proposed project. As noted in State CEQA Guidelines § 15130(a), “an EIR shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable.” “[A] cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together



with other projects creating related impacts” (State CEQA Guidelines §15130(a)(1)). As defined in State CEQA Guidelines § 15355:

‘Cumulative Impacts’ refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

(a) The individual effects may be changes resulting from a single project or a number of separate projects.

(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

State CEQA Guidelines § 15130(b) describes two acceptable methods for identifying a study area for purposes of conducting a cumulative impact analysis. These two approaches include: 1) a list of past, present, and probable future projects producing related or cumulative impacts, including if necessary, those projects outside the control of the agency [‘the list of projects approach’], or 2) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact (‘the summary of projections approach’).”

As a Program EIR, the analysis herein primarily relies upon the summary of projections approach because implementation of the proposed Project would require subsequent discretionary approvals from Riverside County (e.g., tentative tract maps, plot plans, etc.), and it is not possible to identify a list of cumulative developments that may be proposed in the future when implementing discretionary applications are filed with Riverside County. As such, the analysis herein considers impacts that would result from Project buildout on the existing (2021) environment, as well as long-term cumulatively-considerable impacts that may result from buildout of the Riverside County General Plan and the local general plans of cities within the Project vicinity.

Notwithstanding, and in order to provide a comprehensive analysis of potential near-term cumulatively-considerable impacts, the analyses of cumulatively-considerable traffic, air quality, greenhouse gas, and noise impacts are based on existing traffic conditions plus ambient growth and the manual addition of traffic from past, present, and reasonably foreseeable projects and includes approved and pending development projects in proximity to the Project site that would contribute traffic to the same transportation facilities as the Project, as well as large, traffic-intensive projects farther from the Project site that have the potential to affect regional transportation facilities. This methodology recognizes development projects that have the potential to contribute measurable traffic to the same intersections, roadway segments, and/or State highway system facilities as the proposed Project and have the potential to be made fully operational in the foreseeable future. As shown on Table 4.0-1, *Cumulative Development Land Use Summary*, and as depicted on Figure 4.0-1, *Cumulative Development Projects Location Map*, the near-term cumulative impact analysis of traffic impacts, as well as the near-term cumulative impact analysis of air quality, greenhouse gases, and noise, includes 34 other past, present, and reasonably foreseeable projects within this study area in addition to ambient growth.



Table 4.0-1 Cumulative Development Land Use Summary

#	Name	Land Use	Intensity	
County of Riverside				
1	CUP03481	Shopping Center	480.000	TSF
2	PP25776	Church	73.600	TSF
		Private School	216	STU
		Pre-School	96	STU
3	TTM No. 36316	Single Family Residential	87	DU
	TTM No. 36317	Single Family Residential	194	DU
		Passive Park	14.5	AC
		Passive Park	3.9	AC
4	Specific Plan No. 00374 (TTM No. 34476) ²	Fast Food w/ Drive Thru	3.500	TSF
		Business Park	476.150	TSF
		High Turnover Restaurant	13.460	TSF
		Daycare Center	10.000	TSF
		Hotel	320	ROOMS
		Shopping Center	117.740	TSF
		General Office	103.300	TSF
	Mini-Warehouse	381	UNITS	
5	TR 35249	SFDR	53	DU
6	Temescal Canyon	SFDR	93	DU
7	Specific Plan No. 00353 (Serrano Specific Plan) ³	Light Industrial	6,600.994	TSF
		Shopping Center	172.150	TSF
8	TR30760	Single Family Residential	285	DU
	TR31818	Single Family Residential	311	DU
		Community Park	11.65	AC
	TR31908	Single Family Residential	261	DU
9	TR33688	Single Family Residential	49	DU
10	PP 25397	Manufacturing	60.300	TSF
11	PM 30626	Business Park	8.7	AC
12	PP22355	Fast Food w/ Drive Thru	2.500	TSF
		Retail	30.214	TSF
13	PP22762	General Office	93.924	TSF
14	PP25719	General Light Industrial	84.892	TSF
15	Specific Plan No. 00327 (Toscana Phase I and Phase III)	SFDR	917	DU
		Active Park	8.1	AC
16	SMP 139R1 (CUP 03679)	Surface Mining	2.0	MTPY
17	Arantine Hills Specific Plan	Single Family Residential	549	DU
		Multi-Family Residential	1,072	DU
		Passive Park	4.0	AC
		Active Park	11.0	AC
		General Office	59.000	TSF
		Business Park	230.900	TSF
		Specialty Retail	59.000	TSF
Shopping Center	396.400	TSF		
18	Dos Lagos Specific Plan	Apartments (PA 1)	450	DU
19	CUP 12-004	Hotel	120	RM



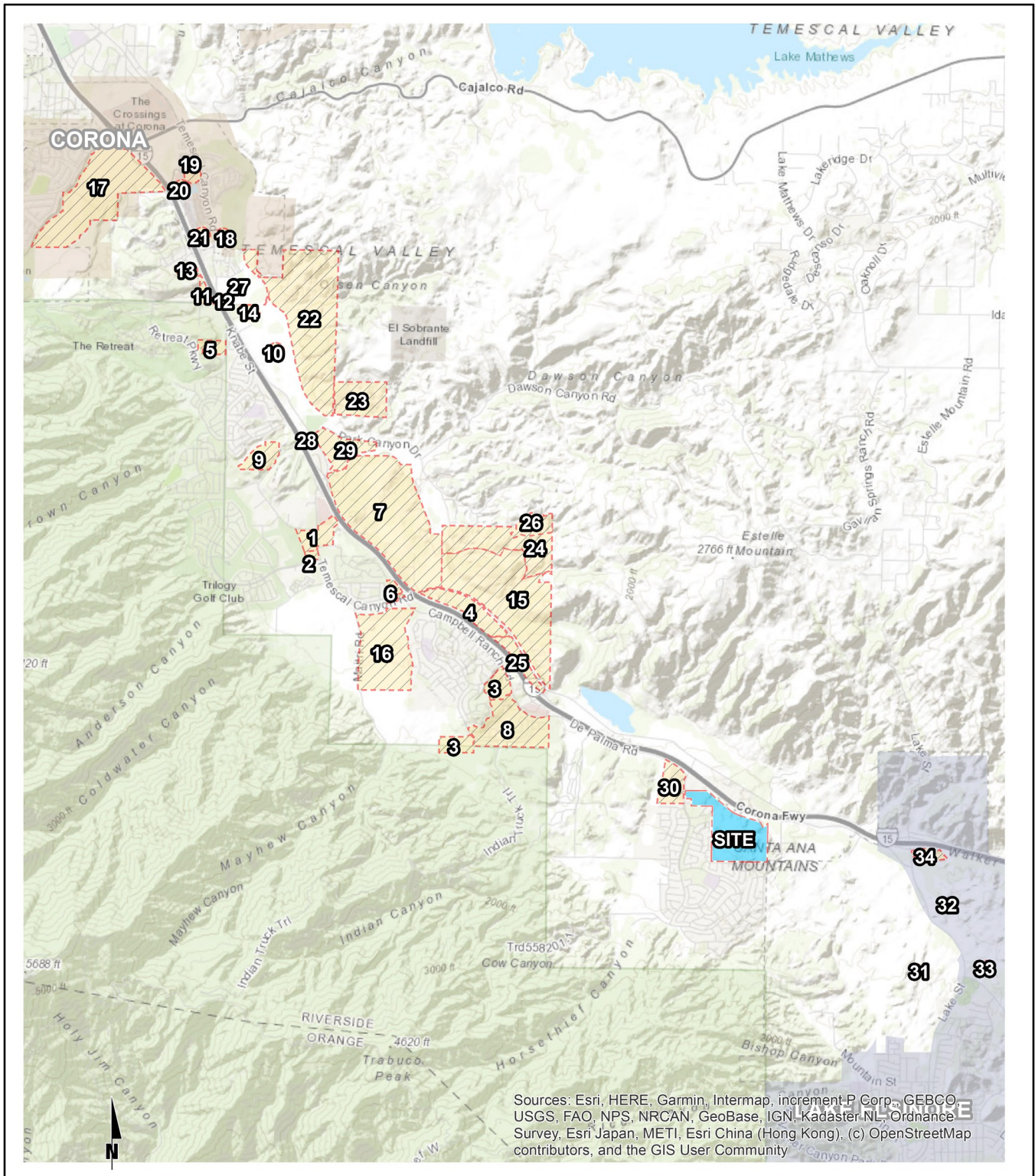
Table 4.0-1 Cumulative Development Land Use Summary (Cont'd)

#	Name	Land Use	Intensity	
20	CUP 12-005	Apartments	125	DU
21	DPR 13-003	Apartments	354	DU
22	Olsen Canyon	Surface Mining	2.0	MTPY
23	PP24226 (Leinen Business Park)	Manufacturing	135.421	TSF
24	Toscana Phase 2	Single Family Residential	501	DU
		Active Park	5.0	AC
		Passive Park	0.9	AC
25	CUP 3712 (Phase 1 + Phase 2)	Gas Station w/ Market and Car Wash	12	DU
		Fast Food w/ Drive Thru	6.800	TSF
		High Turnover Restaurant	20.000	TSF
		General Office	56.000	TSF
		Shopping Center	46.900	TSF
		Supermarket	43.000	TSF
		Pharmacy w/ Drive Thru	14.000	TSF
		Bank w/ Drive Thru	3.500	TSF
26	TTM No. 37554 & 37556	Single Family Residential	143	DU
27	PPT180006	Warehousing	30.250	TSF
28	CUP190053	Marijuana Dispensary	8.582	TSF
29	Corona Clay	Industrial Park	1,025.766	TSF
		Fast-Food w/ Drive Thru	5.400	TSF
		Super Convenience Market/Gas Sta.	16	VFP
30	Horsethief Canyon Residential	Single Family Residential	230	DU
City of Lake Elsinore				
31	Alberhill Villages	Single Family Residential	9,536	DU
32	Alberhill Ridge (Tract 35001)	Single Family Residential	1,056	DU
		Apartments	345	DU
		Shopping Center	679.000	TSF
		General Office	679.000	TSF
33	Alberhill Ranch	Single Family Residential	362	DU
34	Lake Street/I-15 Property	Public RV Storage & Self Storage	13.3	AC
		Gas Station w/ Market	12	VFP

¹ DU = Dwelling Units; TSF = Thousand Square Feet; AC = Acres; MTPY = Million Tons Per Year; STU = Students; VFP = Vehicle Fueling Positions

² Land Use and Quantity Source: Specific Plan No. 00374 (TTM No. 34476) TIA, Urban Crossroads, Inc., August 18, 2008.

³ Source: Serrano Commerce Center TIA, Kunzman Associates, November 20, 2008.
(Urban Crossroads, 2020x)



Source(s): Urban Crossroads (10-14-2021)

Figure 4.0-1



Not to Scale



Cumulative Development Projects Location Map



The analysis of long-term cumulatively-considerable traffic impacts considers full buildout of nearby portions of unincorporated Riverside County and the City of Lake Elsinore, based on the land use designations applied to these lands by the Riverside County General Plan, except as otherwise noted in the cumulative impact analyses provided in EIR Subsections 4.1 through 4.21.

The cumulative study area for evaluation is identified and defined in each Subsection of Chapter 4.0. For example, the issue of aesthetics considers the Project's viewshed, which is defined as the geographical area that is visible from a given location and represents the area within which the Project has the potential to result in adverse impacts to scenic resources. Within the Project's viewshed, which primarily includes portions of Riverside County as well as very limited portions of the City of Lake Elsinore, the cumulative analysis of aesthetics assumes buildout in accordance with the County and City General Plans. For the issue of biology, the cumulative study area corresponds to the boundaries of the Western Riverside County Multiple Habitat Species Conservation Plan (MSHCP), as the MSHCP provides for the conservation of a wide variety of special status plant and animal species and encompasses a broad region that generally represents biological conditions associated with the Project area; thus, the cumulative study area for biological resources includes all future land uses within western Riverside County as called for by the General Plans of the County and the various cities that are included in the MSHCP region. Refer to the cumulative impact analysis provided in each Subsection in Chapter 4.0 for an issue-specific discussion of the cumulative study area.

For the issue of air quality, the cumulative study area comprises the South Coast Air Basin (SCAB), while the cumulative impact analysis relies on guidance from the South Coast Air Quality Management District (SCAQMD). The SCAQMD published a report giving direction on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (SCAQMD, 2003). In this report the AQMD states on page D-3:

"...the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions. The project specific (project increment) significance threshold is $HI > 1.0$ while the cumulative (facility-wide) is $HI > 3.0$. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."



The cumulative analysis provided in EIR Subsection 4.3 assumes that individual projects that do not generate emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts also would not cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related emissions that exceed SCAQMD thresholds for Project-specific impacts would be considered cumulatively considerable.

Compliance with the SCAQMD guidelines for evaluating direct and cumulatively-considerable impacts due to air quality emissions has been shown to result in a demonstrable reduction in air quality pollutants within the South Coast Air Basin. As more thoroughly discussed in EIR Subsection 4.3, regulations promulgated by the SCAQMD have led to a dramatic reduction in the level of air quality pollutants within the South Coast Air Basin (SCAB), including levels of ozone, particulate matter (PM₁₀ and PM_{2.5}), carbon monoxide (CO), and oxides of nitrogen (NO_x). As noted in the SCAQMD 2016 AQMP, "the remarkable historical improvement in air quality since the 1970's is the direct result of Southern California's comprehensive, multiyear strategy of reducing air pollution from all sources as outlined in its AQMPs" (SCAQMD, 2017). Improvements also have been seen in ozone levels. Part of the control processes of the SCAQMD's duty to greatly improve the air quality in the SCAB is the uniform CEQA review procedures required by SCAQMD's CEQA Handbook (SCAQMD, 2019). The single threshold of significance used to assess Project direct and cumulative impacts has in fact been successful, as evidenced by the track record of the air quality in the SCAB dramatically improving over the course of the past decades (refer to EIR Subsection 4.3 for an additional discussion on the improvements of air quality within the SCAB).

4.0.3 IDENTIFICATION OF IMPACTS

Subsections 4.1 through 4.21 of this EIR evaluate the twenty-one (21) environmental subjects warranting detailed analysis. The format of discussion is standardized as much as possible in each Subsection for ease of review. The environmental setting is discussed first, followed by a discussion of the Project's potential environmental impacts based on specified thresholds of significance used as criteria to determine whether potential environmental effects are significant.

The thresholds of significance used in this Program EIR are based on the thresholds presented in State CEQA Guidelines Appendix G and as applied by Riverside County to create the Project's standard Environmental Assessment (EA) Form. The thresholds are intended to assist the reader of this EIR in understanding how and why this EIR reaches a conclusion that an impact would or would not occur, is significant, or is less than significant.

Serving as the CEQA Lead Agency for this Program EIR, Riverside County is responsible for determining whether an adverse environmental effect identified in this EIR should be classified as significant or less than significant. While Riverside County has generally elected to use the thresholds presented in State CEQA Guidelines Appendix G, it should be noted that CEQA affords the County discretion to formulate standards of significance, and recognizes that the significance of a particular impact may vary with the setting. (14 Cal. Code Regs., § 15064(b).) The standards of significance used in this EIR are based on the independent judgment of the Riverside County, taking into consideration the updated State CEQA Guidelines Appendix G,



Riverside County’s Municipal Code, and adopted County policies and ordinances; the judgment of the technical experts that prepared this EIR’s Technical Appendices; performance standards adopted, implemented, and monitored by regulatory agencies; significance standards recommended by regulatory agencies; and the standards in CEQA that trigger the preparation of an EIR. As required by State CEQA Guidelines § 15126.2(a), impacts are identified in this EIR as direct, indirect, cumulative, short-term, long-term, on-site, and/or off-site impacts of the proposed Project. A summarized “impact statement” is provided in each subsection following the analysis.

The following terms are used to describe the level of significance related to the physical conditions within the area affected by the proposed Project:

- No Impact: An adverse change in the physical environment would not occur.
- Less-than-Significant Impact: An adverse change in the physical environment would occur but the change would not be substantial or potentially substantial and would not exceed the threshold(s) of significance presented in this Program EIR.
- Significant Impact: A substantial or potentially substantial adverse change in the physical environment would occur and would exceed the threshold(s) of significance presented in this Program EIR, requiring the consideration of mitigation measures.

Each Subsection also includes a discussion or listing of the applicable regulatory criteria (laws, policies, regulations, etc.) that the Project is required to comply with (if any). If impacts are identified as significant after mandatory compliance with regulatory criteria, feasible mitigation measures are presented that would either avoid the impact or reduce the magnitude of the impact. The following terms are used to describe the level of significance following the application of recommended mitigation measures:

- Less-than-Significant Impact with Mitigation: A substantial or potentially substantial adverse change in the physical environment would occur that would exceed the threshold(s) of significance presented in this Program EIR; however, the impact can be avoided or reduced to a less-than-significant level through the application of feasible mitigation measure(s).
- Significant and Unavoidable Impact: A substantial or potentially substantial adverse change in the physical environment would occur that would exceed the threshold(s) of significance presented in this Program EIR. Feasible and enforceable mitigation measure(s) that have a proportional nexus to the Project’s impact are either not available or would not be fully effective in avoiding or reducing the impact to below a level of significance.

For any impact identified as significant and unavoidable, Riverside County would be required to adopt a statement of overriding considerations pursuant to State CEQA Guidelines § 15093 in order to approve the Project despite its significant impact(s) to the environment. The statement of overriding considerations would



list the specific economic, legal, social, technological, and other benefits of the Project, supported by substantial evidence in the Project's administrative record, that outweigh the unavoidable impacts.



4.1 AESTHETICS

This subsection describes the aesthetic qualities and visual resources present on the Project site and in the site's vicinity and evaluates the potential effects that the Project may have on these resources. Descriptions of existing visual characteristics, both on-site and in the vicinity of the Project site, and the analysis of potential impacts to aesthetic resources are based, in part, on site photographs included as part of the Project's application materials, analysis of aerial photography (Google Earth, 2018), and Project application materials related to the proposed development that were submitted to Riverside County and described in Section 3.0, *Project Description*, of this EIR. This Subsection also is based in part on information and policies contained in the Riverside County General Plan (Riverside County, 2021a), Riverside County GIS database (RCIT, 2021), Riverside County Ordinance No. 348 (Riverside County, 2020c), and Riverside County Ordinance No. 655 (Riverside County, 1988).

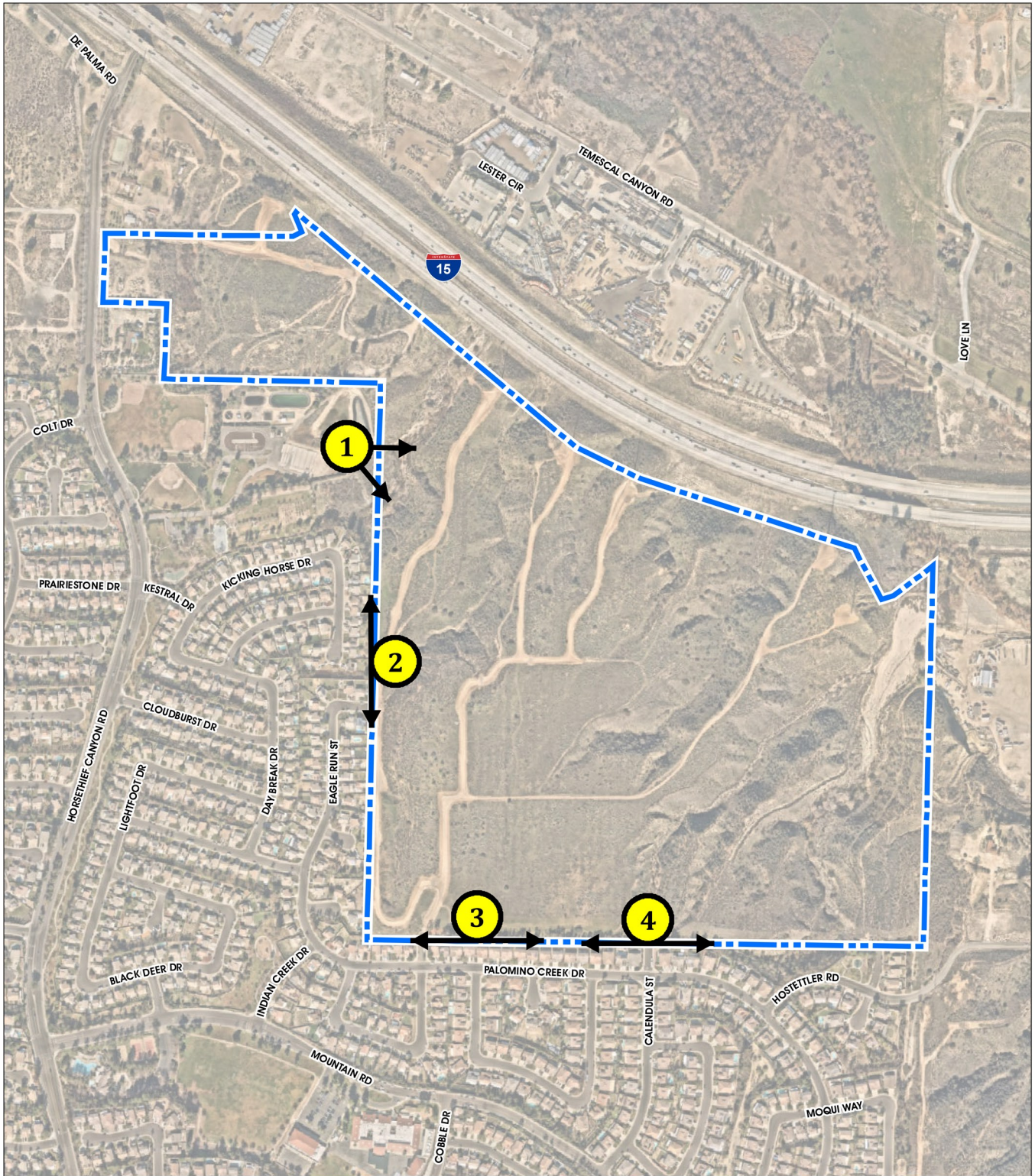
4.1.1 EXISTING CONDITIONS

A. Existing Aesthetic Conditions

The Project site comprises 157.1 acres of undeveloped land located south of I-15 and east of and abutting Horsethief Canyon Road. Under existing conditions, the Project site is largely undisturbed, with exception of informal trails throughout the property and a construction staging/storage area in the northwestern portion of the Project site, near Horsethief Canyon Road. The Project site generally slopes down in northeasterly direction and is characterized by ridges and canyons, with the high point at approximately elevation 1,430 feet above mean sea level (amsl) in the southwest corner of the Project site and the low point at approximately 1,187 feet amsl near the northeast corner of the Project site. Aside from the construction staging/storage area and the informal trails, the majority of the Project site contains natural largely undisturbed vegetation. (Google Earth, 2018)

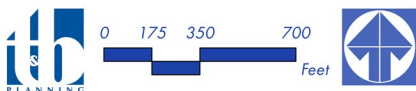
To illustrate the existing visual conditions of the Project site in more detail, a photographic inventory was prepared. Figure 4.1-1, *Site Photograph Key Map*, depicts the locations of the four vantage photographs, each of which are described below. These photographs, shown on Figure 4.1-2 and Figure 4.1-3, were taken in January 2020 and provide a representative visual inventory of the site's visual characteristics as seen from surrounding public viewing areas.

- Site Photograph 1 (Figure 4.1-2): Site Photograph 1 was taken along the western Project boundary and depicts easterly views of the Project site. As shown in this photograph, a chain link fence is visible in the foreground. In the middle of the photograph, the Project site appears relatively flat with natural vegetation. Several existing trees that straddle the Project site boundary are visible in the right portion of the photo. Hill forms associated with the Temescal Mountains, located to the north of I-15, are visible in the distance.
- Site Photograph 2 (Figure 4.1-2): Site Photograph 2 was taken along the western Project boundary, along Eagle Run Street, and depicts easterly views of the Project site. As shown in this photograph, an existing ornamental fence is visible in the foreground. An existing informal dirt road is visible in



Source(s): Nearmap Aeria (2022), RCTLMA (2021)

Figure 4.1-1



Site Photograph Key Map



East

Southeast

Photo 1: Northwest of the project boundary looking southeast toward Hostettler Rd



North

South

Photo 2: West of the project boundary, along Eagle Run St looking to the North toward the I-15 and South toward Palomino Creek Dr

Figure 4.1-2

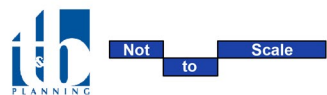




Photo 3: From the end of Bucking Bay Dr, looking west towards Eagle Run St and east toward Calendula St.



Photo 4: From the end of Calendula St, looking west and north toward the I-15.

Figure 4.1-3



the foreground in the left portion of the photo. The middle of the photo shows the slight rolling topography of the Project site that is covered by largely undisturbed natural vegetation. Hillforms associated with the Temescal Mountains are visible in the distance in the left portion of the photo.

- Site Photograph 3 (Figure 4.1-3): Site Photograph 3 was taken along the southern Project boundary from the existing terminus of Eagle Run Street, and depicts northerly views of the Project site. As shown, an existing chain link fence that occurs along the Project site boundary is visible in the foreground. In the middle of the photo are heavily disturbed areas with ruderal vegetation, with an informal dirt road and natural vegetation visible in the distance. Existing residences associated with the adjacent residential development are visible in the distance in the left portion of the photo. In the distance in the center portion of the photo, the hillforms associated with the Temescal Mountains are visible.
- Site Photograph 4 (Figure 4.1-3): Site Photograph 4 was taken along the southern Project boundary from the existing terminus of Calendula Street, and depicts northerly views of the Project site. As shown, an existing chain link fence that occurs along the Project site boundary is visible in the foreground. In the middle of the photo, an existing small canyon escarpment is visible, above which are flatter portions of the Project site. Areas of natural and disturbed vegetation are visible throughout this portion of the Project site. In the distance in the left portion of the photo, the existing residences associated with the adjacent residential development are visible. In the distance in the right portion of the photo, the hillforms associated with the Temescal Mountains are visible.

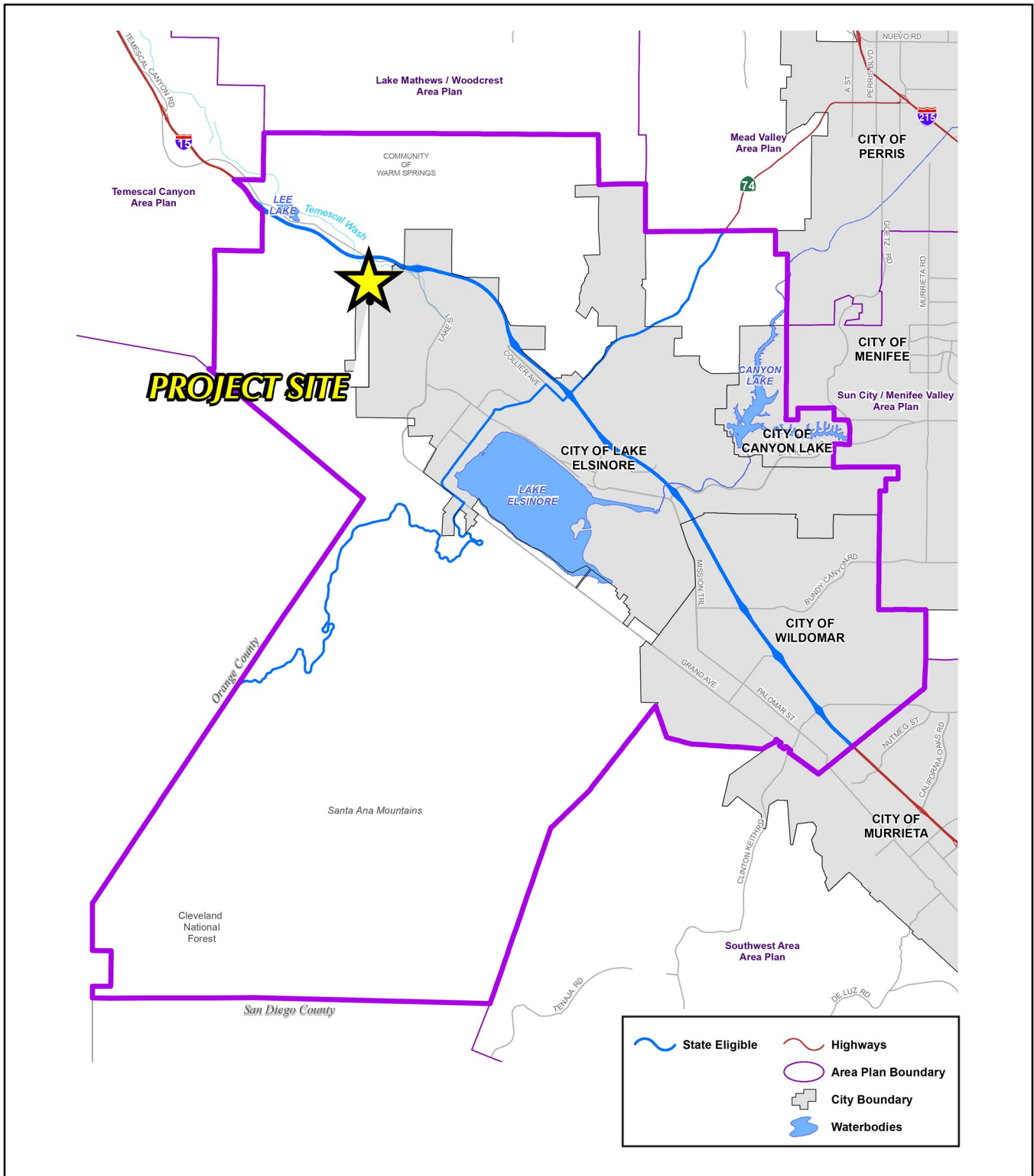
B. Scenic Highways

According to Figure 9 of the Riverside County General Plan Elsinore Area Plan (EAP), and as shown on Figure 4.1-4, *Elsinore Area Plan Scenic Highways*, there are no State or County designated scenic highways within the Project vicinity. The nearest State-designated scenic highway are segments of State Route 74 (SR 74), located approximately 32.1 miles east of the Project site. The nearest State Eligible scenic highway is Interstate 15 (I-15), located immediately to the north of the Project site. Nearby segments of State Route 74 (SR 74), located approximately 4.1 miles southeast of the Project site, also are designated as a State Eligible scenic highway corridor. In addition, Cajalco Road, located approximately 5.6 miles north of the Project site, is identified as a County Eligible scenic highway. (Riverside County, 2021b, Figure 9; RCIT, 2021; Google Earth, 2018)

4.1.2 APPLICABLE REGULATORY REQUIREMENTS

A. Riverside County General Plan

The Riverside County General Plan does not have any specific sections related to aesthetics and visual resources. However, the Land Use Element of the Riverside County General Plan includes policies related to Land Use Compatibility, Community Design, and Scenic Corridors, which have applicability to the topic of aesthetics. The Land Use Element provides direction related to how future development is intended to build out, such as the intensity/density and character of new development. The Land Use Element also addresses the relationship between development, community enhancement, and natural resource management.



Source(s): Elsinore Area Plan (08-2020)

Figure 4.1-4



Not to Scale



Elsinore Area Plan Scenic Highways



The Multipurpose Open Space Element of the Riverside General Plan also addresses open space and scenic resources in Riverside County. According to the Multipurpose Open Space Element, scenic resources include: "...areas that are visible to the general public and considered visually attractive," and "...natural landmarks and prominent or unusual features of the landscape." Hillsides and ridges that rise above urban or rural areas or highways can also be considered scenic backdrops. Additionally, the Multipurpose Open Space Element defines scenic vistas as "...points, accessible to the general public, that provide a view of the countryside." Riverside County General Plan Policy OS 21.1 intends to "[i]dentify and conserve the skylines, view corridors, and outstanding scenic vistas within Riverside County." (Riverside County, 2021a, pp. OS-52 to OS-53)

The Circulation Element, Land Use Element, and Multipurpose Open Space Element of the Riverside County General Plan also identify scenic corridors, which are roadways (including State and County eligible and designated scenic highways) that traverse scenic resources, and identify policies that are intended to protect and maintain the scenic resources within these corridors (Riverside County, 2021a, p. OS-52) Scenic highways in the Project vicinity are depicted on Figure 4.1-4. As noted in the EAP, Policy ELAP 11.1 seeks to "[p]rotect Interstate 15 and State Route 74 from change that would diminish the aesthetic value of adjacent properties through adherence to the Scenic Corridors sections of the General Plan Land Use and Circulation Elements" (Riverside County, 2021b, p. 58)

B. Riverside County Ordinance No. 348, Land Use Ordinance

Riverside County's Land Use Ordinance No. 348 establishes allowable uses of land and sets standards for what and how land may be developed. The ordinance protects the people and property of Riverside County from development of unsuitable land uses and aims to ensure that built areas are developed safely and with minimal conflict with surrounding lands. Ordinance No. 348 also identifies requirements for landscaping associated with development proposals. The landscaping of development projects enhances the visual character and aesthetic quality of a site and its surroundings. (Riverside County, 2020c)

C. Riverside County Ordinance No. 655, Regulating Light Pollution

The County of Riverside has adopted an ordinance regulating light pollution (Ordinance No. 655). Ordinance No. 655 is intended to restrict the permitted use of certain light fixtures emitting light into the night sky which could have a detrimental effect on astronomical observation and research. Ordinance No. 655 sets forth requirements for lamp source and shielding of light emissions for outdoor fixtures to reduce "skyglow" or light pollution that affects day or nighttime views from the Mt. Palomar Observatory, which is located approximately 40.8 miles southeast of the Project site. As shown on EAP Figure 6 (Temescal Canyon Area Plan Mt Palomar Nighttime Lighting Policy Area), the Project site is located within the limits of "Zone B" of the Mt. Palomar Observatory Lighting Policy Area (Riverside County, 2021b, Figure 6). As such, the Project site is subject to the outdoor lighting policies and requirements applicable to Zone B that are stated in Riverside County Ordinance No. 655. This Ordinance includes specific standards for lighting fixtures installed along public roadways and in other common areas and applies to all new development. The use of low-pressure sodium lamps is encouraged where possible by Ordinance No. 655, and the Ordinance also requires the shielding of all nonexempt outdoor lighting fixtures, specifies the hours of operation for non-exempt outdoor lighting fixtures, and regulates lighting fixtures used to illuminate an outdoor advertising display. (Riverside County, 1988)



D. Riverside County Ordinance No. 915, Regulating Outdoor Lighting

The County of Riverside has adopted an ordinance regulating outdoor lighting (Ordinance No. 915). Ordinance No. 915 is intended to provide minimum requirements for outdoor lighting in order to reduce light trespass. Ordinance No. 915 provides regulations on adequate lighting shielding, glare, and light trespass in order to ensure all development in Riverside County installs lighting in a way that does not jeopardize the health, safety, or general welfare of Riverside County residents and degrade their quality of life. (Riverside County, 2012)

4.1.3 BASIS FOR DETERMINING SIGNIFICANCE

Section I of Appendix G to the State CEQA Guidelines addresses typical adverse effects to aesthetics, and includes the following threshold questions to evaluate a project's impacts on aesthetics (OPR, 2018a):

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- 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 point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; or
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Additionally, the following thresholds are derived from Riverside County's Environmental Assessment Checklist, as revised to reflect the December 2018 updates to the State CEQA Guidelines. As such, the following thresholds are used to evaluate the significance of the proposed Project's impacts on aesthetics. The proposed Project would result in a significant impact to aesthetics if the Project or any Project-related component would:

- a. Have a substantial effect upon a scenic highway corridor within which it is located;*
- 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;*
- 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;*



- d. *Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655;*
- e. *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area; or*
- f. *Expose residential property to unacceptable light levels.*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, which are based on Appendix G to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on aesthetics.

4.1.4 IMPACT ANALYSIS

Threshold a.: Would the Project have a substantial effect upon a scenic highway corridor within which it is located?

As previously indicated and as depicted on Figure 4.1-4, there are no officially-designated scenic highway corridors within the Project's viewshed. The nearest State Eligible scenic highway is Interstate 15 (I-15), located immediately to the north of the Project site. Nearby segments of State Route 74 (SR 74), located approximately 4.1 miles southeast of the Project site, also are designated as a State Eligible scenic highway corridor. In addition, Cajalco Road, located approximately 5.6 miles north of the Project site, is identified as a County Eligible scenic highway. Due to distance and intervening topography, development, and landscaping/vegetation, the proposed Project would not be prominently visible from nearby segments of SR 74 or Cajalco Road; thus, Project impacts to the SR 74 and Cajalco Road would be less than significant.

The proposed Project would, however, be prominently visible from nearby segments of I-15. Specifically, the Project would result in the conversion of the property from an undeveloped parcel of land to a developed property containing 18.0 acres of business park land uses and 97.2 acres of light industrial land uses, with open space areas planned in the eastern portion of the Project site. Although this represents a substantial change to views along this State-eligible facility, development on site would be required to comply with the development standards and design guidelines included as part of proposed SP 333A1, which have been designed to ensure that the property is developed in a manner that is not aesthetically offensive. Design guidelines included as part of SP 333A1 include guidance related to site design, architecture, and landscaping, compliance with which would be assured by the County's future review of implementing applications (e.g., plot plans, building permits, etc.). The following is a summary of the SP 333A1 Design Guidelines that are related to the issue of aesthetics (refer to Chapter 4 of EIR *Technical Appendix O* for a complete listing of the design guidelines requirements of proposed SP 333A1):

- Section 4.2, *Design Theme*, of proposed SP 333A1 requires a contemporary aesthetic, which would provide architectural styling with attractive detailing, steel accents, a light-toned color palette, and timeless features. Signs would be modern, lighting would be focused and directed, landscaping would be colorful and drought-tolerant, and design features would be applied that lower energy use demands of building operations.



- Section 4.4, *Architectural Design Guidelines*, of proposed SP 333A1 emphasizes a contemporary interpretation of the traditional context with building massing over structural articulation. Buildings would be characterized by simple and distinct cubic masses with interlocking volumes of wall planes, colors, and materials to create visual appeal, aesthetically pleasing proportions and strong shadow patterns. Colors, materials, and textures can be mixed to create interest. Specific elements of the Architectural Design Guidelines include the following:
 - Subsection 4.4.1, *Building Form*, indicates that building forms are especially important for building faces that are visible along the I-15 corridor, and provides guidelines intended to ensure that structural development is visually consistent, appealing, and inviting to pedestrians and motorists.
 - Subsection 4.4.2, *Building Materials, Colors, and Textures*, requires that the selected exterior materials, colors, and textures should complement one another, with slight variations to provide visual interest. This subsection identifies concrete and similar materials, as well as tilt-up panels, as the primary building materials, and requires that the primary materials be accented by secondary materials including but not limited to natural or fabricated stone, fire-resistant wood siding (horizontal or vertical), and metal. Primary exterior building colors are intended to be light and gray tones, with darker and/or more vibrant accent colors in focal point areas, such as around building entrances and near outdoor gathering spaces.
 - Subsection 4.4.3, *Windows and Doors*, requires that the patterns of window and door openings shall correspond with the overall rhythm of the building and should be consistent in form, pattern, and color within each planning area.
 - Subsection 4.4.4, *Walls and Fences*, provides guidelines intended to ensure that proposed walls and fences would complement the overall design them for the Project.
 - Subsection 4.4.5, *Truck Courts and Loading Docks*, provides guidelines intended to ensure that truck courts and loading docks are screened from public view so as to reduce the visibility of these areas.
 - Subsection 4.4.6, *Ground or Wall-Mounted Equipment*, provides guidelines intended to ensure that ground or wall-mounted equipment is screened from public viewing areas.
 - Subsection 4.4.7, *Rooftop Equipment*, provides guidelines intended to ensure that rooftop equipment is screened by rooftop screens or parapet walls to minimize visibility from nearby public roads, including the I-15.
 - Subsection 4.4.8, *Trash Enclosures*, provides guidelines intended to ensure that outdoor refuse containers are screened within a permanent, durable enclosure and oriented so that they are not clearly visible from public roads, including I-15.



- Subsection 4.4.10, *Outdoor Lighting*, includes guidelines for lighting to ensure that future lighting on site comports to all County standards and requirements, including Riverside County Ordinance No. 655.
- Subsection 4.4.11, *Signage Guidelines*, includes guidelines related to signage, and requires the preparation of a Master Sign Program to ensure signage on site is visually appealing and consistent throughout the Project.
- Section 4.5, *Supplemental Guidelines for Light Industrial & Business Park Uses*, sets forth additional guidelines that address considerations unique to all uses permitted within the light industrial and business park land uses within the Project. These guidelines encourage offices to be located toward I-15 and other public roadways; require orientation and screening of elements such as trash enclosure areas, loading bay doors, and service docks from public viewing areas, including I-15; promotes designing future buildings in a manner consistent with the overall Project design theme; encourages textured forms, reveals, scoring, or color variation on concrete tilt-up panels for visual relief; encourages variations in parapet heights to break up rooflines; and requires the screening of all rooftop mounted equipment to the extent practical from public viewing areas, using materials complementary to those used on the main structure.
- Section 4.6, *Landscape Design Guidelines*, is intended to ensure that plant materials, entries and monuments, streetscapes and other amenities are compatible with the overall design theme, and that all implementing development projects are united under a common design theme, and help to establish a contemporary, visually appealing development that takes into consideration surrounding areas. The Landscape Design Guidelines include a plant palette, identify landscape zones (including entries), provide standards for monumentation, identify treatments for streetscapes, provide standards related to walls and fences, and provide standards for landscape interfaces.

Furthermore, it should be noted that I-15 is not officially designated as a State scenic highway. Based on the foregoing analysis, and assuming mandatory compliance with the design guidelines and development standards of proposed SP 333A1, Project impacts to scenic highways would be less than significant.

Threshold b.: *Would the Project 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?*

Threshold c.: *In non-urbanized areas, would the Project 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?

Under existing conditions, the 157.1-acre Project site is vacant and undeveloped, but is located in a primarily urban portion of unincorporated Riverside County, with master-planned residential communities occurring to the south and west of the Project site. The topography of the Project site generally slopes down in northeasterly direction and is characterized by ridges and canyons, and is visually similar to other undeveloped areas in the Project vicinity. Although portions of the Project site contain trees, these trees do not form a major component of the Project's viewshed. There are no prominent rock outcroppings or unique or landmark features on the Project site under existing conditions.

With implementation of the proposed Project, the majority of the Project site would be developed with light industrial and business park land uses. While precise grading plans would be developed in conjunction with future implementing developments (i.e., plot plans, etc.), retaining/geo-grid walls are anticipated to be used across the site and these walls may range in height from 0 to 30 feet, and in some instances may exceed 50 feet in height. Areas along the eastern boundary of the Project site, as well as a small area along the northern Project boundary, would be preserved as natural open space, while open space buffers are planned along the western and southern boundaries of the Project site, adjacent to the existing adjacent residential community. Although development of the Project site as proposed would represent a substantial change to the visual character of the site, the Project site does not contain any scenic resources, including but not limited to, trees, rock outcroppings, or landmark features. Additionally, although large retaining walls are anticipated with future site development, such walls primarily would occur along the western and southern site boundary. Views of these walls would be obscured from public view by the future buildings and landscaping on site. As such, implementation of the proposed Project would not damage scenic resources, and impacts would be less than significant.

The zoning ordinance associated with proposed SP 333A1 specifies a maximum building height of 60 feet, which would ensure that future buildings on site would not obstruct views of prominent elements of the Project's viewshed, such as the Temescal Mountains, which are located north of the Project site and north of I-15. Furthermore, the Project site slopes downward in a northeasterly direction, and occurs at a lower elevation than the existing residential community that occurs to the west and south of the Project site. As such, the Project would not obstruct any prominent scenic vista or view open to the public, and impacts would be less than significant.

Development on site would be required to comply with the development standards and design guidelines included as part of proposed SP 333A1, which have been designed to ensure that the property is developed in a manner that is not aesthetically offensive. Refer to the analysis of Threshold a. for a description of applicable design guidelines. Design guidelines included as part of SP 333A1 include guidance related to site design, architecture, and landscaping, compliance with which would be assured by the County's future review of implementing applications (e.g., plot plans, building permits, etc.). Mandatory compliance with the design guidelines and development standards of proposed SP 333A1 would ensure the Project site is developed in a manner that is not aesthetically offensive and in a manner that does not degrade the existing visual character or quality of public views of the site and its surroundings. Future development on site also would be required



to comply with the provisions of the zoning ordinance included as part of SP 333A1, including provisions related to scenic quality.

Based on the foregoing analysis, Project impacts to scenic resources and visual quality would be less than significant with mandatory compliance with the provisions of SP 333A1 and the SP 333A1 zoning ordinance.

Threshold d.: Would the Project interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?

As shown on EAP Figure 6 (Elsinore Area Plan Mt Palomar Nighttime Lighting Policy Area), the Project site is located within the limits of “Zone B” of the Mt. Palomar Observatory Lighting Policy Area (Riverside County, 2021b, Figure 6). All development projects within Zone B of the Mt. Palomar Nighttime Lighting Policy Area are required to adhere to the requirements of Riverside County Ordinance No. 655, which controls artificial lighting sources to protect the Observatory. Ordinance No. 655 states that low-pressure sodium lamps are the preferred illuminating source, and that outdoor lighting fixtures are required to be shielded. Pursuant to Section 7 of Ordinance No. 655, future building permits would be required to include specific information with regards to lighting, as follows: 1) the location of the site where outdoor light fixtures would be installed; 2) plans indicating the location and type of fixtures of the premises; and 3) a description of the outdoor light fixtures, including, but not limited to, manufacturer’s catalog cuts and drawings. The required plans and descriptions would enable the County to determine whether compliance with the requirements of the ordinance is met. No building permits would be issued by the County unless the building permit applications demonstrate consistency with the applicable provisions of Ordinance No. 655. As such, the Project has no potential to interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655, and impacts would be less than significant. (Riverside County, 1988)

Threshold e.: Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Threshold f.: Would the Project expose residential property to unacceptable light levels?

In addition to Riverside County Ordinance No. 655, which is addressed above under the analysis of Threshold d., future development on the Project site would be subject to Riverside County Ordinance No. 915 as well as the development standards and design guidelines of SP 333A1. Ordinance No. 915 requires that all outdoor luminaires shall be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way. Compliance with Ordinance No. 915 would be assured through future review of building permit applications by Riverside County, and would ensure that the Project does not expose residential property to unacceptable light levels. Impacts would be less than significant.

Additionally, SP 333A1 includes the following design guidelines for exterior lighting, which would serve to prevent the creation of substantial light that could adversely affect day or nighttime views in the area and the exposure of residential properties to unacceptable light levels (T&B Planning, 2022, Subsection 4.4.10):

- Minimize glare and “spill over” light onto public streets, adjacent properties, adjacent residential homes, and MSCHP areas by using downward-directed lights and/or cutoff devices on outdoor lighting



fixtures, including spotlights, floodlights, electrical reflectors, and other means of illumination for signs, structures, parking, loading, unloading, and similar areas. Where desired, illuminate trees and other landscape features by concealed up-light fixtures. Limit light spillover or trespass to one-quarter foot-candle or less, measured from within five feet of any adjacent property line.

- Select all lighting fixtures used in the Specific Plan area from the same – or a complementary – family of fixtures with respect to design, materials, fixture color, and light color. Use of LED lighting is encouraged.
- Lights should be unbreakable plastic, recessed, or otherwise designed to reduce the problems associated with damage and replacement of fixtures.
- Neon and similar types of lighting are prohibited in all areas within the Renaissance Ranch Commerce Center.
- Locate all electrical meter pedestals and light switch/control equipment in areas with minimum public visibility or screen them with appropriate plant materials.
- Illuminate parking lots, loading dock areas, pedestrian walkways, building entrances, and public sidewalks to the level necessary for building operation and security reasons. Dimmers and motion detectors are permitted.
- Along sidewalks and walkways, the use of low mounted fixtures (ground or bollard height), which reinforce the pedestrian scaled, are encouraged.
- Use exterior lights to accent entrances, plazas, activity areas, and special features.
- To illuminate parking lots or parking structures and their pedestrian links that provide more than five parking spaces for use by the general public, provide a minimum coverage of one foot-candle of light with a maximum of eight foot-candles on the parking or walkway surface, unless otherwise approved by the County of Riverside for visibility and security.
- To illuminate aisles and passageways within a building complex, provide a maximum of one-half to one foot-candle of maintained lighting.
- High Pressure Sodium (HPS) light fixtures are prohibited for site lighting.

Riverside County would review future implementing building permit applications for compliance with the Specific Plan design guidelines related to lighting. In addition, the SP 333A1 land use plan (EIR Figure 3-2) accommodates approximately 11.5 acres of “Open Space – Conservation” land uses along the western and southern boundaries of the Project site, which would provide a minimum 75-foot-wide landscaped buffer between planned light industrial development on site and the existing residential uses located to the west and south of the Project site. This landscaped buffer would include a 6- to 10-foot concrete block wall at the existing property line with the residential uses to the west and south, along with extensive landscaping. The proposed on-site light industrial uses also would occur at a lower elevation than the adjacent residential uses. Combined, these Project design features would ensure that the existing residential uses to the west and the south of the Project site are not exposed to substantial amounts of light associated with future site development, and would ensure impacts remain below a level of significance.



Furthermore, none of the Project's proposed building materials would consist of reflective materials, except for the proposed windows, which would not be mirrored and would have similar low-potential glare characteristics as do other glass windows on buildings in the Project vicinity. The proposed Project does not include any components that would generate substantial amounts of reflective surfaces to the Project vicinity; therefore, impacts associated with glare would be less than significant. Mandatory compliance with the development standards and design guidelines of SP 333A1 and Riverside County Ordinance Nos. 655 and 915 would ensure that all lighting and building design elements proposed by the Project are designed to prevent the creation of substantial light or glare that could affect day or nighttime views in the area. Accordingly, implementation of the Project would result in a less-than-significant impact related to new sources of light or glare.

Based on the foregoing analysis, and because the Project would be required to comply with the lighting standards in SP 333A1 as well as lighting provisions of Riverside County Ordinance Nos. 655 and 915, and further would be required to establish a minimum 75-foot landscaped buffer between existing residential uses to the west and south and the proposed on-site light industrial land uses, impacts due to Project lighting and glare, and due to the exposure of residential property to unacceptable light levels, would be less than significant.

4.1.5 CUMULATIVE IMPACT ANALYSIS

For purposes of analysis, the Project's cumulative study area includes all areas within the Project's viewshed, as the Project does not have the potential to result in cumulatively-considerable impacts to visual quality outside of areas in which the Project site is visible.

As discussed under the analysis of Threshold a., there are no officially-designated scenic highway corridors within the Project's viewshed. Although the proposed development would be visible from nearby segments of I-15, which is identified as a State Eligible scenic highway, the Project would be subject to compliance with the development standards and design guidelines of proposed SP 333A1, which would ensure that future development on site is visually compatible with surrounding areas. Areas to the west and south of the Project site are developed as part of a master-planned residential community, with areas to the east of the site consisting of rural residential dwellings, open space, and an existing construction storage yard. Thus, development of the Project as proposed would appear as a continuation of existing development patterns in the local area, and would not adversely affect views available from nearby segments of I-15. Moreover, I-15 is not officially designated as a scenic highway. Cumulatively-considerable impacts to scenic highways would be less than significant.

The Project would not damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features, and impacts would therefore be less-than-cumulatively considerable. Based on the Project site's topography relative to surrounding areas, future development is not anticipated to obstruct views of any scenic vistas or views open to public review, such as the Temescal Mountains located north of I-15; thus, impacts would be less-than-cumulatively considerable. Additionally, because the Project would be developed in compliance with the design guidelines and development standards of proposed SP 333A1, the



Project would not contribute to the creation of an aesthetically offensive site open to public view, and impacts would therefore be less-than-cumulatively considerable. In addition, with mandatory compliance with the design guidelines and development standards of proposed SP 333A1, the Project would not contribute to the substantial degradation of the existing visual character or quality of the site or its surroundings, and impacts would therefore be less-than-cumulatively considerable. Furthermore, the Project would comply with the SP 333A1 zoning ordinance as well as all applicable Riverside County ordinances governing scenic quality, and a cumulatively-considerable impact would therefore not occur.

The Project and other cumulative developments within the Project's viewshed would be required to comply with Riverside County Ordinance No. 655 requirements pertaining to Zone B. Compliance with Ordinance No. 655 would be assured through future County review of building permit applications. As such, cumulatively-considerable impacts due to a conflict with Ordinance No. 655 would not occur.

The proposed Project as well as other cumulative developments within the Project's viewshed would be subject to compliance with Riverside County Ordinance Nos. 655 and 915. Additionally, future development on site would be subject to the SP 333A1 lighting design guidelines (cited above under the analysis of Thresholds e. and f.), while the existing residential development to the south and west of the Project was developed in a manner consistent with Ordinance Nos. 655 and 915 as well as the design guidelines and development standards identified by the Horsethief Canyon Specific Plan No. 152. Future development on lands to the east of the Project site also would be subject to compliance with Ordinance Nos. 655 and 915. Although the Project and cumulative developments may incorporate building materials with the potential to create glare, only limited building materials such as glass would have the potential to create glare impacts, and such impacts would be minor and would not adversely affect day or nighttime views in the area. Impacts due to light and glare would be less-than-cumulatively considerable.

4.1.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Less-than-Significant Impact. The Project site is not located within the viewshed of any officially designated State or County scenic highways. While the Project would be visible from I-15, which is designated as a State-Eligible scenic highway, development on site would be required to comply with the development standards and design guidelines included as part of proposed SP 333A1, which have been designed to ensure that the property is developed in a manner that is not aesthetically offensive. As such, Project impacts to scenic highways would be less than significant.

Thresholds b. and c.: Less-than-Significant Impact. The Project would not substantially damage scenic resources; obstruct any prominent scenic vista or view open to the public; result in the creation of an aesthetically offensive site open to public view; substantially degrade the existing visual quality or character of the site or its surroundings; or conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant.

Threshold d.: Less-than-Significant Impact. Project compliance with the provisions of County Ordinance No. 655 would be assured through future County review of building permits. Impacts due to a conflict with Ordinance No. 655 would be less than significant.



Thresholds e. and f.: Less-than-Significant Impact. Mandatory compliance with the SP 333A1 design guidelines related to lighting, along with compliance with Riverside County Ordinance Nos. 655 and 915, would ensure that Project-related lighting and glare would not adversely affect day or nighttime views in the area, and also would ensure the Project does not expose residential property to unacceptable light levels. Impacts would be less than significant.

4.1.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- The Project is required to comply with Riverside County Ordinance No. 655, which is intended to restrict the permitted use of certain light fixtures emitting light into the night sky which could have a detrimental effect on astronomical observation and research. Ordinance No. 655 sets forth requirements for lamp source and shielding of light emissions for outdoor fixtures to reduce "skyglow" or light pollution that affects day or nighttime views from the Mount Palomar Observatory (located approximately 36.5 miles south of the Project site in northern San Diego County). Pursuant to the requirements of Ordinance No. 655, all lighting shall consist of low-pressure sodium lighting, or other lamp types that emit 4050 lumens or less. If light fixtures are proposed above 4050 lumens, then the lighting shall be fully shielded in conformance with the requirements of Ordinance No. 655.
- The Project is required to comply with Riverside County Ordinance No. 915, which is intended to provide minimum requirements for outdoor lighting in order to reduce light trespass. Ordinance No. 915 provides regulations on adequate lighting shielding, glare, and light trespass in order to ensure all development in Riverside County installs lighting in a way that does not jeopardize the health, safety, or general welfare of Riverside County residents and degrade their quality of life.
- The Project is required to comply with the Development Standards and Design Guidelines of SP 333A1, including standards related to lighting. Compliance with these Design Guidelines would be assured by the County's future review of implementing building permit applications for compliance with the Specific Plan's design features that would serve to reduce and/or avoid impacts relating to aesthetics.

Mitigation

Impacts would be less than significant; therefore, mitigation is not required.



4.2 AGRICULTURE AND FORESTRY RESOURCES

The information and analysis in this Subsection is based in part on information obtained from the California Department of Conservation (CDC) Farmland Mapping & Monitoring Program (FMMP) (CDC, 2021), Riverside County GIS (RCIT, 2021), and the Riverside County General Plan Amendment 960 Final EIR (Riverside County, 2015). Refer to Section 7.0, *References*, for a complete list of these and other reference sources.

4.2.1 EXISTING CONDITIONS

A. Forestry Resources

The Project site is located in the Elsinore portion of unincorporated Riverside County, a rapidly urbanizing region that generally contains dry, sparsely-vegetated terrain in the natural condition. As shown in Figure 4.5.2 of the Riverside County General Plan Update Draft EIR No. 521, the Project site does not contain any forestry resources under existing conditions. The nearest areas containing forests occur within the Cleveland National Forest, located approximately 1.0 mile south of the Project site. (Riverside County, 2015, Figure 4.5.2)

B. Agricultural Resources

1. Regional Agricultural Setting

According to the Riverside County Agricultural Commissioner's Office, in a document entitled, "Riverside County Agricultural Production Report 2018," the top three categories of agricultural resources cultivated in Riverside County (by value) are nursery stock, milk, and table grapes. In 2018 (the most recent year for which data is available), the total gross value of agricultural production in Riverside County was approximately \$1.30 billion, which represents a slight increase (6.3%) from 2017 when total values were \$1.22 billion. (Agricultural Commissioner's Office, 2018)

The CDC reports that agricultural lands face continuing pressure from urbanization and rising production costs. The CDC's "2014-2016 California Farmland Conversion Report" summarizes land use conversion between 2014 and 2016 (the most recent years for which information has been reported by the CDC), and states that Riverside County as a whole experienced a net loss of 3,635 acres of "Important Farmland" between 2014 and 2016, representing a decline of 0.9% (CDC, n.d., p. 53, Table A-25). "Important Farmlands," as defined in the CDC report, include Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance.

2. Historic and Existing Site Conditions

According to the Project's Phase I Environmental Site Assessment (EIR *Technical Appendix G*), the Project site was partially used for agricultural uses, including orchards, from as early as the 1960s until approximately 1997 (Hillmann, 2019, p. 2). Under existing conditions, the Project site largely consists of undeveloped open space, with several informal dirt trails traversing the property. No agricultural uses occur on site under existing conditions.



3. Zoning

As described in EIR Section 2.0, *Environmental Setting*, the 157.1-acre Project site is zoned for “Specific Plan Zone (SP Zone),” indicating that the property is within the boundaries of an adopted specific plan. The Renaissance Ranch Specific Plan No. 333 designates the property for future development of up to 355 Medium Density Residential dwelling units, a 4.3-acre Community Park, four pocket parks on 2.0 acres, Open Space/Conservation land uses on 27.1 acres, and Open Space/Drainage uses on 25.7 acres. The Project site is not zoned for agricultural production under existing conditions. The nearest property that allows for agricultural use per the County’s zoning occurs along the eastern Project site boundary, and is zoned for “Residential Agricultural, 5-Acre Minimum Lot Size (R-A-5); however, pursuant to Riverside County Ordinance No. 625, lands designated for R-A-5 are not considered “land zoned for primarily agricultural purposes.” There are no lands zone primarily for agricultural use, as defined by Ordinance No. 625, within the Project vicinity. (RCIT, 2021)

4. Agricultural Land Designations

The goal of the California Department of Conservation’s Farmland Mapping and Monitoring Program (FMMP) is to provide consistent, timely, and accurate data to decision makers for use in planning for the present and future of California’s agricultural land resources. To meet this goal, FMMP’s objective is to provide maps and statistical data to the public, academia, and local, State, and federal governments to assist them in making informed decisions for the best utilization of California’s farmland. The FMMP was established in 1982 in response to what was by then a critical need for data on the nature, location, and extent of farmland, grazing land, and urban built-up areas in the State. California Government Code § 65570 mandates FMMP to biennially report to the Legislature on the conversion of farmland and grazing land, and to provide maps and data to local governments and the public. The FMMP also was directed to prepare and maintain an automated map and database system to record and report changes in the use of agricultural lands. It was the intent of the Legislature and a broad coalition of building, business, government, and conservation interests that FMMP be non-regulatory, and provide a consistent and impartial analysis of agricultural land use and change in California. With this in mind, FMMP provides basic data from which observations and analyses can be made in the land use planning process. (CDC, 2004, p. 3)

Pursuant to the FMMP, all lands within California are classified into one of seven map categories. The minimum mapping unit is generally 10 acres, except as otherwise noted (CDC, 2004, p. 6). Provided below is a description of the various map categories established by the FMMP:

- **Prime Farmland (P):** Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. (CDC, 2004, p. 6)
- **Farmland of Statewide Importance (S):** Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used



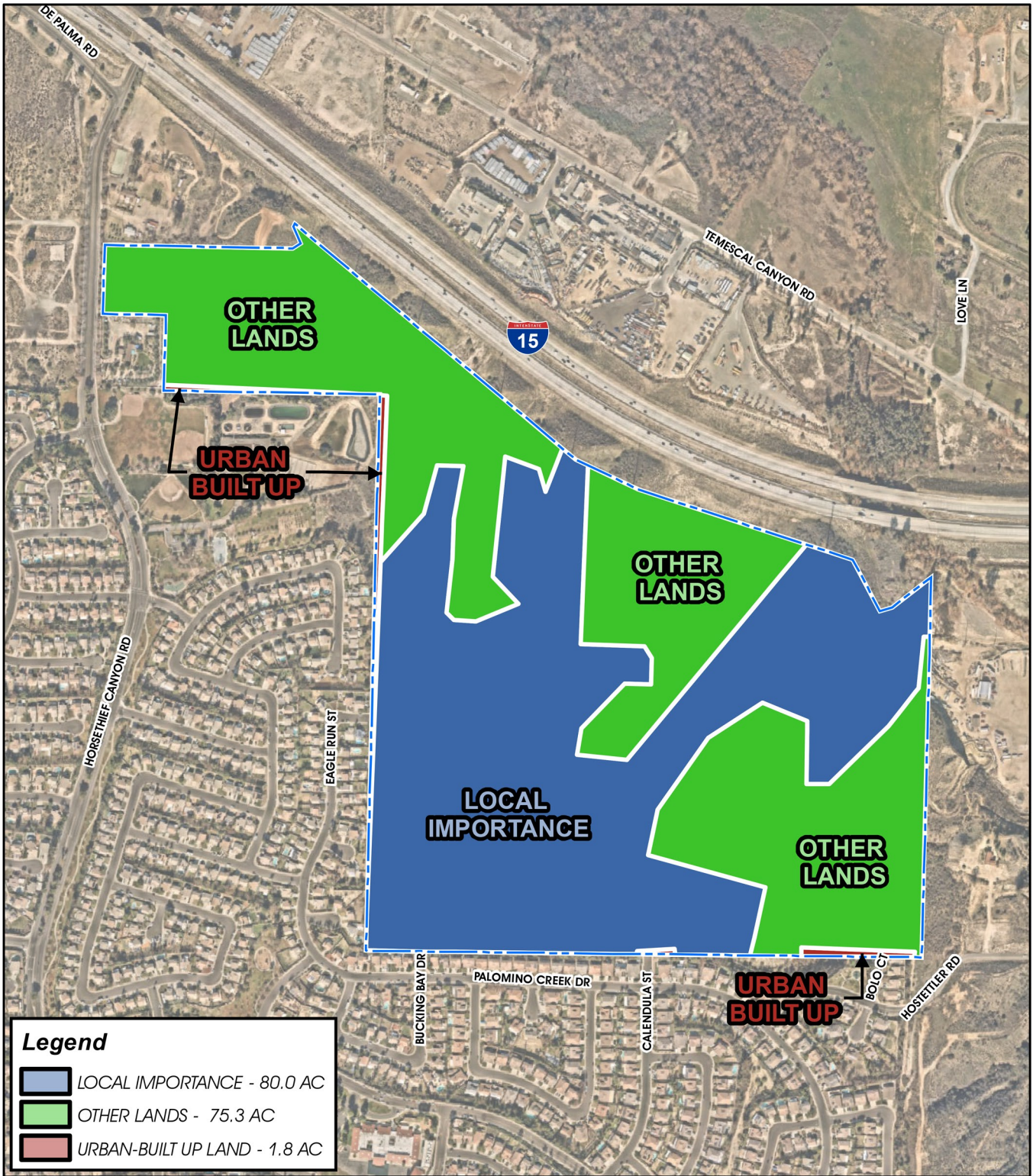
for irrigated agricultural production at some time during the four years prior to the mapping date. (CDC, 2004, p. 6)

- **Unique Farmland (U):** Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date. (CDC, 2004, p. 6)
- **Farmland of Local Importance (L):** Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. (CDC, 2004, p. 6)
- **Grazing Land (G):** Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit for Grazing Land is 40 acres. (CDC, 2004, p. 6)
- **Urban and Built-Up Land (D):** Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes. (CDC, 2004, p. 6)
- **Other Land (X):** Land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land. (CDC, 2004, p. 6)

As shown on Figure 4.2-1, *FMMP Farmland Map*, approximately 80.0 acres of the Project site are mapped as containing “Farmland of Local Importance,” while approximately 75.2 acres of the Project site are mapped as containing “Other Lands.” Approximately 1.8 acres along the western and southern boundaries of the Project site are mapped as “Urban and Built-Up Land.” “Farmland” is defined in Section II (a) of Appendix G of the State CEQA Guidelines to mean “Prime Farmland,” “Farmland of Statewide Importance,” “Unique Farmland,” or “Farmland of Local Importance.” Thus, “Farmland” on the Project site is limited to approximately 80.0 acres of areas mapped as “Farmland of Local Importance.”

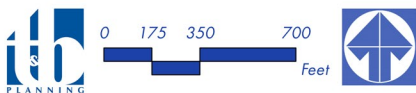
5. *Williamson Act Land Preserves and Agricultural Preserves*

Agricultural preserves are the result of Riverside County’s participation in the California Land Conservation Act (CLCA) of 1965, also known as the Williamson Act, CA Gov. Code § 51200, et seq. This program allows owners of agricultural land to have their properties assessed for tax purposes on the basis of agricultural



Source(s): RCTLMA (2022), Nearmap (2021)

Figure 4.2-1





production rather than current market value. The main purpose of the Act is to encourage property owners to continue to farm their land, and to prevent the premature conversion of farmland to urban uses. According to Riverside County GIS, the Project site is not included in any agricultural preserves, and is not subject to a Williamson Act Contract. There are no agricultural preserves or Williamson Act contracted land within the Project vicinity.

4.2.2 APPLICABLE ENVIRONMENTAL REGULATIONS

The following is a brief description of the state and local environmental laws and related regulations governing the protection of agricultural and forest resources.

A. State Regulations

1. *California Land Conservation Act (CLCA)*

The California Land Conservation Act (CLCA) of 1965, also known as the Williamson Act (CA Gov. Code § 51200, et seq.), enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value. Pursuant to Government Code § 51230, counties and cities may establish Agricultural Preserves, which define boundaries of those areas within which the city or county will be willing to enter into contracts pursuant to the CLCA; Contracts pursuant to the CLCA only are allowed for areas within established Agricultural Preserves. Agricultural Preserves generally must be at least 100 acres in size; however, a city or county may allow for lesser acreage if a finding is made that the characteristics of the agricultural enterprises in the area are unique and that the establishment of preserves of less than 100 acres is consistent with the general plan of the county or city. Once established, land uses within an Agricultural Preserve must be agricultural in nature, or other such uses that are not incompatible with agricultural uses. For lands within Agricultural Preserves, individual land owners may enter into a Contract with a county or city, which would provide for the exclusion of uses other than agricultural, and other than those compatible with agricultural uses, for the duration of the Contract, even if the land is sold to a new owner. In return for entering into a Contract, the landowner is granted preferential taxes that are based upon agricultural and related land uses rather than fair market value. Contracts may be exited at the option of the landowner or local government by initiating the process of term nonrenewal. Under this process, the remaining contract term (nine years in the case of an original term of ten years) is allowed to lapse, with the contract null and void at the end of the term. During the nonrenewal process, the annual tax assessment continually increases each year until it is equivalent to current tax rates at the end of the nonrenewal period. Under a set of specifically defined circumstances, a Contract may be cancelled without completing the process of term nonrenewal. Contract cancellation, however, involves a comprehensive review and approval process, and the payment of a fee by the landowner equal to 12.5 percent of the full market value of the property in question. (CDC, 2019a; CA Legislative Info, n.d.)



2. *Farmland Mapping and Monitoring Program (FMMP)*

The goal of the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) is to provide consistent, timely, and accurate data to decision makers for use in planning for the present and future of California's agricultural land resources. To meet this goal, FMMP's objective is to provide maps and statistical data to the public, academia, and local, state, and federal governments to assist them in making informed decisions for the best utilization of California's farmland. The FMMP was established in 1982 in response to what was by then a critical need for data on the nature, location, and extent of farmland, grazing land, and urban built-up areas in the State. Government Code § 65570 mandates FMMP to biennially report to the Legislature on the conversion of farmland and grazing land, and to provide maps and data to local government and the public. The FMMP also was directed to prepare and maintain an automated map and database system to record and report changes in the use of agricultural lands. It was the intent of the Legislature and a broad coalition of building, business, government, and conservation interests that FMMP be non-regulatory, and provide a consistent and impartial analysis of agricultural land use and change in California. With this in mind, FMMP provides basic data from which observations and analyses can be made in the land use planning process. (CDC, 2004, p. 3)

Pursuant to the FMMP, all lands within California are classified into one of seven map categories. The minimum mapping unit is generally 10 acres, except as otherwise noted (CDC, 2004, p. 6). A description of the seven map categories identified as part of the FMMP is included above in subsection 4.2.1.B.

3. *California Forest Practice Act*

The California Department of Forestry and Fire Protection (CAL FIRE) enforces the laws that regulate logging on privately-owned lands in California. The Forest Practice Act was enacted in 1973 to ensure that logging is done in a manner that will preserve and protect fish, wildlife, forests, and streams. The State Board of Forestry and Fire Protection enacts and enforces additional rules to protect these resources. (CAL FIRE, n.d.)

CAL FIRE ensures that private landowners abide by these laws when harvesting trees. Although there are specific exemptions in some cases, compliance with the Forest Practice Act and Board rules apply to all commercial harvesting operations for landowners of small parcels, to ranchers owning hundreds of acres, and large timber companies with thousands of acres. (CAL FIRE, n.d.)

The Timber Harvesting Plan (THP) is the environmental review documents submitted by landowners to CAL FIRE outlining what timber he or she wants to harvest, how it will be harvested, and the steps that will be taken to prevent damage to the environment. THPs are prepared by Registered Professional Foresters (RPFs) who are licensed to prepare these comprehensive, detailed plans. THPs can range from about 100 pages to more than 500 pages. (CAL FIRE, n.d.)

CAL FIRE does not have the authority to deny a THP that is in compliance with state and federal rules and laws, simply because the logging plan is unpopular with the public. The Department reviews and approves between 500 to 1400 THPs each year. A THP that does not comply with all forestry and environmental regulations is returned to the RPF. It is only approved after the RPF and landowner agree to make the changes



necessary to ensure compliance with all laws. CAL FIRE follows-up on approved THPs with site inspections and can shut down operations, cite or fine RPFs, Licensed Timber Operators (LTOs), and landowners if illegal operations are found. (CAL FIRE, n.d.)

B. Local Regulations

The following ordinances address farmland and agricultural preserves within unincorporated Riverside County.

- Riverside County Ordinance No. 509: This ordinance establishes uniform rules which apply to Agricultural Preserves. This ordinance determines which uses are agricultural or compatible uses within an Agricultural Preserve and prohibits all other uses within an Agricultural Preserve.
- Riverside County Ordinance No. 625: This “Right-to-Farm” Ordinance requires that development of residential uses adjacent to properties zoned primarily for agricultural purposes be regulated. Specifically, Ordinance No. 625 states that if any agricultural operation that has been in place for at least three years and is not considered a nuisance operation at the time the operation began, no change in surrounding land uses shall cause said operation to become a nuisance. A note is to be added to the Environmental Constraints Sheet for any tentative land division that states:

“...that no agricultural activity, operation, or facility, or appurtenances thereof, conducted or maintained for commercial purposes, and in a manner consistent with proper and accepted customs and standards, as established and followed by similar agricultural operations in the same locality, shall be or become a nuisance, private or public, due to any changed condition in or about the locality, after the same has been in operation for more than three (3) years if it was not a nuisance at the time it began.”

If any parcel within 300 feet of the site is zoned primarily for agricultural uses at the time of occupancy permit issuance, a project shall comply with the “Right-to-Farm” Ordinance. County Ordinance No. 625 defines land zoned for “primarily agricultural purposes” as any land lying within any one of the following zone classifications established by the Riverside County Land Use Ordinance No. 348: A-1 (Light Agriculture); A-P (Light Agriculture with Poultry); A-2 (Heavy Agriculture); A-D (Agriculture-Dairy); and C/V (Citrus/Vineyard).

4.2.3 BASIS FOR DETERMINING SIGNIFICANCE

A. Agricultural resources

Section II of Appendix G to the State CEQA Guidelines addresses typical adverse effects to agricultural and forestry resources, and includes the following threshold questions to evaluate the Project’s impacts on agricultural resources (OPR, 2018a):



- *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;*
- *Conflict with existing zoning for agricultural use, or a Williamson Act contract;*
- *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 Government Code section 51104(g));*
- *Result in the loss of forest land or conversion of forest land to non-forest use;*
- *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use;*

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section II of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact on forest or agricultural resources if construction and/or operation of the Project would:

- a. *Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local 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;*
- 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;*
- c. *Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm");*
- 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;*
- e. *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));*
- f. *Result in the loss of forest land or conversion of forest land to non-forest use; or*
- g. *Involve other changes in the existing environment which, due to their location or nature, could result in con-version of forest land to non-forest use.*



The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist were used to evaluate the significance of the proposed Project’s impacts on forest and agricultural resources.

4.2.4 IMPACT ANALYSIS

Threshold a.: Would the Project convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local 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?

As mapped by the CDC’s FMMP, the Project site is mapped as containing approximately 80.0 acres of “Farmland of Local Importance,” 75.2 acres of “Other Lands,” and 1.8 acres of “Urban and Built-Up Land.” Implementation of the proposed Project would result in direct, permanent impacts to 67.8 acres of “Farmland of Local Importance,” 60.4 acres of “Other Lands,” and 1.8 acre of “Urban and Built-Up Land.” Additionally, the remaining 12.2 acres mapped as “Farmland of Local Importance” and 14.8 acres of “Other Lands” occur in areas planned for long-term conservation of natural open space, and thus agricultural use of these areas would be precluded. Thus, the Project would result in direct and indirect impacts to approximately 80.0 acres of “Farmland of Local Importance,” 75.2 acres of “Other Lands,” and 1.8 acres of “Urban and Built-Up Land.” Of these FMMP designations, only “Farmland of Local Importance” is considered to comprise “Farmland.” As previously indicated, between 2014 and 2016, Riverside County had a decline in “Important Farmlands” of approximately 0.9%. The Project would contribute towards the loss of “Important Farmland” within Riverside County because agricultural production on site would be permanently precluded with implementation of the proposed Project. Thus, Project impacts to 80.0 acres of “Farmland of Local Importance” represent a significant impact of the proposed Project.

Threshold b.: Would the Project conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?

Under existing conditions, the Project site is not zoned for agricultural use. The nearest property that allows for agricultural use per the County’s zoning occurs along the eastern Project site boundary, and is zoned for “Residential Agricultural, 5-Acre Minimum Lot Size (R-A-5); however, pursuant to Riverside County Ordinance No. 625, lands designated for R-A-5 are not considered “land zoned for primarily agricultural purposes.” There are no lands zone primarily for agricultural use, as defined by Ordinance No. 625, within the Project vicinity. (RCIT, 2021) As such, the Project would not conflict with existing agricultural zoning, and no impact would occur.

Additionally, under existing conditions the Project site is not used for agricultural production. The nearest lands utilized for agricultural production consist of nursery uses and greenhouses located approximately 0.1 mile east of the Project site. The eastern portions of the Project site nearest to this existing agricultural use are planned for long-term conservation of open space. Additionally, there are no components of the proposed Project that could conflict with this existing agricultural use. As such, impacts would be less than significant.



According to Riverside County GIS, there are no agricultural preserves or Williamson Act contracted land within the Project vicinity. The nearest lands that are included within an agricultural preserve and/or are subject to a Williamson Act Contract occur approximately 2.0 miles west of the Project site (“Glen Ivy 1” Agricultural Preserve). Due to the distance between the Project site and the Glen Ivy 1 site, the Project has no potential to result in conflicts with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve. Impacts would be less than significant.

Threshold c.: Would the Project cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 “Right-to-Farm”)?

Riverside County Ordinance No. 625 defines “land zoned for primarily agricultural purposes” as including the following zone classifications established by the Riverside County Land Use Ordinance No. 348: A-1 (Light Agriculture); A-P (Light Agriculture with Poultry); A-2 (Heavy Agriculture); A-D (Agriculture-Dairy); and C/V (Citrus/Vineyard). Based on this definition, there are no agriculturally-zoned properties within 300 feet of the Project site. Additionally, lands to the southeast of the Project site within the City of Lake Elsinore are not zoned for agricultural uses. Accordingly, the Project would not cause development of non-agricultural uses within 300 feet of agriculturally zoned property, and no impact would occur.

Threshold d.: Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

Aside from the Project’s impacts to “Farmland” as discussed under the analysis of Threshold a., there are no components of the Project that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use. Although agricultural uses occur in the Project vicinity (refer to the discussion of Threshold b.), there are no components of the proposed Project that could indirectly affect these existing agricultural uses. Additionally, the light industrial and business park land uses proposed as part of the Project generally are considered to be compatible with agricultural uses. Thus, aside from the Project’s impacts to Farmland as discussed under the analysis of Threshold a., the Project would not result in any other changes to the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use, and impacts would be less than significant.



Threshold e.: *Would the Project 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))?*

Threshold f.: *Would the Project result in the loss of forest land or conversion of forest land to non-forest use?*

Threshold g.: *Would the Project 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?*

The Project site and surrounding areas are not zoned for 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)) (RCIT, 2021). As such, the Project has no potential to conflict with such zoning, and no impact would occur.

According to Figure 4.5.2 (Forestry Resources Western Riverside County) of Riverside County EIR No. 521, which was prepared in conjunction with the County's 2015 General Plan Update, the Project site does not contain any forestry resources under existing conditions. The nearest areas containing forests occur within the Cleveland National Forest, located approximately 1.0 mile south of the Project site. (Riverside County, 2015, Figure 4.5.2). Based on a review of aerial imagery, there are no forestry-related uses within the vicinity of the Project site (Google Earth, 2018). As such, the Project has no potential to result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur.

Furthermore, the Project would not 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. No impact would occur.

4.2.5 CUMULATIVE IMPACT ANALYSIS

The cumulative study area for the evaluation of potential impacts to agriculture and forestry resources includes all of western Riverside County. Lands within western Riverside County generally exhibit similar climate, geologic, and soil characteristics, and agricultural production is evaluated by Riverside County and the State of California at the County level. Additionally, agricultural lands throughout western Riverside County are subject to future development that would preclude agricultural uses, based on the various land use designations applied to lands throughout western Riverside County by the County's General Plan.

As discussed under Threshold a., the Project site contains Farmland as defined by State CEQA Guidelines Appendix G Section II(a), which would be converted to non-agricultural land use. Specifically, the Project would result in the permanent direct and indirect conversion of approximately 80.0 acres of "Farmland of Local Importance" to non-agricultural use. Other lands within western Riverside County that are designated by the County General Plan for urban development or that may be proposed in the future for urban development (i.e., as part of future General Plan Amendments) could also result in the conversion of Farmland to non-agricultural use. The Project and other cumulative developments would contribute to the on-going loss of



“Important Farmlands” within the County. Accordingly, Project impacts to Farmland would be cumulatively considerable.

As there are no lands zoned primarily for agricultural use abutting the Project site, the Project would not result in a conflict with existing agricultural zoning, and impacts would therefore be less-than-cumulatively considerable. The Project site also does not contain any agricultural uses under existing conditions, the Project site is not located within a Riverside County Agricultural Preserve, and the site is not subject to a Williamson Act contract. There are no components of the proposed Project that could indirectly affect any Agricultural Preserves or Williamson Act-contracted lands within the Project vicinity. Therefore, Project impacts due to a conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve would be less-than-cumulatively considerable.

There are no lands within 300 feet of the Project site that are zoned for A-1, A-P, A-2, A-D, or C/V, and there are no lands subject to these or other agricultural zoning classifications within the Project vicinity. Therefore, impacts due to development of non-agricultural uses within 300 feet of agriculturally-zoned property would be less-than-cumulatively considerable.

There are no components of the proposed Project that could indirectly result in the conversion of nearby Farmland to non-agricultural uses, beyond the direct and indirect impacts to on-site Farmlands. As such, Project impacts due to such conversion would be less-than-cumulatively considerable.

There are no forest lands in the Project vicinity, and no lands in the Project vicinity are zoned for timberland, timberland production, or forest uses. Cumulatively-considerable impacts would not occur.

4.2.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Significant Direct and Cumulatively-Considerable Impact. The Project would result in the conversion of approximately 80.0 acres of “Farmland of Local Importance” to non-agricultural use. As previously indicated, between 2014 and 2016, Riverside County had a decline in “Important Farmlands” of approximately 0.9%. The Project would contribute towards the loss of “Important Farmland” within Riverside County because agricultural production on site would be permanently precluded with implementation of the proposed Project. This represents a significant impact of the proposed Project on both a direct and cumulatively-considerable basis.

Threshold b.: Less-than-Significant Impact. Due to distance to the nearest agriculturally-zoned property, there are no components of the Project that have the potential to adversely affect agricultural uses on the nearest agriculturally-zoned property. Therefore, the Project would not conflict with existing agricultural zoning, and impacts would be less than significant. There are no components of the proposed Project that could result in indirect impacts to off-site agricultural uses such that agricultural use of off-site properties would be adversely affected. Accordingly, Project impacts to existing agricultural uses would be less than significant. Additionally, the Project site is not subject to a Williamson Act contract and is not located within any County Agricultural Preserves, and there are no components of the proposed Project that have the potential to adversely



affect agricultural operations at the nearest agricultural preserve/Williamson Act-contracted lands. As such, Project impacts to agricultural preserves and Williamson Act-contracted lands would be less than significant.

Threshold c.: No Impact. There are no lands within 300 feet of the Project site that are zoned primarily for agricultural use, as defined by Ordinance No. 625. As such, the Project would not cause development of non-agricultural uses within 300 feet of agriculturally-zoned property, and no impact would occur.

Threshold d.: Less-than-Significant Impact. The Project would not result in any other changes to the existing environment that could result in the conversion of off-site Farmland to non-agricultural use, and impacts would be less than significant.

Thresholds e., f., and g.: No Impact. There are no forest lands in the Project vicinity, and no lands in the Project vicinity are zoned for timberland, timberland production, or forest uses. The Project would not result in the conversion of forest land to non-forest use. No impact would occur.

4.2.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- In the event that zoning changes are approved in the Project vicinity to establish new agriculturally-zoned lands as defined by Riverside County Ordinance No. 625, the provisions of Ordinance No. 625 would apply. Ordinance No. 625 requires that when lands are developed adjacent to properties zoned primarily for agricultural purposes (that support agricultural operations that have been in place for at least three years and not considered a nuisance operation at the time the operation began), future land buyers must be notified of any agricultural operations that are on-going in the area, and mandate that such agricultural uses shall not be the subject of nuisance complaints.

Mitigation

There are no feasible mitigation measures for impacts associated with converting Farmland to non-agricultural use.

On-site mitigation would not be feasible, as development of a light industrial and business park uses cannot co-exist with agricultural uses, and restricting a small portion of the land for agricultural uses would not be economically feasible for agricultural operations. Further, it would not be economically viable for the Project Applicant to reserve all or a portion of the Project site for agricultural uses, as reservation of the land would negatively affect the Project Applicant's rate of return on its investment. Agricultural uses also would be incompatible with development of the Project and other urbanized uses which exist or will exist in the future.



Off-site mitigation would also not be feasible. Available agricultural land within the general Project area is subject to the identical market conditions and challenges that other agricultural operations have faced before making the decision to cease operating or relocate; namely, market pressures related to urbanization, increasing expenses, and declining profitability. As discussed in the General Plan EIR (SCH No. 2009041065), similar agriculture operations either are in the process of converting to urbanized land uses, or are relatively small and surrounded by urban development on all sides. As development in Riverside County continues, these locations will become less viable for agriculture, and significant agricultural operations are not likely to continue. Therefore, off-site mitigation would be economically infeasible, or would be precluded due to the unavailability of appropriate mitigation land. Case law supports the finding that a Lead Agency need not require mitigation where the EIR noted the long-term trend in agricultural land conversion due to development pressures in the region and concluded that mitigation was not feasible (*Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, and *Cherry Valley Pass Acres and Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316). Accordingly, feasible mitigation is not available to reduce impacts associated with the conversion of approximately 80.0 acres of “Farmland of Local Importance” to non-agricultural use.

4.2.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold a.: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Feasible mitigation measures are not available for the Project’s conversion of approximately 80.0 acres of “Farmland of Local Importance” to non-agricultural use.

Although it may be possible in some circumstances for impacts to agricultural land to be partially mitigated through the acquisition of off-site properties and placing such properties into permanent agricultural easements (i.e., compensatory mitigation), in this case such compensatory mitigation does not meet any of the definitions of mitigation as provided by State CEQA Guidelines § 15370. Specifically, off-site mitigation would not result in an avoidance of the impact by limiting the Project’s scope (§ 15370[a]) and would not minimize impacts to agriculturally zoned property “by limiting the degree or magnitude of the Project and its implementation” (§ 15370[b]). Placing existing off-site agricultural lands into a conservation easement also would not rectify the Project’s impacts to agriculturally zoned land by “repairing, rehabilitating, or restoring the impacted environment” (§ 15370[c]), given that such a conservation easement would encompass lands that already are suitable for, if not actively being used for, agricultural production. Such mitigation also would not meet the definition of State CEQA Guidelines § 15370(d) by “reducing or eliminating the impact over time by preservation and maintenance operations during the life” of the Project. Finally, because no new agricultural lands would be created, off-site agricultural easements would not result in the replacement or establishment of “substitute resources or environments” (§ 15370[e]). Therefore, Riverside County finds that off-site mitigation for land containing important agricultural resources is not a viable form of mitigation pursuant to State CEQA Guidelines § 15370 (See also the discussion above in subsection 4.2.7 regarding the infeasibility of off-site mitigation).

Accordingly, a direct and cumulatively-considerable impact due to the conversion of Farmland to non-agricultural use would occur for which no feasible mitigation is available. Thus, impacts would be significant and unavoidable.



4.3 AIR QUALITY

This Subsection is based on a technical report prepared by ECORP, titled, “Air Quality & Greenhouse Gas Assessment, Renaissance Ranch Project” (herein, “AQA”), which is dated March 2021 and is included as Technical Appendix B to this EIR (ECORP, 2021a).

4.3.1 EXISTING CONDITIONS

Air quality in a region is determined by its topography, meteorology, and existing air pollutant sources. These factors are discussed below, along with the current regulatory structure that applies to the South Coast Air Basin (SCAB), which encompasses the Project site, pursuant to the regulatory authority of the South Coast Air Quality Management District (SCAQMD). Ambient air quality is commonly characterized by climate conditions, the meteorological influences on air quality, and the quantity and type of pollutants released. The air basin is subject to a combination of topographical and climatic factors that reduce the potential for high levels of regional and local air pollutants. The following subsections describe the pertinent characteristics of the air basin and provides an overview of the physical conditions affecting pollutant dispersion in the Project area. (ECORP, 2021a, p. 3)

A. South Coast Air Basin

The California Air Resources Board (CARB) divides the State into air basins that share similar meteorological and topographical features. The Project site lies in the SCAB, which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties and all of Orange County. The air basin is on a coastal plain with connecting broad valleys and low hills and is bounded by the Pacific Ocean on the southwest, with high mountains forming the remainder of the perimeter. (ECORP, 2021a, p. 3)

1. *Temperature and Precipitation*

The air basin is part of a semi-permanent high-pressure zone in the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. This usually mild weather pattern is interrupted infrequently by periods of extremely hot weather, winter storms, and Santa Ana winds. The annual average temperature varies little throughout the 6,645-square-mile SCAB, ranging from the low 60s to the high 80s, measured in degrees Fahrenheit (°F). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. (ECORP, 2021a, p. 4)

In contrast to a very steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all annual rains fall between November and April. Summer rainfall is normally restricted to widely scattered thundershowers near the coast, with slightly heavier shower activity in the east and over the mountains. (ECORP, 2021a, p. 3)

2. *Humidity*

Although the SCAB has a semiarid climate, the air near the earth’s surface is typically moist because of the presence of a shallow marine layer. Except for infrequent periods when dry, continental air is brought into the



SCAB by offshore winds, the “ocean effect” is dominant. Periods of heavy fog, especially along the coast, are frequent, and low clouds, often referred to as high fog, are a characteristic climatic feature. Annual average humidity is 70 percent at the coast and 57 percent in the eastern portions of the SCAB. (ECORP, 2021a, p. 3)

3. *Wind*

Wind patterns across the south coastal region are characterized by westerly or southwesterly onshore winds during the day and by easterly or northeasterly breezes at night. Wind speed is higher during the dry summer months than during the rainy winter. Between periods of wind, air stagnation may occur in both the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day. During the winter and fall, surface high-pressure systems over the SCAB, combined with other meteorological conditions, can result in very strong, downslope Santa Ana winds. These winds normally continue a few days before predominant meteorological conditions are reestablished. The mountain ranges to the east affect the diffusion of pollutants by inhibiting the eastward transport of pollutants. Air quality in the SCAB generally ranges from fair to poor and is similar to air quality in most of coastal Southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions. (ECORP, 2021a, p. 4)

4. *Inversions*

In conjunction with the two characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, two similarly distinct types of temperature inversions control the vertical depth through which pollutants are mixed. These inversions are the marine/subsidence inversion and the radiation inversion. The height of the base of the inversion at any given time is known as the “mixing height.” The combination of winds and inversions is a critical determinant leading to highly degraded air quality in the summer and generally good air quality in the winter in Riverside County. (ECORP, 2021a, p. 4)

B. Criteria Air Pollutants

Criteria air pollutants are defined as those pollutants for which the federal and state governments have established air quality standards for outdoor or ambient concentrations to protect public health with a determined margin of safety. Ozone (O₃), coarse particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}) are generally considered to be regional pollutants because they or their precursors affect air quality on a regional scale. Pollutants such as carbon monoxide (CO), nitrogen dioxide (NO₂), and sulfur dioxide (SO₂) are considered to be local pollutants because they tend to accumulate in the air locally. PM is also considered a local pollutant. Health effects commonly associated with criteria pollutants are summarized in Table 4.3-1, *Criteria Air Pollutants – Summary of Common Sources and Effects*. (ECORP, 2021a, p. 4)

- **Carbon Monoxide (CO).** CO in the urban environment is associated primarily with the incomplete combustion of fossil fuels in motor vehicles. CO combines with hemoglobin in the bloodstream and reduces the amount of oxygen that can be circulated through the body. High CO concentrations can cause headaches, aggravate cardiovascular disease, and impair central nervous system functions. CO



Table 4.3-1 Criteria Air Pollutants – Summary of Common Sources and Effects

Pollutant	Major Manmade Sources	Human Health & Welfare Effects
CO	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, effecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
NO ₂	A reddish-brown gas formed during fuel combustion for motor vehicles, energy utilities and industrial sources.	Respiratory irritant; aggravates lung and heart problems. Precursor to ozone and acid rain. Causes brown discoloration of the atmosphere.
O ₃	Formed by a chemical reaction between reactive organic gases (ROGs) and nitrous oxides (N ₂ O) in the presence of sunlight. Common sources of these precursor pollutants include motor vehicle exhaust, industrial emissions, solvents, paints and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield.
PM ₁₀ & PM _{2.5}	Power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles and others.	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility (haze).
SO ₂	A colorless, nonflammable gas formed when fuel containing sulfur is burned. Examples are refineries, cement manufacturing, and locomotives.	Respiratory irritant. Aggravates lung and heart problems. Can damage crops and natural vegetation. Impairs visibility.

(ECORP, 2021a, Table 2-1)

concentrations can vary greatly over comparatively short distances. Relatively high concentrations of CO are typically found near crowded intersections and along heavy roadways with slow moving traffic. Even under the most severe meteorological and traffic conditions, high concentrations of CO are limited to locations within relatively short distances (i.e., up to 600 feet or 185 meters) of the source. Overall CO emissions are decreasing as a result of the Federal Motor Vehicle Control Program, which has mandated increasingly lower emission levels for vehicles manufactured since 1973. CO levels in the SCAB are in compliance with the State and federal one- and eight-hour standards. (ECORP, 2021a, p. 5)

- Nitrogen Oxides (NO_x).** Nitrogen gas comprises about 80 percent of the air and is naturally occurring. At high temperatures and under certain conditions, nitrogen can combine with oxygen to form several different gaseous compounds collectively called nitric oxides (NO_x). Motor vehicle emissions are the main source of NO_x in urban areas. NO_x is very toxic to animals and humans because of its ability to form nitric acid with water in the eyes, lungs, mucus membrane, and skin. In animals, long-term exposure to NO_x increases susceptibility to respiratory infections, and lowering resistance to such diseases as pneumonia and influenza. Laboratory studies show that susceptible humans, such as asthmatics, who are exposed to high concentrations can suffer from lung irritation or possible lung damage. Precursors of NO_x, such as NO and NO₂, attribute to the formation of O₃ and PM_{2.5}. Epidemiological studies have also shown associations between NO₂ concentrations and daily mortality



from respiratory and cardiovascular causes and with hospital admissions for respiratory conditions. (ECORP, 2021a, pp. 5-6)

- **Ozone (O₃).** O₃ is a secondary pollutant, meaning it is not directly emitted. It is formed when volatile organic compounds (VOCs) or ROG and NO_x undergo photochemical reactions that occur only in the presence of sunlight. The primary source of ROG emissions is unburned hydrocarbons in motor vehicle and other internal combustion engine exhaust. NO_x forms as a result of the combustion process, most notably due to the operation of motor vehicles. Sunlight and hot weather cause ground-level O₃ to form. Ground-level O₃ is the primary constituent of smog. Because O₃ formation occurs over extended periods of time, both O₃ and its precursors are transported by wind and high O₃ concentrations can occur in areas well away from sources of its constituent pollutants. People with lung disease, children, older adults, and people who are active can be affected when O₃ levels exceed ambient air quality standards. Numerous scientific studies have linked ground-level O₃ exposure to a variety of problems including lung irritation, difficult breathing, permanent lung damage to those with repeated exposure, and respiratory illnesses. (ECORP, 2021a, p. 6)
- **Particulate Matter (PM).** Particulate matter includes both aerosols and solid particulates of a wide range of sizes and composition. Of concern are those particles smaller than or equal to 10 microns in diameter size (PM₁₀) and smaller than or equal to 2.5 microns in diameter (PM_{2.5}). Smaller particulates are of greater concern because they can penetrate deeper into the lungs than larger particles. PM₁₀ is generally emitted directly as a result of mechanical processes that crush or grind larger particles or form the resuspension of dust, typically through construction activities and vehicular travel. PM₁₀ generally settles out of the atmosphere rapidly and is not readily transported over large distances. PM_{2.5} is directly emitted in combustion exhaust and is formed in atmospheric reactions between various gaseous pollutants, including NO_x, sulfur oxides (SO_x) and VOCs. PM_{2.5} can remain suspended in the atmosphere for days and/or weeks and can be transported long distances. (ECORP, 2021a, p. 6)

The principal health effects of airborne PM are on the respiratory system. Short-term exposure of high PM_{2.5} and PM₁₀ levels are associated with premature mortality and increased hospital admissions and emergency room visits. Long-term exposure is associated with premature mortality and chronic respiratory disease. According to the U.S. Environmental Protection Agency (USEPA), some people are much more sensitive than others to breathing PM₁₀ and PM_{2.5}. People with influenza, chronic respiratory and cardiovascular diseases, and the elderly may suffer worse illnesses; people with bronchitis can expect aggravated symptoms; and children may experience decline in lung function due to breathing in PM₁₀ and PM_{2.5}. Other groups considered sensitive include smokers and people who cannot breathe well through their noses. Exercising athletes are also considered sensitive because many breathe through their mouths. (ECORP, 2021a, pp. 6-7)

- **Volatile Organic Compounds (VOCs).** VOCs are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is,



they do not react at the same speed or do not form O₃ to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to O₃, which is a criteria pollutant. The terms VOC and ROG (see below) interchangeably. Breathing VOCs can irritate the eyes, nose and throat, can cause difficulty breathing and nausea, and can damage the central nervous system as well as other organs. Some VOCs can cause cancer. Not all VOCs have all these health effects, though many have several.

- **Reactive Organic Compounds (ROGs).** Similar to VOC, ROGs are also precursors in forming O₃ and consist of compounds containing methane, ethane, propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and NO_x react in the presence of sunlight. ROGs are a criteria pollutant since they are a precursor to O₃, which is a criteria pollutant. The terms ROG and VOC are used interchangeably. Health effects associated with ROGs are similar to VOCs, as discussed above.

C. Toxic Air Contaminants (TACs)

In addition to the criteria pollutants discussed above, toxic air contaminants (TACs) are another group of pollutants of concern. TACs are considered either carcinogenic or noncarcinogenic based on the nature of the health effects associated with exposure to the pollutant. For regulatory purposes, carcinogenic TACs are assumed to have no safe threshold below which health impacts would not occur, and cancer risk is expressed as excess cancer cases per one million exposed individuals. Noncarcinogenic TACs differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis. (ECORP, 2021a, p. 7)

There are many different types of TACs, with varying degrees of toxicity. Sources of TACs include industrial processes such as petroleum refining and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust. Additionally, diesel engines emit a complex mixture of air pollutants composed of gaseous and solid material. The solid emissions in diesel exhaust are known as diesel particulate matter (DPM). In 1998, California identified DPM as a TAC based on its potential to cause cancer, premature death, and other health problems (e.g., asthma attacks and other respiratory symptoms). Those most vulnerable are children (whose lungs are still developing) and the elderly (who may have other serious health problems). Overall, diesel engine emissions are responsible for the majority of California's known cancer risk from outdoor air pollutants. Diesel engines also contribute to California's PM_{2.5} air quality problems. Public exposure to TACs can result from emissions from normal operations, as well as from accidental releases of hazardous materials during upset conditions. The health effects of TACs include cancer, birth defects, neurological damage, and death. (ECORP, 2021a, p. 7)

DPM differs from other TACs in that it is not a single substance but rather a complex mixture of hundreds of substances. Diesel exhaust is a complex mixture of particles and gases produced when an engine burns diesel fuel. DPM is a concern because it causes lung cancer; many compounds found in diesel exhaust are



carcinogenic. DPM includes the particle-phase constituents in diesel exhaust. The chemical composition and particle sizes of DPM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerate, decelerate), fuel formulations (high/low sulfur fuel), and the year of the engine. Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation, and diesel exhaust can cause coughs, headaches, light-headedness, and nausea. DPM poses the greatest health risk among the TACs; due to their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung. (ECORP, 2021a, p. 7)

DPM is emitted from both mobile and stationary sources. In California, on-road diesel-fueled engines contribute approximately 24 percent of the Statewide total, with an additional 71 percent attributed to other mobile sources such as construction and mining equipment, agricultural equipment, and transport refrigeration units. Stationary sources contribute about five percent of total DPM. It should be noted that CARB has developed several plans and programs to reduce diesel emissions such as the Diesel Risk Reduction Plan, the Statewide Portable Equipment Registration Program, and the Diesel Off-Road Reporting System. (ECORP, 2021a, p. 44)

Diesel exhaust and many individual substances contained in it (including arsenic, benzene, formaldehyde, and nickel) have the potential to contribute to mutations in cells that can lead to cancer. Long-term exposure to diesel exhaust particles poses the highest cancer risk of any TAC evaluated by the Office of Environmental Health Hazard Assessment (OEHHA). CARB estimates that about 70 percent of the cancer risk that the average Californian faces from breathing toxic air pollutants stems from diesel exhaust particles. (ECORP, 2021a, p. 44)

In its comprehensive assessment of diesel exhaust, OEHHA analyzed more than 30 studies of people who worked around diesel equipment including truck drivers, railroad workers, and equipment operators. The studies showed these workers were more likely to develop lung cancer than workers who were not exposed to diesel emissions. These studies provide strong evidence that long-term exposure to diesel exhaust increases the risk of lung cancer. Using information from OEHHA's assessment, CARB estimates that diesel particle levels measured in California's air in 2000 could cause 540 "excess" cancers in a population of one million people over a 70-year lifetime. Other researchers and scientific organizations, including the National Institute for Occupational Safety and Health (NIOSH), have calculated cancer risks from diesel exhaust similar to those developed by OEHHA and CARB. (ECORP, 2021a, p. 44)

Exposure to diesel exhaust can have immediate health effects. Diesel exhaust can irritate the eyes, nose, throat, and lungs, and it can cause coughs, headaches, lightheadedness, and nausea. In studies with human volunteers, diesel exhaust particles made people with allergies more susceptible to the materials to which they are allergic, such as dust and pollen. Exposure to diesel exhaust also causes inflammation in the lungs, which may aggravate chronic respiratory symptoms and increase the frequency or intensity of asthma attacks. (ECORP, 2021a, pp. 44-45)

Diesel engines are a major source of fine-particulate pollution. The elderly and people with emphysema, asthma, and chronic heart and lung disease are especially sensitive to fine-particulate pollution. Numerous



studies have linked elevated particle levels in the air to increased hospital admissions, emergency room visits, asthma attacks, and premature deaths among those suffering from respiratory problems. Because children's lungs and respiratory systems are still developing, they are also more susceptible than healthy adults to fine particles. Exposure to fine particles is associated with increased frequency of childhood illnesses and can also reduce lung function in children. In California, diesel exhaust particles have been identified as a carcinogen. (ECORP, 2021a, p. 45)

D. Ambient Air Quality

Ambient air quality at the Project site can be inferred from ambient air quality measurements conducted at nearby air quality monitoring stations. CARB maintains more than 60 monitoring stations throughout California. The Lake Elsinore-W Flint Street (506 West Flint Street, Lake Elsinore) air quality monitoring station, located approximately 6.5 miles southeast of the Project area, is the closest station to the site. The Lake Elsinore-W Flint Street monitoring station monitors ambient concentrations of O₃, PM_{2.5}, and PM₁₀. NO₂ and CO concentrations are monitored at the air basin level. Ambient emission concentrations will vary due to localized variations in emission sources and climate and should be considered "generally" representative of ambient concentrations in the development area. (ECORP, 2021a, pp. 7-8)

Table 4.3-2, *Summary of Ambient Air Quality Data*, summarizes the published data concerning O₃, PM₁₀, and PM_{2.5} since 2017 from the Lake Elsinore-W Flint Street monitoring station for each year that the monitoring data is provided. O₃, PM₁₀, and PM_{2.5} are the pollutant species most potently affecting the Project region. Table 4.3-2 also summarizes the published data concerning NO₂ and CO. (ECORP, 2021a, p. 8)

The USEPA and CARB designate air basins or portions of air basins and counties as being in "attainment" or "nonattainment" for each of the criteria pollutants. Areas that do not meet the standards are classified as nonattainment areas. The National Ambient Air Quality Standards (NAAQS) (other than O₃, PM₁₀, PM_{2.5}, and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. The NAAQS for O₃, PM₁₀, and PM_{2.5} are based on statistical calculations over one- to three-year periods, depending on the pollutant. The California Ambient Air Quality Standards (CAAQS) are not to be exceeded during a three-year period. The attainment status for the SCAB is shown in Table 4.3-3, *Attainment Status of Criteria Pollutants in the Western Riverside County Portion of South Coast Air Basin*. (ECORP, 2021a, pp. 8-9)

The determination of whether an area meets the State and federal standards is based on air quality monitoring data. Some areas are unclassified, which means there is insufficient monitoring data for determining attainment or nonattainment. Unclassified areas are typically treated as being in attainment. Because the attainment/nonattainment designation is pollutant-specific, an area may be classified as nonattainment for one pollutant and attainment for another. Similarly, because the State and federal standards differ, an area could be classified as attainment for the federal standards of a pollutant and as nonattainment for the State standards of the same pollutant. The portion of the SCAB that includes the Project site is designated as a nonattainment area for the federal O₃ and PM_{2.5} standards and is also a nonattainment area for the state standards for O₃, PM₁₀, and PM_{2.5}. (ECORP, 2021a, p. 9)



Table 4.3-2 Summary of Ambient Air Quality Data

Pollutant Standards	2017	2018	2019
O₃			
Max 1-hour concentration (ppm)	0.121	0.116	0.108
Max 8-hour concentration (ppm) (state/federal)	0.098 / 0.098	0.096 / 0.095	0.089 / 0.089
Number of days above 1-hour standard (state/federal)	23 / 0	16 / 0	4 / 0
Number of days above 8-hour standard (state/federal)	56 / 54	31 / 30	31 / 28
NO₂			
Max 1-hour concentration (ppb) (state/federal)	65.0 / 65.1	55.0 / 55.4	56.0 / 56.0
Number of days above 1-hour standard (state/federal)	0 / 0	0 / 0	0 / 0
CO			
Max concentration (ppm) (state/federal)	3.58 / 3.58	4.67 / 4.67	3.96 / 3.96
Number of days above standard (state/federal)	0 / 0	0 / 0	0 / 0
PM₁₀			
Max 24-hour concentration (µg/m ³) (state/federal)	* / 134.1	* / 105.3	* / 93.8
Number of days above 24-hour standard (state/federal)	* / 0	* / 0	* / *
PM_{2.5}			
Max 24-hour concentration (µg/m ³) (state/federal)	27.2 / *	31.3 / *	17.6 / *
Number of days above federal 24-hour standard	*	*	*

Source: CARB 2020a

CO values are specific to the years 2010, 2011, and 2012, the latest available data for the South Coast Air Basin.

µg/m³ = micrograms per cubic meter; ppm = parts per million; ppb = parts per billion

* = Insufficient data available

(ECORP, 2021a, Table 2-2)

Table 4.3-3 Attainment Status of Criteria Pollutants in the Western Riverside County Portion of South Coast Air Basin

Pollutant	State Designation	Federal Designation
O ₃	Nonattainment	Nonattainment
PM ₁₀	Nonattainment	Attainment
PM _{2.5}	Nonattainment	Nonattainment
CO	Attainment	Unclassified/Attainment
NO ₂	Attainment	Unclassified/Attainment
SO ₂	Attainment	Unclassified/Attainment

(ECORP, 2021a, Table 2-3)



E. Sensitive Receptors

Sensitive receptors are defined as facilities or land uses that include members of the population who are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. (ECORP, 2021a, p. 9)

The Project would entail onsite and offsite improvements. The nearest sensitive receptors to the Project site are rural residences located on Horsethief Canyon Road as well as residences located in the Horsethief Canyon Ranch Community located directly adjacent to the southern and western Project site boundary. The installation of the proposed offsite water line would occur directly adjacent to a rural residence located on Horsethief Canyon Road. (ECORP, 2021a, p. 9)

4.3.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations governing air quality emissions.

A. Federal Regulations

1. Federal Clean Air Act

The Clean Air Act (CAA; 42 U.S.C. § 7401 et seq.) is the comprehensive federal law that regulates air emissions from stationary and mobile sources. Among other things, this law authorizes Environmental Protection Agency (EPA) to establish National Ambient Air Quality Standards (NAAQS) to protect public health and public welfare and to regulate emissions of hazardous air pollutants, which include O₃, CO, NO_x, SO₂, PM₁₀, PM_{2.5}, and lead. (EPA, n.d.)

One of the goals of the CAA was to set and achieve NAAQS in every state by 1975 in order to address the public health and welfare risks posed by certain widespread air pollutants. The setting of these pollutant standards was coupled with directing the states to develop state implementation plans (SIPs), applicable to appropriate industrial sources in the state, in order to achieve these standards. The CAA was amended in 1977 and 1990 primarily to set new goals (dates) for achieving attainment of NAAQS since many areas of the country had failed to meet the deadlines. (EPA, n.d.)

The sections of the federal CAA most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions address the urban air pollution problems of ozone (smog), carbon monoxide (CO), and particulate matter (PM₁₀). Specifically, it clarifies how areas are designated and re-designated "attainment." It also allows EPA to define the boundaries of "nonattainment" areas: geographical areas whose air quality does not meet Federal air quality standards designed to protect public health. (EPA, n.d.) Mobile source emissions are regulated in accordance with the



CAA Title II provisions. These standards are intended to reduce tailpipe emissions of hydrocarbons, CO, and NO_x on a phased-in basis that began in model year 1994. Automobile manufacturers also are required to reduce vehicle emissions resulting from the evaporation of gasoline during refueling. These provisions further require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas. (EPA, n.d.)

Section 112 of the Clean Air Act addresses emissions of hazardous air pollutants. Prior to 1990, CAA established a risk-based program under which only a few standards were developed. The 1990 Clean Air Act Amendments revised Section 112 to first require issuance of technology-based standards for major sources and certain area sources. "Major sources" are defined as a stationary source or group of stationary sources that emit or have the potential to emit 10 tons per year or more of a hazardous air pollutant or 25 tons per year or more of a combination of hazardous air pollutants. An "area source" is any stationary source that is not a major source. (EPA, n.d.)

For major sources, Section 112 requires that EPA establish emission standards that require the maximum degree of reduction in emissions of hazardous air pollutants. These emission standards are commonly referred to as "maximum achievable control technology" or "MACT" standards. Eight years after the technology-based MACT standards are issued for a source category, EPA is required to review those standards to determine whether any residual risk exists for that source category and, if necessary, revise the standards to address such risk. (EPA, n.d.)

2. National Emissions Standards for Hazardous Air Pollutants (NESHAPS) Program

National Emission Standards for Hazardous Air Pollutants (NESHAP) are stationary source standards for hazardous air pollutants. Hazardous air pollutants (HAPs) are those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects. The EPA develops national enforcement initiatives that focus on significant environmental risks and noncompliance patterns. For Fiscal Years 2014 to 2016, the Cutting Hazardous Air Pollutants National Initiatives Strategy focuses on categories of sources that emit HAPs. (EPA, n.d.)

Sources subject to NESHAPs are required to perform an initial performance test to demonstrate compliance. To demonstrate continuous compliance, sources are generally required to monitor control device operating parameters which are established during the initial performance test. Sources may also be required to install and operate continuous emission monitors to demonstrate compliance. Consistent with EPA's Clean Air Act Stationary Source Compliance Monitoring Strategy, NESHAP sources that meet the Clean Air Act definition of "major source" generally receive a full compliance evaluation by the state or regional office at least once every two years. (EPA, n.d.)



B. State Regulations

1. California Clean Air Act (CCAA)

The California Clean Air Act (CCAA) establishes numerous requirements for district plans to attain state ambient air quality standards for criteria air contaminants. The CCAA mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the State's ambient air quality standards, the California Ambient Air Quality Standards (CAAQS), by the earliest practical date. The CARB established the CAAQS for all pollutants for which the federal government has NAAQS and, in addition, established standards for sulfates, visibility, hydrogen sulfide, and vinyl chloride. Generally, the CAAQS are more stringent than the NAAQS. For districts with serious air pollution, its attainment plan should include the following: no net increase in emissions from new and modified stationary sources; and best available retrofit technology for existing sources. (SCAQMD, n.d.)

2. Air Toxic Hot Spots Act

The Air Toxic Hot Spots Act (Health & Safety Code §§ 44300, et seq.) requires facilities emitting specified quantities of pollutants to conduct risk assessments describing the health impacts to neighboring communities created by their emissions of numerous specified hazardous compounds. If the district determines the health impact to be significant, neighbors must be notified. In addition, state law requires the facility to develop and implement a plan to reduce the health impacts to below significance, generally within five years. Additional control requirements for hazardous emissions from specific industries are established by the state and enforced by districts. (SCAQMD, n.d.)

3. Air Quality Management Planning

The California Air Resources Board (CARB) and local air districts throughout the State are responsible for developing clean air plans to demonstrate how and when California will attain air quality standards established under both the CAA and CCAA. For the areas within California that have not attained air quality standards, CARB works with local air districts to develop and implement State and local attainment plans. In general, attainment plans contain a discussion of ambient air quality data and trends; a baseline emissions inventory; future year projections of emissions, which account for growth projections and already adopted control measures; a comprehensive control strategy of additional measures needed to reach attainment; an attainment demonstration, which generally involves complex modeling; and contingency measures. Plans may also include interim milestones for progress toward attainment. Air quality planning activities undertaken by CARB also include the development of policies, guidance, and regulations related to State and federal ambient air quality standards; coordination with local agencies on transportation plans and strategies; and providing assistance to local districts and transportation agencies. (CARB, 2012)

4. California Air Resources Board Rules

The CARB enforces rules related to air pollutant emissions in the State of California. Rules with applicability to the Project include, but are not limited to, those listed below.



- CARB Rule 2480 (13 CCR 2480): Airborne Toxics Control Measure to Limit School Bus Idling and Idling at Schools, which limits nonessential idling for commercial trucks and school buses within 100 feet of a school.
- CARB Rule 2485 (13 CCR 2485): Airborne Toxic Control Measure to Limit Diesel-Fuel Commercial Vehicle Idling, which limits nonessential idling to five minutes or less for commercial trucks.
- CARB Rule 2449 (13 CCR 2449): In-Use Off-Road Diesel Idling Restricts, which limits nonessential idling to five minutes or less for diesel-powered off-road equipment.

5. *South Coast Air Quality Management District Rules*

The South Coast Air Quality Management District (SCAQMD) enforces rules related to air pollutant emissions in the SCAB. Rules with applicability to the Project include, but are not limited to, those listed below.

- SCAQMD Rule 201: Permit to Construct
- SCAQMD Rule 402: Nuisance Odors
- SCAQMD Rule 403: Fugitive Dust
- SCAQMD Rule 431.2: Low Sulfur Fuel
- SCAQMD Rule 1113: Architectural Coatings
- SCAQMD Rule 1186: PM₁₀ Emissions from Paved and Unpaved Roads, and Livestock Operations

6. *Truck & Bus Regulation*

Under the Truck and Bus Regulation, adopted by CARB in 2008, all diesel truck fleets operating in California are required to adhere to an aggressive schedule for upgrading and replacing heavy-duty truck engines. Older, more polluting trucks are required to be replaced first, while trucks that already have relatively clean engines are not required to be replaced until later. Pursuant to the Truck and Bus Regulation, all pre-1994 heavy trucks (trucks with a gross vehicle weight rating greater than 26,000 pounds) were to be removed from service on California roads by 2015. Between 2015 and 2020, pre-2000 heavy trucks will be equipped with PM filters and will be upgraded or replaced with an engine that meets 2010 emissions standards. The upgrades/replacements will occur on a rolling basis based on model year. By 2023, all heavy trucks operating on California roads must have engines that meet 2010 emissions standards. Lighter trucks (those with a gross vehicle weight rating of 14,001 to 26,000 pounds) must adhere to a similar schedule, and will all be replaced by 2020. (CARB, n.d.)

7. *Advanced Clean Truck Regulation*

In June, 2020, CARB adopted a new Rule requiring truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California will be required to be zero-emission. Manufacturers who certify Class 2b-8 chassis or complete vehicles with combustion engines would be required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales would need to be 55% of Class 2b – 3 truck sales, 75% of Class 4 – 8 straight truck sales, and 40% of truck tractor sales. CARB reports that as of 2020, most commercially-available models of zero-emission vans, trucks and buses operate less than 100



miles per day. Commercial availability of electric-powered long-haul trucks is very limited. However, as technology advances over the next 20 years, zero-emission trucks will become suitable for more applications, and several truck manufacturers have announced plans to introduce market ready zero-emission trucks in the future. (CARB, 2020)

8. *Senate Bill 535 – Disadvantaged Communities*

Senate Bill 535 (“SB 535”; De León, Chapter 830, 2012) recognizes the potential vulnerability of low-income and disadvantaged communities to poor air quality. Disadvantaged communities in California are specifically targeted for investment of proceeds from the State’s cap-and-trade program. These investments are aimed at improving public health, quality of life and economic opportunity in California’s most burdened communities at the same time reducing pollution that causes climate change. Authorized by the California Global Warming Solutions Act of 2006 (AB 32), the State’s cap-and-trade program is one of several strategies that California uses to reduce greenhouse gas emissions that cause climate change. The funds must be used for programs that further reduce emissions of greenhouse gases. SB 535 requires that 25 percent of the proceeds from the Greenhouse Gas Reduction Fund go to projects that provide a benefit to disadvantaged communities. The California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)). In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25 percent of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 3.0 (CalEnviroScreen). (OEHHA, 2017)

9. *Senate Bill 1000 – Environmental Justice in Local Land Use Planning*

In an effort to address the inequitable distribution of pollution and associated health effects in low-income communities and communities of color, the Legislature passed and Governor Brown signed Senate Bill 1000 (SB 1000) in 2016, requiring local governments to identify environmental justice communities (called “disadvantaged communities”) in their jurisdictions and address environmental justice in their general plans. This new law has several purposes, including to facilitate transparency and public engagement in local governments’ planning and decision-making processes, reduce harmful pollutants and the associated health risks in environmental justice communities, and promote equitable access to health-inducing benefits, such as healthy food options, housing, public facilities, and recreation. SB 1000 requires environmental justice elements to identify objectives and policies to reduce unique or compounded health risks in disadvantaged communities. Generally, environmental justice elements will include policies to reduce the community’s exposure to pollution through air quality improvement. SB 1000 affirms the need to integrate environmental justice principles into the planning process to prioritize improvements and programs that address the needs of disadvantaged communities. (OAG, n.d.)



10. ***Assembly Bill 617***

Assembly Bill 617 (AB 617) was enacted into law in 2017, and relates to criteria air pollutants and toxic air contaminants from sources other than vehicles. In response to AB 617, the California Air Resources Board (CARB) established the Community Air Protection Program (CAPP or Program). The Program’s focus is to reduce exposure in communities most impacted by air pollution. Communities around the State are working together to develop and implement new strategies to measure air pollution and reduce health impacts. This first-of-its-kind statewide effort includes community air monitoring and community emissions reduction programs. In addition, the Legislature appropriated funding to support early actions to address localized air pollution through targeted incentive funding to deploy cleaner technologies in these communities, as well as grants to support community participation in the AB 617 process. AB 617 also includes new requirements for accelerated retrofit of pollution controls on industrial sources, increased penalty fees, and greater transparency and availability of air quality and emissions data, which will help advance air pollution control efforts throughout the State. This new effort provides an opportunity to continue to enhance air quality planning efforts and better integrate community, regional, and State level programs to provide clean air. (CARB, n.d.)

C. ***Regional Regulations***

1. ***Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)***

The Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura) and 191 cities in an area covering more than 38,000 square miles.

SCAG’s *2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS)*, also referred to as *Connect SoCal*, develops long-range regional transportation plans including a sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations and other plans for the region. The RTP/SCS provides objectives for meeting air pollution emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. The Subregional Sustainable Communities Strategies identifies the Project Site as being located in an area with a “Standard Suburban” land use pattern, which is defined as auto-oriented development with a minimal mix of land uses.

The *Goods Movement Technical Report* of *Connect SoCal* recognizes that the SCAG region is the premier trade gateway for the United States. *Connect SoCal* acknowledges that the SCAG region has witnessed continued growth for warehousing, distribution, cold storage and truck terminal facilities, with a majority of the growth for national and regional distribution facilities occurring in the Inland Empire. Through *Connect*



SoCal, SCAG is working on various regional strategies to maintain the SCAG region as an important trade gateway while addressing regional transportation efficiency and environmental sustainability.

2. *Riverside County Climate Action Plan (CAP)*

The County of Riverside Climate Action Plan (CAP), which was adopted in December 2015 and most recently updated in November 2019, was designed under the premise that the County of Riverside, and the community it represents, is uniquely capable of addressing emissions associated with sources under Riverside County’s jurisdiction, and that Riverside County’s emission reduction efforts should coordinate with the state strategies of reducing emissions in order to accomplish these reductions in an efficient and cost-effective manner. The 2019 CAP Update establishes GHG emission reduction programs and regulations that correlate with and support evolving state GHG emissions reduction goals and strategies. The CAP Update includes reduction targets for year 2030 and year 2050. These reduction targets require the County to reduce emissions by at least 525,511 MTCO₂e/yr below the Adjusted Business As Usual (ABAU) scenario by 2030 and at least 2,982,948 MTCO₂e/yr below the ABAU scenario by 2050. To evaluate consistency with the CAP Update, the County has implemented CAP Update Screening Tables (Screening Tables) to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated in development projects. To this end, the Screening Tables establish categories of GHG Implementation Measures. Under each Implementation Measure category, mitigation or project design features (collectively “features”) are assigned point values that correspond to the minimum GHG emissions reduction that would result from each feature. Projects that yield at least 100 points are considered to be consistent with the GHG emissions reduction quantities anticipated in the County’s GHG Technical Report and support the GHG emissions reduction targets established under the CAP Update. The potential for such projects to generate direct or indirect GHG emissions that would result in a significant impact on the environment; or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG would be considered less than significant. (ECORP, 2021a, p. 60)

3. *Riverside County General Plan Air Quality Element*

The County General Plan Air Quality Element identifies goals, policies and programs that are meant to balance the County’s actions regarding land use, circulation, and other issues with their potential effects on air quality. The Air Quality Element addresses ambient air quality standards set forth by the USEPA and CARB. The Air Quality Element contains policies designed to establish a regional basis for improving air quality. The following relevant and applicable policies from the County’s Air Quality Element have been identified for the Project:

AQ 1.1: Promote and participate with regional and local agencies, both public and private, to protect and improve air quality.

AQ 1.4: Coordinate with the SCAQMD and MDAQMD to ensure that all elements of air quality plans regarding reduction of air pollutant emissions are being enforced.

AQ 2.1: The County land use planning efforts shall assure that sensitive receptors are separated and protected from polluting point sources to the greatest extent possible.



AQ 2.2: Require site plan designs to protect people and land uses sensitive to air pollution through the use of barriers and/or distance from emissions sources when possible.

AQ 2.3: Encourage the use of pollution control measures such as landscaping, vegetation and other materials, which trap particulate matter or control pollution.

AQ 3.1: Allow the market place, as much as possible, to determine the most economical approach to relieve congestion and cut emissions.

AQ 3.3: Encourage large employers and commercial/industrial complexes to create Transportation Management Associations.

AQ 4.1: Require the use of all feasible building materials/methods which reduce emissions.

AQ 4.2: Require the use of all feasible efficient heating equipment and other appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces and boiler units.

AQ 4.6: Require stationary air pollution sources to comply with applicable air district rules and control measures.

AQ 4.7: To the greatest extent possible, require every project to mitigate any of its anticipated emissions which exceed allowable emissions as established by the SCAQMD, MDAQMD, SCAB, the Environmental Protection Agency and the California Air Resources Board.

AQ 4.9: Require compliance with SCAQMD Rules 403 and 403.1, and support appropriate future measures to reduce fugitive dust emanating from construction sites.

4. *Riverside County Board of Supervisors Good Neighbor Policy for Logistics and Warehouse/ Distribution Uses*

The County of Riverside Board of Supervisors *Good Neighbor Policy for Logistics and Warehouse/ Distribution Uses* (“Good Neighbor Policy”) provides a framework through which large-scale logistics and warehouse projects, such as that proposed by the Project, can be designed and operated in a way that lessens their impact on surrounding communities and the environment. It is meant to apply Best Management Practices to help minimize potential impacts to sensitive receptors and is intended to be used in conjunction with the County’s Land Use Ordinance, which provides development requirements for said projects. This policy provides a series of development and operational criteria applicable to logistics and warehouse projects that include any building larger than 250,000 square feet in size that are implemented to supplement project-level mitigation measures in order to further reduce impacts related to logistics and warehousing development and operations. A complete list of applicable Good Neighbor Policy requirements is included in subsection 2.2.3 of the Project’s AQA (*Technical Appendix B*). It should be noted that the currently-proposed Project consists of applications for a General Plan Amendment, Specific Plan Amendment, and Change of Zone, and no site-specific development applications (e.g., plot plans, etc.) are proposed at this time. As the Good Neighbor Policy requirements relate to site-specific development and construction activities, the requirements of the Good Neighbor Policy would be enforced as part of the County’s review of future site-specific development applications, such as implementing plot plans.



4.3.3 BASIS FOR DETERMINING SIGNIFICANCE

A. Thresholds of Significance

Section III of Appendix G to the State CEQA Guidelines addresses typical adverse effects to air quality, and includes the following threshold questions to evaluate the Project's impacts due to air quality emissions (OPR, 2018a):

- Would the Project conflict with or obstruct implementation of the applicable air quality plan?
- Would the Project 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?
- Would the Project expose sensitive receptors to substantial pollutant concentrations?
- Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section II of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact due to air quality emissions if construction and/or operation of the Project would:

- a. *Conflict with or obstruct implementation of the applicable air quality plan;*
- 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;*
- c. *Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations; or*
- d. *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts due to air quality emissions.

B. SCAQMD Regional Thresholds

The significance criteria established by the applicable air quality management or air pollution control district (SCAQMD) may be relied upon to make the above determinations. According to the SCAQMD, an air quality impact is considered significant if the proposed Project would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established thresholds of significance for air quality



for construction and operational activities of land use development projects such as that proposed, as shown in Table 4.3-4, *SCAQMD Regional Significance Thresholds (Pounds per Day)*. (ECORP, 2021a, p. 20)

Table 4.3-4 SCAQMD Regional Significance Thresholds (Pounds per Day)

Air Pollutant	Construction Activities	Operations
Reactive Organic Gas	75	55
Carbon Monoxide	550	550
Nitrogen Oxide	100	55
Sulfur Oxide	150	150
Coarse Particulate Matter	150	150
Fine Particulate Matter	55	55

(ECORP, 2021a, Table 2-4)

By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project’s individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project’s individual emissions exceed its identified significance thresholds, the project would be cumulatively considerable. Projects that do not exceed significance thresholds would not be considered cumulative considerable. (ECORP, 2021a, p. 21)

C. SCAQMD Localized Significance Thresholds

In addition to regional significance thresholds, the SCAQMD developed localized significance thresholds (LSTs) for emissions of NO₂, CO, PM₁₀, and PM_{2.5} generated at new development sites (offsite mobile source emissions are not included in the LST analysis protocol). LSTs represent the maximum emissions that can be generated at a Project site without expecting to cause or substantially contribute to an exceedance of the most stringent national or State ambient air quality standards. LSTs are based on the ambient concentrations of that pollutant within the Project source receptor area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. LST analysis for construction is applicable for all projects that disturb five acres or less on a single day. The Project site is located within SCAQMD SRA 25 (Lake Elsinore). Table 4.3-5, *Localized Significance Thresholds at or within 25 Meters of a Sensitive Receptor*, shows the LSTs for a one-acre, two-acre, and five-acre project site in SRA 25 with sensitive receptors located within 25 meters of the Project site. (ECORP, 2021a, p. 21)



Table 4.3-5 Localized Significance Thresholds at or within 25 Meters of a Sensitive Receptor

Project Size	Pollutant (pounds per day Construction/Operations)			
	NO ₂	CO	PM ₁₀	PM _{2.5}
1 Acre	162 / 162	750 / 750	4 / 1	3 / 1
2 Acres	234 / 234	1,100 / 1,100	7 / 2	4 / 1
5 Acres	371 / 371	1,965 / 1,965	13 / 4	8 / 2

(ECORP, 2021a, Table 2-5)

D. Toxic Air Contaminant Thresholds

The SCAQMD regulates levels of air toxics through a permitting process that covers both construction and operation. The SCAQMD has adopted Rule 1401 for both new and modified sources that use materials classified as air toxics. The SCAQMD CEQA Guidelines for permit processing consider the following types of projects significant: (ECORP, 2021a, p. 21)

- Any project involving the emission of a carcinogenic or toxic air contaminant identified in SCAQMD Rule 1401 that exceeds the maximum individual cancer risk of 10 in one million if the project is constructed with best available control strategy for toxics (T-BACT) using the procedures in SCAQMD Rule 1401. (ECORP, 2021a, p. 21)
- Any project that could accidentally release an acutely hazardous material or routinely release a toxic air contaminant posing an acute health hazard above an acute or chronic hazard index of 1.0. (ECORP, 2021a, p. 22)

E. Methodology

Air quality impacts were assessed in accordance with methodologies recommended by the County of Riverside General Plan and the SCAQMD. Onsite construction-related (including worker commutes and vendors), area source, and energy source emissions were modeled using the California Emissions Estimator Model (CalEEMod), version 2016.3.2. Construction haul truck emissions and operational mobile source emissions were calculated with the 2017 version of the Emission FACtor model (EMFAC) developed by CARB. Construction-generated air pollutant emissions, including proposed offsite improvements, were primarily calculated using CalEEMod model defaults for Riverside County. Additionally, construction-related DPM concentrations and associated dispersion generated from both off-road equipment and construction haul truck were modeled using the HARP2 modeling program provided by CARB, with regulatory default settings, to perform the dispersion and health risk modeling for purposes of analysis. Refer to subsection 2.3.3 of the Project’s AQA (*Technical Appendix B*) for a complete discussion of the methodologies employed to estimate the Project’s air quality emissions. (ECORP, 2021a, pp. 22-23)



4.3.4 IMPACT ANALYSIS

Threshold a.: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

As part of its enforcement responsibilities, the USEPA requires each state with nonattainment areas to prepare and submit a SIP that demonstrates the means to attain the federal standards. The SIP must integrate federal, State, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under state law, the CCAA requires an air quality attainment plan to be prepared for areas designated as nonattainment with regard to the NAAQS and CAAQS. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date. (ECORP, 2021a, p. 41)

The Project site is located within the SCAB, which is under the jurisdiction of the SCAQMD. The SCAQMD is required, pursuant to the federal CAA, to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. In order to reduce such emissions, the SCAQMD drafted the 2016 AQMP. The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state (California) and national air quality standards. The 2016 AQMP is a regional and multi-agency effort including the SCAQMD, CARB, Southern California Association of Governments (SCAG), and the USEPA. The plan's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. (SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans.) The Project is subject to the SCAQMD's AQMP. (ECORP, 2021a, p. 41)

According to the SCAQMD, in order to determine consistency with SCAQMD's air quality planning two main criteria must be addressed.

- ***Consistency Criterion No. 1: The proposed Project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.***

As discussed under the analysis of Threshold b., although Project-related construction activities have the potential to exceed the SCAQMD Regional Threshold of significance for NO_x, implementation of Mitigation Measure MM 4.3-1 and MM 4.3-2 would ensure that criteria pollutant emissions generated during construction of the proposed Project would be reduced to below the SCAQMD regional thresholds for NO_x. However, under long-term operational conditions the Project has the potential to exceed the SCAQMD Regional Thresholds of significance for ROG and NO_x. As discussed under the analysis of Threshold b., the predominate source of these pollutant emissions would be due to mobile sources, primarily from heavy-duty trucks. Mobile emission cannot be regulated by the County. Therefore, the proposed Project would have the potential to cause or affect a violation of the ambient air quality standards.



Additionally, because the Project would result in ROG and NO_x emissions that exceed the SCAQMD regional significance threshold during long-term operations, it could potentially delay the timely attainment of the O₃ air quality standard and/or the AQMP emission reduction requirements. As such, the Project has the potential to conflict with the AQMP according to this criterion. (ECORP, 2021a, p. 41)

- **Consistency Criterion No. 2:** *The Project will exceed the assumptions in the AQMP based on the years of Project build-out phase.*

With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it is important to recognize that air quality planning within the SCAB focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining Project consistency focuses on whether or not the Proposed Project exceeds the assumptions utilized in preparing the forecasts presented its air quality planning documents. Determining whether or not a project exceeds the assumptions reflected in the 2016 AQMP involves the evaluation of the three criteria outlined below. The following discussion provides an analysis of each of these criteria. (ECORP, 2021a, p. 42)

- **Consistency Criterion No. 2a:** *Would the project be consistent with the population, housing, and employment growth projections utilized in the preparation of the 2016 AQMP?*

A project is consistent with regional air quality planning efforts in part if it is consistent with the population, housing, and employment assumptions that were used in the development of the SCAQMD air quality plans. Generally, three sources of data form the basis for the projections of air pollutant emissions in Riverside County. Specifically, SCAG's Growth Management Chapter of the Regional Comprehensive Plan and Guide (RCPG) provides regional population forecasts for the region and SCAG's 2020 RTP/SCS provides socioeconomic forecast projections of regional population growth. The County of Riverside General Plan is referenced by SCAG in order to assist forecasting future growth in the unincorporated portions of the County. (ECORP, 2021a, p. 42)

The proposed Project is not consistent with the land use designation and development density presented in the County General Plan. The Project is seeking a General Plan Amendment (GPA) to modify the land use designations for the Project site in order to accommodate the land uses proposed as part of Amendment No. 1 to the Renaissance Ranch Specific Plan (SP 333A1). Currently, the County General Plan and the Elsinore Area Plan (EAP) designate the Project site for "Medium Density Residential (MDR)" land uses. The proposed GPA would amend the General Plan and EAP land use designations to reflect the proposed land uses, which would include "Light Industrial (LI)," "Business Park (BP)," "Open Space – Conservation (OS-C)," and "Open Space – Conservation Habitat" land uses. It is noted that the Project would result in the creation of a substantial number of jobs that would serve to assist Riverside County in improving its jobs-housing balance, thereby potentially shortening commute lengths of residents living in the unincorporated communities of the County yet traveling substantial distances to job centers outside of the County. Nonetheless, the proposed Project is not consistent with the types, intensity, and patterns of land use envisioned for the site vicinity in the General Plan and EAP. As a result, the Project could potentially



conflict with the land use assumptions used by SCAQMD to develop the 2016 AQMP. The County's population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the County, and these are used by SCAG in all phases of implementation and review. Additionally, as the SCAQMD has incorporated these same projections into their air quality planning efforts, it can be concluded that the proposed Project could be inconsistent with the projections. Therefore, the proposed Project would not be considered consistent with the population, housing, and employment growth projections utilized in the preparation of SCAQMD's air quality plans. (ECORP, 2021a, pp. 42-43)

- **Consistency Criterion No. 2b:** *Would the project implement all feasible air quality mitigation measures?*

In order to further reduce emissions, the Project would be required to comply with emission reduction measures promulgated by the SCAQMD, such as SCAQMD Rules 201, 402, 403, 1113, and 1401. SCAQMD Rule 402 prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. SCAQMD Rule 403 requires fugitive dust sources to implement Best Available Control Measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. SCAQMD Rule 403 is intended to reduce PM₁₀ emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. SCAQMD 1113 requires manufacturers, distributors, and end-users of architectural and industrial maintenance coatings to reduce ROG emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories. Rule 201 requires a "Permit to Construct" prior to the installation of any equipment "the use of which may cause the issuance of air contaminants..." Rule 1401 requires new source review of any new, relocated, or modified permit units that emit TACs. Additionally, as discussed under the analysis of Threshold b., mitigation measures are identified herein to reduce the Project's air quality emissions to the maximum feasible extent, including requirements to implement the County Good Neighbor Policy provisions. The County Good Neighbor Policy provisions are required throughout all future construction of the Specific Plan. As such, the proposed Project meets this consistency criterion. (ECORP, 2021a, p. 43)

- **Consistency Criterion No. 2c:** *Would the project be consistent with the land use planning strategies set forth by SCAQMD air quality planning efforts?*

The AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. For the reasons discussed above, the Project is not consistent with the land use designation and development density presented in the County of Riverside's General Plan and therefore could potentially exceed or otherwise conflict with the population or job growth projections used by the SCAQMD to develop the AQMP. On this basis, the Project would not be consistent with Criterion 2. (ECORP, 2021a, pp. 43-44)



In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of a project on air quality. The Project would result in operational emissions which would exceed regional significance thresholds potentially hindering the region's ability to meet State and federal air quality standards, thereby conflicting with Criterion 1. Further, the Project could be inconsistent with Criterion 2. Thus, the Project would conflict with the SCAQMD 2016 AQMP, and impacts would be significant on both a direct and cumulatively-considerable basis

Threshold b.: Would the Project 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?

A. Project Operations Criteria Air Quality Emissions

1. Regional Construction Significance Analysis

Construction-generated emissions are temporary and short-term but have the potential to represent a significant air quality impact. Four basic sources of short-term emissions would be generated with construction of the proposed Project: operation of the construction vehicles (i.e., excavators, trenchers, dump trucks), the creation of fugitive dust during clearing and grading, the use of asphalt or other oil-based substances during paving activities, and the application of paint. Construction activities such as excavation and grading operations, construction vehicle traffic, and wind blowing over exposed soils would generate exhaust emissions and fugitive PM emissions that affect local air quality at various times during construction. Effects would be variable depending on the weather, soil conditions, the amount of activity taking place, and the nature of dust control efforts. The dry climate of the area during the summer months creates a high potential for dust generation. (ECORP, 2021a, p. 23)

As previously described, the County of Riverside Board of Supervisors Good Neighbor Policy for Logistics and Warehouse/Distribution Uses contains several policy provisions that address air pollutant generated during construction of warehouse/distribution projects proposing building space larger than 250,000 square feet in size. These provisions would apply to the construction of the Project (also see Mitigation Measure MM 4.3-1 in subsection 4.3.7). For instance, Provision 2.1 states that during construction of the warehouse/distribution facility, all heavy-duty haul trucks accessing the site shall have CARB-approved 2010 engines or newer approved CARB engine standards. Therefore Provision 2.1 would substantially reduce emissions compared with a typical construction project. Provision 2.2 requires that all excavators, graders, rubber-tired dozers, and similar "off-road" construction equipment shall be CARB Tier 3 Certified engines or better, and Provision 2.3 mandates that the maximum daily disturbance area (actively graded area) shall not exceed 10 acres per day. Provision 2.6 of the County of Riverside Board of Supervisors Good Neighbor Policy for Logistics and Warehouse/Distribution Uses requires surrounding streets be swept on a regular basis to remove any construction related debris and dirt, and Provision 2.7 further requires dust control measures that meet the SCAQMD standards be implemented for grading and construction activity. Construction equipment maintenance records and data sheets, which includes equipment design specifications and equipment emission control tier classifications, as well as any other records necessary to verify compliance with Provisions 2.1-2.7



above, shall be kept onsite and furnished to the County upon request per Provision 2.8. Also, Provision 2.9 states that construction contractors prohibit truck drivers from idling more than five minutes and require operators to turn off engines when not in use, in compliance with CARB regulations. Lastly, Provision 5.5 institutes that each proposed facility designate a Compliance Officer responsible for implementing the measures described herein and/or in the Project conditions of approval and mitigation measures. Contact information must be provided to the County and updated annually, and signs should be posted in visible locations providing the contact information of the Compliance Officer to the surrounding community. (ECORP, 2021a, pp. 23-24)

Per Provision 2.7, construction activities would be subject to SCAQMD Rule 403, which requires taking reasonable precautions to prevent the emissions of fugitive dust, such as using water or chemicals, where possible, for control of dust during the clearing of land and other construction activities. As required by Provision 2.2, all off-road construction equipment shall be CARB Tier 3 Certified engines or better. The first federal standards (Tier 1) for new off-road diesel engines were adopted in 1994 for engines over 50 horsepower and were phased in from 1996 to 2000. In 1996, a Statement of Principles pertaining to offroad diesel engines was signed between the USEPA, CARB, and engine makers (including Caterpillar, Cummins, Deere, Detroit Diesel, Deutz, Isuzu, Komatsu, Kubota, Mitsubishi, Navistar, New Holland, WisCon, and Yanmar). On August 27, 1998, the EPA signed the final rule reflecting the provisions of the Statement of Principles. The 1998 regulation introduced Tier 1 standards for equipment under 50 horsepower and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. As a result, all off-road, diesel-fueled construction equipment manufactured in 2006 or later has been manufactured to Tier 3 standards. The Tier 3 standards can reduce NO_x and PM emissions by as much as 64 and 39 percent, respectively. By requiring the use of Tier 3 construction equipment used during construction would substantially reduce temporary NO_x and PM emissions impacts generated during Project construction. (ECORP, 2021a, p. 24)

Construction-generated emissions associated with the proposed Project were calculated using the CARB-approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. The duration of construction has been adjusted to reflect a start date in the summer of 2021 and an anticipated opening year in the year 2025. The CalEEMod model defaults for the number of construction equipment employed was doubled for all construction phases with accelerated timelines. Construction-generated emissions were calculated to account for the construction of the entire Specific Plan simultaneously in order to identify the worst-case construction emissions potential. However, the actual construction of the Project site would be dependent on several factors, including timing of Project approvals, market conditions, and/or Project funding. As such, this analysis accounts for minor modifications as Project plans evolve from conceptual planning to final mapping. If construction starts at a later date, it can be expected that Project emissions would be reduced because CalEEMod incorporates lower emission factors associated with construction equipment in future years due to improved emissions controls and fleet modernization through turnover. See Attachment A to the Project's AQA (*Technical Appendix B*) for more information regarding the construction assumptions, including construction equipment and duration, used in this analysis. (ECORP, 2021a, p. 24)



Predicted maximum daily construction-generated emissions for the proposed Project are summarized in Table 4.3-6, *Construction-Related Emissions (Regional Significance Analysis)*. Construction-generated emissions are short-term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD’s thresholds of significance. As shown in Table 4.3-6, emissions of the O₃ precursor, NO_x, on the peak day(s) of construction in 2022 would exceed the SCAQMD significance thresholds of 100 pounds per day. Thus, in the absence of mitigation, Project-related construction activities would result in a cumulatively-considerable net increase of a criteria pollutant (ozone) for which the Project region is non-attainment under an applicable federal or State ambient air quality standard. This is evaluated as a significant impact for which mitigation would be required. (ECORP, 2021a, pp. 24-25)

Table 4.3-6 Construction-Related Emissions (Regional Significance Analysis)

Construction Year	Pollutant (pounds per day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Construction in 2021 (including offsite construction)	9.83	88.93	53.01	0.08	19.22	12.03
Construction in 2022	43.21	105.33	128.18	0.40	17.81	10.80
Construction in 2023	42.07	89.21	122.78	0.39	16.76	6.47
Construction in 2024	41.36	85.32	119.32	0.38	16.48	6.21
Construction in 2025	40.62	80.69	115.41	0.38	16.19	5.93
<i>SCAQMD Regional Significance Threshold</i>	75	100	550	150	150	55
Exceed SCAQMD Regional Threshold?	No	Yes	No	No	No	No

Source: CalEEMod version 2016.3.2; EMFAC2017. Refer to Attachment A to the Project’s AQA (*Technical Appendix B*) for Model Data Outputs.

Notes: Emission reduction/credits for construction emissions are applied based on the required implementation of SCAQMD Rule 403. The specific Rule 403 measures applied in CalEEMod include the following: sweeping/cleaning adjacent roadway access areas daily; washing equipment tires before leaving the construction site; water exposed surfaces three times daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. Building construction, paving, and painting are assumed to occur simultaneously. Construction emissions taken from the season (summer or winter) with the highest output. (ECORP, 2021a, Table 2-6)

B. Project Operations Criteria Air Quality Emissions

1. Regional Operational Significance Analysis

Implementation of the proposed Project would result in long-term operational emissions of criteria air pollutants such as PM₁₀, PM_{2.5}, CO, and SO₂ as well as ozone precursors such as ROG and NO_x. Project-



generated increases in emissions would be predominantly associated with motor vehicle use. (ECORP, 2021a, p. 29)

As previously described, the County of Riverside Board of Supervisors Good Neighbor Policy for Logistics and Warehouse/Distribution Uses contains several policy provisions that address air pollutant generated during construction of warehouse/distribution projects proposing building space larger than 250,000 square feet in size. These provisions would apply to the operations of the Project (also see Mitigation Measure MM 4.3-7 in subsection 4.3.7). For instance, Provision 3.3 states that warehouse/distribution facilities must be designed to provide adequate on-site parking for commercial trucks and passenger vehicles and on-site queuing for trucks that is away from sensitive receptors. Such a measure prevents general queuing and spill-over of trucks onto surrounding public streets. This policy provision prohibits commercial trucks from parking in the public road right-of-way or nearby residential areas. Provision 4.1 requires facility operators to maintain records of their fleet equipment and ensure that all diesel-fueled Medium-Heavy Duty Trucks and Heavy-Heavy Duty Trucks accessing the site use year CARB 2010 or newer engines. Thus, older model year trucks, which are less efficient and produce greater air pollutant emissions, would be prohibited from visiting the site. (ECORP, 2021a, pp. 29-30)

As previously described, operational air pollutant emissions were based on the Project site plans and the estimated traffic trip generation rates and Project fleet mix from the Project's Traffic Analysis ("TA"; EIR *Technical Appendix L2*). Consistent with SCAQMD recommendations, in order to more accurately account for the trip distribution patterns of freight trucks, the average trip length is calculated at 63.7 miles, which represents the average distance between the Project site and the Port of Los Angeles/Long Beach, the Project site and the Banning Pass, the Project Site and the San Diego County line, the Project site and the Cajon Pass, and the Project site and downtown Los Angeles. (ECORP, 2021a, p. 30)

Long-term operational emissions attributable to the proposed Project are identified in Table 4.3-7, *Operational-Related Emissions (Regional Significance Analysis)*, and compared to the regional operational significance thresholds promulgated by the SCAQMD. As shown in Table 4.3-7, the emissions associated with operations would exceed the SCAQMD significance threshold for ROG and NO_x. As previously described, ROG and NO_x are precursors of O₃, a pollutant for which the SCAB is classified as nonattainment. (ECORP, 2021a, pp. 30-31)

O₃ is produced when ROG and NO_x undergo photochemical reactions that occur only in the presence of sunlight. O₃ is a very difficult pollutant to regulate due to the time it takes to create and the fact that it can be transported away from its source by wind and meteorological air patterns. People with lung disease, children, older adults, and people who are active can be affected when O₃ levels exceed ambient air quality standards. Numerous scientific studies have linked ground level O₃ exposure to a variety of problems including lung irritation, difficult breathing, permanent lung damage to those with repeated exposure, and respiratory illnesses. O₃ and NO_x have been decreasing in California since 1975 and are projected to continue to decrease in the future. Although vehicle miles traveled across the state continue to increase, NO_x levels are decreasing due to the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-



emitting vehicles. NO_x emissions from electric utilities have also decreased due to the use of cleaner fuels and renewable energy. (ECORP, 2021a, p. 31)

Table 4.3-7 Operational-Related Emissions (Regional Significance Analysis)

Emission Source	Pollutant (pounds per day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	56.35	0.00	0.25	0.00	0.00	0.00
Energy	1.64	14.90	12.52	0.08	1.13	1.13
Mobile						
<i>Passenger Vehicles</i>	5.28	21.08	196.98	0.73	0.41	0.39
<i>Heavy-Duty Trucks</i>	3.34	293.04	40.29	1.84	3.95	3.78
Mobile Source Total	8.62	314.12	237.27	2.57	4.36	4.17
Total:	66.61	329.02	250.04	2.65	5.49	5.3
<i>SCAQMD Regional Significance Threshold</i>	55	55	550	150	150	55
Exceed SCAQMD Regional Threshold?	Yes	Yes	No	No	No	No

Source: CalEEMod version 2016.3.2; EMFAC2017. Refer to Attachment A to the Project’s AQA (*Technical Appendix B*) for Model Data Outputs.

Notes: Emissions projections account for a trip generation rate and fleet mix identified by the Project’s TA (*Technical Appendix L2*). Specifically, the Project’s TA estimates the generation of 5,422 average vehicle trips daily, 1,044 of which would be heavy-duty trucks. Heavy-duty trucks are a weighted average of Medium-heavy duty trucks and Heavy-heavy duty trucks as identified by the Project Traffic Assessment. The average trip length is calculated at 63.7 miles, which represents the average distance between the Project site and the Port of Los Angeles/Long Beach, the Project site and the Banning Pass, the Project Site and the San Diego County line, the Project site and the Cajon Pass, and the Project site and downtown Los Angeles. Operational emissions taken from the season (summer or winter) with the highest output. (ECORP, 2021a, Table 2-9)

SCAQMD’s 2016 AQMP, previously described, identifies robust NO_x reductions from new regulations on Regional Clean Air Incentives Market (RECLAIM) facilities, non-refinery flares, commercial cooking, and residential and commercial appliances. Such combustion sources are already heavily regulated with the lowest NO_x emissions levels achievable, yet there are opportunities to require and accelerate replacement with cleaner zero-emission alternatives, such as residential and commercial furnaces, pool heaters, and backup power equipment. The SCAQMD plans to achieve such replacements through a combination of regulations and incentives. Technology-forcing regulations can drive development and commercialization of clean technologies, with future year requirements for new or existing equipment. Incentives can then accelerate deployment and enhance public acceptability of new technologies. The 2016 AQMP also emphasizes that beginning in 2012, continued implementation of previously adopted regulations have been leading to NO_x emission reductions of 68 percent by 2023 and 80 percent by 2031. With the addition of 2016 AQMP regulatory measures, a 30 percent reduction of NO_x from stationary sources is expected in the 15-year period



between 2008 and 2023. This is in addition to significant NO_x reductions from stationary sources achieved in the decades prior to 2008. (ECORP, 2021a, p. 31)

NO_x and ROG are produced as a result of incomplete fossil fuel combustion. The majority of these emissions would be generated by mobile sources, which is an emission source that cannot be regulated by the County of Riverside. CARB is primarily responsible for controlling pollution from motor vehicles. The air district must adopt rules to achieve and maintain the CAAQS and NAAQS within their jurisdiction. A reduction of vehicle trips to and from the proposed Project site would reduce the amount of mobile emissions. Methods of reducing vehicle trips include carpooling, transit, cycling, and pedestrian connections. However, this Project is proposing a large amount of industrial warehousing, and the reduction of vehicle trips is only feasible for the future Project employees, though the majority of emissions would be a result heavy-duty trucks related to transporting freight. (ECORP, 2021a, p. 31)

The State of California has implemented numerous strategies pertaining to trucks and the reduction of emissions that directly apply to the Project. Urban goods delivery is an essential component of the greater freight system and vital to the urban economy. While urban goods delivery represents a small share of urban traffic, it generates a disproportionate amount of pollution emissions. The State of California promulgates policies designed and implemented to improve the efficiency and environmental footprint of the urban freight system, including the introduction of zero and near-zero emission vehicles – a strategy embedded in the Governor’s Sustainable Freight Action Plan as well as CARB’s AB 32 Scoping Plan, SIP, and Mobile Source Strategy. (ECORP, 2021a, pp. 31-32)

Project development would be required to be consistent with the applicable air quality-related policy provisions contained in the County General Plan Air Quality Element. For instance, development of the proposed Project would occur in a manner that protects people and land uses sensitive to air pollution through the use of barriers and/or distance from emissions sources (Policy AQ 2.2), and would implement pollution control measures such as landscaping, vegetation, and other materials, which trap particulate matter or control pollution (Policy 2.3). Consistent with General Plan Policy AQ 4.9, construction activities would be subject to SCAQMD Rule 403, which requires taking reasonable precautions to prevent the emissions of fugitive dust, such as using water or chemicals, where possible, for control of dust during the clearing of land and other construction activities. All development in the County, including the Project, is required to adhere to all County-adopted policy provisions, including those contained in the adopted Air Quality Element. The County ensures all provisions of the General Plan are incorporated into projects and their permits through development review and applications of conditions of approval as applicable. (ECORP, 2021a, p. 32)

Notwithstanding, operational emissions associated with the Project would exceed SCAQMD regional thresholds for emissions of ROG_s and NO_x. As such, in the absence of mitigation, long-term Project operations 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. This is evaluated as a significant impact for which mitigation would be required.



Threshold c.: Would the Project expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?

Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. The Project has the potential to expose sensitive receptors to substantial pollutant concentrations that could result in cancer risks, non-cancer hazards, and CO “hot spots.” Each is discussed below. (ECORP, 2021a, p. 44)

A. Construction-Related Localized Air Quality Impacts

1. LST Analysis for Construction-Generated Air Contaminants

As previously described, in addition to regional significance thresholds, the SCAQMD developed localized significance thresholds (LSTs) for emissions of NO_x, CO, PM₁₀, and PM_{2.5} generated at new development sites (offsite mobile source emissions are not included in the LST analysis protocol). LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative. The SCAQMD Environmental Justice Enhancement Initiative program seeks to ensure that everyone has the right to equal protection from air pollution. The Environmental Justice Program is divided into three categories, with the LST protocol promulgated under Category I: Further-Reduced Health Risk. LST analysis for construction is applicable for all projects that disturb five acres or less on a single day. However, the Project site spans an area of approximately 157.1 acres and therefore it is likely that construction onsite would disturb more than five acres in a single day. Nonetheless, applying the one-acre, two-acre, and five-acre LST thresholds to projects disturbing greater acreage is conservative. For instance, the five-acre LST thresholds were developed in part based on the dispersion of pollutants over a five-acre construction area before exposing sensitive receptors. Thus, applying the five-acre LST thresholds to a project that could disturb more than five acres daily does not consider the pollutant-dispersing effect of the dispersion of pollutants over a larger site before exposing receptors, and is therefore a lower threshold than one calculated specific to sites larger than five acres in size. Therefore, while the proposed Project likely would disturb more than five acres on a single day, the LST threshold value for a five-acre site was employed from the LST lookup tables. This is conservative since the analysis will only consider for the dispersion of air pollutants over five acres before reaching sensitive receptors, as opposed to accounting for the dispersion of air pollutants over a larger area. (ECORP, 2021a, pp. 27-258)

LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Notwithstanding, the SCAQMD Methodology explicitly states that it is possible that a project may have receptors closer than 25 meters. SCAQMD recommends that projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters. The nearest sensitive receptors to the site are rural residences located on Horsethief Canyon Road as well as residences located in the Horsethief Canyon Ranch Community located directly adjacent to the southern and western Project site



boundary. On and offsite construction would be located closest to the rural residences located on Horsethief Canyon Road approximately 25 feet distant (7.62 meters). Therefore, LSTs for receptors located at 25 meters were utilized in the analysis. The SCAQMD's methodology clearly states that "offsite mobile emissions from a project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "onsite" emissions outputs were considered. (ECORP, 2021a, p. 28)

As previously stated, the SCAQMD developed LSTs for emissions of NO_x, CO, PM₁₀, and PM_{2.5}. A construction HRA has been prepared to evaluate potential health risks associated with the emission of DPM, which includes PM₁₀ and PM_{2.5}, resulting from the construction activities necessary to build the Project (see Attachment B to the Project's AQA, included as EIR *Technical Appendix B*). Table 4.3-8, *Construction-Related Emissions (Localized Significance Analysis)*, presents the results of localized NO_x and CO emissions for onsite and offsite construction associated with the proposed Project. Table 4.3-8 shows that the estimated emissions on the peak day of construction for the proposed Project would not surpass NO_x or CO LST thresholds with adherence to Mitigation Measures MM 4.3-1 and MM 4.3-2 (refer to subsection 4.3.7), which among other measures requires the use of Tier 4 Certified cranes to be used in Project construction. Notwithstanding, because mitigation measures are required to ensure that Project construction-related localized air quality emissions do not exceed the identified SCAQMD localized significance thresholds, the Project's localized construction-related air quality impacts would be significant prior to mitigation. (ECORP, 2021a, p. 28)

2. Health Risk Assessment for Construction-Generated Air Contaminants

A construction Health Risk Assessment (HRA) has been prepared to evaluate potential health risks associated with the emission of DPM, which includes PM₁₀ and PM_{2.5}, resulting from the construction activities necessary to build the Project (see Attachment B to the Project's AQA, included as EIR *Technical Appendix B*). The HARP2 model provided by CARB, with regulatory default settings, was used to perform the dispersion and health risk modeling for this analysis. HARP2 implements the latest regulatory guidance to develop inputs to the U.S. EPA AERMOD dispersion model for dispersion and as the inputs for calculations for the various health risk levels. Conservative estimates and information from the Project's TA (EIR *Technical Appendix L2*) were used to model DPM emissions from associated on and off-site diesel truck traffic during operations. CalEEMod was used to estimate the emissions from diesel fired off-road equipment and diesel truck traffic during construction. All roadway sources within a quarter mile of the Project site boundary were included in modeling analysis. The air dispersion modeling for the HRA was performed using the USEPA AERMOD Version 19121 dispersion model. AERMOD is a steady-state, multiple-source, Gaussian dispersion model designed for use with emission sources situated in terrain where ground elevations can exceed the stack heights of the emission sources. The following discussion is sourced from the construction related HRA prepared for the Project (see Attachment B to the Project's AQA). (ECORP, 2021a, p. 45)



Table 4.3-8 Construction-Related Emissions (Localized Significance Analysis)

Construction Activity	Pollutant (pounds per day)	
	NO _x	CO
Site Preparation 2021 (onsite and offsite water line)	88.81	46.32
Building Construction 2021 (instillation of water line)	7.59	9.62
Paving & Architectural Coating 2021(water line)	7.40	8.20
Site Preparation 2022	66.16	39.39
Grading 2022	77.68	58.08
Building Construction, Paving & Architectural 2022	49.49	66.74
Building Construction, Paving & Architectural 2023	45.61	66.60
Building Construction, Paving & Architectural 2024	42.76	66.64
Building Construction, Paving & Architectural 2025	39.38	66.43
<i>SCAQMD Localized Significance Threshold</i>	<i>371</i>	<i>1,965</i>
Exceed SCAQMD Localized Threshold?	No	No

Source: CalEEMod version 2016.3.2; EMFAC2017. Refer to Attachment A to the Project’s AQA (*Technical Appendix B*) for Model Data Outputs.

Notes: Emission reduction/credits for construction emissions are applied based on the required implementation of SCAQMD Rule 403. The specific Rule 403 measures applied in CalEEMod include the following: sweeping/cleaning adjacent roadway access areas daily; washing equipment tires before leaving the construction site; water exposed surfaces three times daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. Building construction, paving, and painting are assumed to occur simultaneously.

(ECORP, 2021a, Table 2-8)

For construction activity, DPM is the primary TAC of concern. Emission factors were generated using EMFAC2021 for construction in the year 2021 to and conservatively utilized throughout the proposed period of construction. Construction off-road equipment was modeled as 748 volume sources spaced 20 meters apart per SCAQMD construction HRA guidance. 124 of the volume sources were used to represent the business park uses proposed for Planning Area 1 of SP 333A1 and 624 were used to represent the light industrial uses proposed within SP 333A1 Planning Area 2. Per the landscape buffer required by the design guidelines included in SP 333A1 the volume sources for the business park uses were placed 10 feet from the fence line and 100 feet from the fence line in the light industrial areas. Annual off-road PM₁₀ exhaust emissions generated using the CalEEMod model were used to represent emissions from onsite off-road diesel equipment used throughout construction. The annual emissions for the worst-case scenario (2022) were used to conservatively



estimate annual construction emissions for the estimated Project duration of five years. (ECORP, 2021a, pp. 45-46)

☐ Construction-Related Cancer Risks

Cancer risk calculations for existing residential receptors are based on a 5-year exposure period for construction. As described above, the calculated cancer risk accounts for 350 days per year of exposure to existing residential receptors. While the average American spends 87 percent of their life indoors, neither the pollutant dispersion modeling nor the health risk calculations account for the reduced exposure structures provide. Instead, health risk calculations account for the equivalent exposure of continual outdoor living. The calculated carcinogenic risk at Project vicinity receptors is depicted in Table 4.3-9, *Cancer Risk Summary by Pollutant – Construction Activities*. (ECORP, 2021a, p. 47)

As shown in Table 4.3-9, impacts related to cancer risk for all modeled scenarios would be below the 10 in one million threshold for Project-related construction activities. These calculations do not account for any pollutant-reducing remedial components inherent to the Project or the Project site. For construction emissions the Maximumly Exposed Individual Resident (MEIR) receptor is located 150 feet north of the site has a 5-year cancer risk of 4.64 related to the Project. The Maximumly Exposed Individual Worker (MEIW) is located approximately a quarter mile north of the Project site in a large industrial area and has a 5-year cancer risk of 0.13 in one million. The maximumly exposed individual school child (MEISC) is located at Luiseño Elementary School south of the Project with a five-year cancer risk of 0.01. The locations of cancer risk MEIR and MEIW can be seen in Figure A-4 found in Attachment B to the Project’s AQA (*Technical Appendix B*). Detailed cancer risk results for all modeled receptors also can be found in Attachment B of the Project’s AQA. Based on the results presented in Table 4.3-9, Project-related construction activities would not expose nearby sensitive receptors to cancer risks exceeding 10 in one million, and localized construction-related DPM impacts would therefore be less than significant. (ECORP, 2021a, pp. 47-48)

Table 4.3-9 Cancer Risk Summary by Pollutant – Construction Activities

Exposure Scenario	Total Risk
Construction	
5-Year Exposure Resident	4.64
5-Year Exposure Worker	0.13
5-Year Exposure School	0.01
Significance Threshold	10

(ECORP, 2021a, Table 2-11)



Construction-Related Non-Carcinogenic Hazards

In addition to cancer risk, the significance thresholds for TAC exposure requires an evaluation of non-cancer risk stated in terms of a hazard index. Non-cancer chronic impacts are calculated by dividing the annual average concentration by the Reference Exposure Level (REL) for that substance. The REL is defined as the concentration at which no adverse non-cancer health effects are anticipated. The potential for acute non-cancer hazards is evaluated by comparing the maximum short-term exposure level to an acute REL. RELs are designed to protect sensitive individuals within the population. (ECORP, 2021a, p. 48)

A chronic hazard index of 1.0 is considered individually significant. The hazard index is calculated by dividing the acute or chronic exposure by the REL. The highest maximum chronic hazard indexes for residents, workers, and school children as a result of DPM exposure from Project construction activities is shown in Table 4.3-10, *Non-Carcinogenic Health Risk Summary*. As shown in Table 4.3-10, impacts related to non-cancer risk (chronic hazard index) as a result of Project construction activities would not surpass the significance threshold; thus, Project construction-related non-carcinogenic hazards would be less than significant. (ECORP, 2021a, p. 48)

Table 4.3-10 Non-Carcinogenic Health Risk Summary

Exposure Scenario	Maximum Residential Hazard	Maximum Worker Hazard	Maximum Sensitive Receptor Hazard
Operation	0.0015	0.0015	4.4e-05
Construction	0.002	0.002	4.1e-05
Significance Threshold	1	1	1

(ECORP, 2021a, Table 2-12)

Operational-Related Localized Air Quality Impacts

LST Analysis for Operational-Generated Air Contaminants

As previously described, in addition to regional significance thresholds, the SCAQMD developed LSTs for emissions of NO_x, CO, PM₁₀, and PM_{2.5} generated at new development sites (offsite mobile source emissions are not included in the LST analysis protocol). According to the SCAQMD localized significance threshold methodology, LSTs would apply to the operational phase of a proposed project if the project includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). The Project is proposing business park and light industrial land uses that would accommodate warehouse activity. Therefore, the operational phase LST protocol is applied. (ECORP, 2021a, pp. 39-40)

The nearest sensitive receptors to the site are rural residences located on Horsethief Canyon Road approximately 25 feet distant (7.62 meters). The SCAQMD Methodology states: It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest



receptor should use the LSTs for receptors located at 25 meters. Therefore, LSTs for receptors located at 25 meters were utilized in the analysis. (ECORP, 2021a, p. 40)

The SCAQMD has produced lookup tables for projects that disturb one, two and five acres. While the Project site comprises 157.1 acres, the LST threshold value for a five-acre site was employed from the LST lookup tables. This is conservative since the analysis will only account for the dispersion of air pollutants over five acres before reaching sensitive receptors, as opposed to accounting for the dispersion of air pollutants over a greater 157.1-acre area. For a worst-case scenario assessment, the emissions shown in Table 4.3-11, *Project Operational Emissions (Localized Significance Analysis)*, include all “onsite” Project-related stationary (area) sources and 10 percent of the Project-related mobile sources. Considering that the longest weighted trip length used for calculating mobile emissions is approximately 63.7 miles for heavy duty trucks and 16.6 miles for passenger vehicles, 10 percent of this total would represent an onsite travel distance for each truck of approximately 6.4 miles and 1.7 miles for each passenger vehicle; thus, the 10 percent assumption is conservative and would tend to overstate the actual impact. (ECORP, 2021a, p. 40)

Table 4.3-11 Project Operational Emissions (Localized Significance Analysis)

Operations	Pollutant (pounds per day)	
	NO _x	CO
Onsite Emissions	31.42	23.97
SCAQMD Localized Significance Threshold	371	1,965
Exceed SCAQMD Localized Threshold?	No	No

Source: EMFAC2017. Refer to Attachment A to the Project’s AQA (*Technical Appendix B*) for Model Data Outputs.

Notes: Emissions projections account for a trip generation rate and fleet mix identified by the Project’s TA (*EIR Technical Appendix L2*). Specifically, the Project’s TA estimates the generation of 5,422 average vehicle trips daily, 1,044 of which would be heavy-duty trucks.

(ECORP, 2021a, Table 2-10)

Operational LSTs apply to CO, NO₂, PM₁₀, and PM_{2.5}. An operational HRA has been prepared to evaluate potential health risks associated with the emission of DPM, which includes PM₁₀ and PM_{2.5}, resulting heavy-duty trucks (see Attachment B to the Project’s AQA, included as *EIR Technical Appendix B*). Table 4.3-11 presents the results of localized NO_x and CO emissions associated with the Project. As shown in Table 4.3-11, the emissions of these pollutants on the peak day of operations would not result in significant concentrations of NO_x or CO pollutants at nearby sensitive receptors. As such, Project operational-related localized emissions impacts would be less than significant. (ECORP, 2021a, p. 40)

2. Health Risk Assessment for Operational Activities

Project related onsite and offsite roadway sources were entered into AERMOD as thirteen-line sources. These sources all have distances relative to the projected onsite roadways and the existing surface streets. Roadway



sources all have a width of 7.4 meters using standard line sizing and an estimated two lanes. Roadway sources were modeled for all roads where trucks are allowed to travel. This does not include the southeast entrance to the Project site from Bolo Court, which would be restricted to passenger vehicles only. Thus, the emissions from this entrance are considered negligible for the purposes of analysis. Onsite idling at loading bays was modeled as three separate line sources with widths of 35 meters in the estimated locations of Project loading bays. The placement of the onsite idling sources were all 300 feet from the nearest house and to represent the ‘worst case’ scenario since the exact building location of future buildings is not known yet known. A map of all operational sources is presented in the Attachment B to the Project’s AQA (*Technical Appendix B*). (ECORP, 2021a, p. 46)

Daily truck trips were based on the Project’s TA (*EIR Technical Appendix L2*). The estimated ratio of trips on each roadway link along with the daily trips were combined with an estimated operational schedule of five days a week for 50 weeks a year to estimate the annual emissions from each link. (ECORP, 2021a, p. 46)

Emission factors for PM₁₀ exhaust emissions were generated using EMFAC2021 for idling, and 5, 15, and 45 miles per hour which were used to create composite emission factors for average onsite and offsite truck traffic. The ratio of Heavy Duty and Medium Duty trucks in the Project’s TA (*EIR Technical Appendix L2*) also was utilized in the onsite and offsite composite emission factors. These emission factors were then multiplied by the annual trips by link with the distance for each roadway link and idle time to calculate emissions from traffic and idling related to the Project, respectively. Idling was estimated at 10 minutes per trip conservatively to account for any trucks that go over the five-minute idling limit established by CARB Rule 2485. EMFAC2021 emission factors for 2025 and 2030 on were utilized to calculate two sets of annual emissions used for modeling from 2025 through 2030 and 2030 on for the various risk scenarios. (ECORP, 2021a, p. 46)

Emissions from the potential transport refrigeration units (TRUs) were also included in the calculated emissions. The Tier 4 PM emission factors from the latest amendment of the CARB TRU Airborne Toxic Control Measures (ATCM) were used to estimate DPM emission rates from TRUs. Load factors and the average horsepower for each of the TRUs were estimated using information from CARB’s Draft 2019 Update to the Emissions Inventory for TRUs. The ratio of trucks with TRUs to those without was generated using the ratio of refrigerated space to that of total space utilized for the proposed light industrial area. Emissions from TRUs during idling were estimated at five minutes each trip as the average time to plug in the TRU as plug in capabilities for refrigerated warehouse space are required by Section 2477, Title 13, Division 3, Chapter 9, Article 8 of the California Code of Regulations. Annual emissions from TRUs were then added to the exhaust idling and traffic emissions for each operational source. (ECORP, 2021a, pp. 46-47)

Operational-Related Cancer Risks

Cancer risk calculations for existing residential receptors are based on 70-, 30-, and 9-year exposure periods to for operations. The calculated cancer risk accounts for 350 days per year of exposure to existing residential receptors. While the average American spends 87 percent of their life indoors, neither the pollutant dispersion modeling nor the health risk calculations account for the reduced exposure structures provide. Instead, health risk calculations account for the equivalent exposure of continual outdoor living. The calculated carcinogenic



risk at Project vicinity receptors was previously depicted in Table 4.3-12, *Cancer Risk Summary by Pollutant – Operational Activities*. (ECORP, 2021a, p. 47)

Table 4.3-12 Cancer Risk Summary by Pollutant – Operational Activities

Exposure Scenario	Total Risk
Operation	
70-Year Exposure Resident	7.84
30-Year Exposure Resident	6.60
9-Year Exposure Resident	4.59
25-Year Exposure Worker	0.47
9-Year Exposure School	0.13
Significance Threshold	10

(ECORP, 2021a, Table 2-11)

For operational emissions the MEIR receptor is located 150 feet north of the site has a 70-year cancer risk of 7.84 related to the Project. The MEIW is located at the wastewater treatment plant which borders the Project site directly to the west and has a 25-year cancer risk of 0.47 in one million. The MEISC is located at Luiseno Elementary School south of the project with a nine-year cancer risk of 0.13. Accordingly, and based on the results presented in Table 4.3-12, Project operations would not expose the MEIR, MEIW, or MEISC to cancer-related risks exceeding 10 in one million. As such, Project-related DPM emissions would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant. (ECORP, 2021a, p. 48)

The locations of cancer and non-cancer chronic risk MEIR and MEIW can be seen in Figure A-7 found in Attachment B of the Project’s AQA (*Technical Appendix B*). Detailed cancer risk results for all modeled receptors can also be found in Attachment B to the Project’s AQA. (ECORP, 2021a, p. 48)

Operational-Related Non-Carcinogenic Hazards

As previously indicated, non-cancer chronic impacts are calculated by dividing the annual average concentration by the REL for that substance. A chronic hazard index of 1.0 is considered individually significant. The hazard index is calculated by dividing the acute or chronic exposure by the REL. The highest maximum chronic hazard indexes for residents, workers, and school children as a result of DPM exposure from Project operations was previously presented in Table 4.3-10. As shown in Table 4.3-10, impacts related to non-cancer risk (chronic hazard index) as a result of the Project site would not surpass significance



thresholds. As such, Project-related operations would not expose nearby sensitive receptors to non-carcinogenic health risks, and impacts would therefore be less than significant. (ECORP, 2021a, p. 48)

As only DPM emissions were analyzed for the Project, the MEIR, MEIW and maximumly affected school child are the same for Chronic Hazard as they are for cancer risk and their locations are identified in Figure A-7 in Attachment B to the Project's AQA (*Technical Appendix B*). (ECORP, 2021a, p. 49)

C. Carbon Monoxide Hot Spots

It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when idling at intersections. Concentrations of CO are a direct function of the number of vehicles, length of delay, and traffic flow conditions. Under certain meteorological conditions, CO concentrations close to congested intersections that experience high levels of traffic and elevated background concentrations may reach unhealthy levels, affecting nearby sensitive receptors. Given the high traffic volume potential, areas of high CO concentrations, or "hot spots," are typically associated with intersections that are projected to operate at unacceptable levels of service during the peak commute hours. (ECORP, 2021a, p. 49)

It also has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. However, transport of this criteria pollutant is extremely limited, and CO disperses rapidly with distance from the source under normal meteorological conditions. Furthermore, vehicle emissions standards have become increasingly more stringent in the last 20 years. In 1993, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SCAB is now designated as attainment, as previously noted in Table 4.3-3. Detailed modeling of Project-specific CO "hot spots" is not necessary and thus this potential impact is addressed qualitatively. (ECORP, 2021a, p. 49)

A CO "hot spot" would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur. The analysis prepared for CO attainment in the SCAQMD's 1992 Federal Attainment Plan for Carbon Monoxide in Los Angeles County and a Modeling and Attainment Demonstration prepared by the SCAQMD as part of the 2003 AQMP can be used to demonstrate the potential for CO exceedances of these standards. The SCAQMD conducted a CO hot spot analysis as part of the 1992 CO Federal Attainment Plan at four busy intersections in Los Angeles County during the peak morning and afternoon time periods. The intersections evaluated included Long Beach Boulevard and Imperial Highway (Lynwood), Wilshire Boulevard and Veteran Avenue (Westwood), Sunset Boulevard and Highland Avenue (Hollywood), and La Cienega Boulevard and Century Boulevard (Inglewood). The busiest intersection evaluated was at Wilshire Boulevard and Veteran Avenue, which has a traffic volume of approximately 100,000 vehicles per day. Despite this level of traffic, the CO analysis concluded that there was no violation of CO standards. To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO "hot spot" analysis was conducted in 2003 at the same four busy intersections in Los Angeles at the peak morning and afternoon time periods. This "hot spot" analysis did not predict any violation of CO standards.



The highest one-hour concentration was measured at 4.6 ppm at Wilshire Boulevard and Veteran Avenue and the highest eight-hour concentration was measured at 8.4 ppm at Long Beach Boulevard and Imperial Highway. (ECORP, 2021a, p. 49)

Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour, or 24,000 vehicles per hour where vertical and/or horizontal air does not mix, in order to generate a significant CO impact. (ECORP, 2021a, p. 50)

As indicated by the Project's TA (*Technical Appendix L2*) the proposed Project is anticipated to result in 5,422 average daily vehicular trips (in terms of actual vehicles). Thus, the proposed Project would not generate traffic volumes at any intersection of more than 100,000 vehicles per day (or 44,000 vehicles per day) and there is no likelihood of the Project traffic exceeding CO thresholds of significance. Localized air quality impacts related to CO "hot spots" would therefore be less than significant. (ECORP, 2021a, p. 50)

D. Air Quality Health Impacts (Friant Ranch)

A recent Supreme Court of California decision, *Sierra Club v. County of Fresno (Friant Ranch)*, states that EIRs should relate a project's expected significant adverse air quality impacts to likely human health consequences or explain why it is not feasible at the time of preparing the EIR to provide such an analysis. Given that the proposed Project's implementation would result in a significant direct and cumulatively-considerable impact associated with ROG and NO_x emissions under long-term operating conditions, the potential health consequences associated with these air pollutants, as well as other air pollutants associated with the Project, were considered. Pursuant to Rule 8.520(f) of the Rules of the California Court, the SCAQMD and the San Joaquin Valley Air Pollution Control District (SJVAPCD) filed amicus curiae briefs ("Briefs") in regard to this case. In both Briefs, SCAQMD and SJVAPCD provided technical explanations as to why it may not be feasible for a project to relate the expected adverse air quality impacts to likely health consequences. As summarized below, for the reasons set forth by the SCAQMD and SJVAPCD, the proposed Project's significant air quality impacts currently cannot feasibly be related to likely health consequences. (ECORP, 2021a, pp. 36-37)

While the proposed Project's operational emissions of ROG and NO_x would contribute to ozone (O₃), O₃ is not formed at the location of sources/emissions, which necessitates the use of complex and more sophisticated modeling that is not reasonably feasible at this time. As noted in the Briefs, "For the so-called criteria pollutants, such as O₃, it may be more difficult to quantify health impacts. O₃ is formed in the atmosphere from the chemical reaction of NO_x and VOC in the presence of sunlight. It takes time and the influence of meteorological conditions for these reactions to occur, so O₃ may be formed at a distance downwind from the sources." (ECORP, 2021a, p. 37)

Additionally, O₃ and secondary PM formation is complex, which necessitates the use of more sophisticated modeling that is not reasonably feasible at this time. The proposed Project, while much smaller in scale to the



Friant Ranch project, similarly includes area wide sources and mobile sources. As noted in the Briefs, “Meteorology, the presence of sunlight, and other complex chemical factors all combine to determine the ultimate concentration and location of O₃ or PM. This is especially true for a project like Friant Ranch where most of the criteria pollutant emissions derive not from a single ‘point source,’ but from area wide sources (consumer products, paint, etc.) or mobile sources (cars and trucks) driving to, from and around the site.” (ECORP, 2021a, p. 37)

The quantity of precursor emissions is not proportional to local O₃ and secondary PM concentration, which necessitates the use of complex and more sophisticated modeling that is not reasonably feasible for the proposed Project at this time. As noted in the Briefs, “Ground level O₃ (smog) is not directly emitted into the air but is formed when precursor pollutants such as NO_x and VOCs [also referred to as ROG] are emitted into the atmosphere and undergo complex chemical reactions in the process of sunlight. Once formed, O₃ can be transported long distances by wind. Because of the complexity of O₃ formation, a specific tonnage amount of NO_x or VOCs [ROG] emitted in a particular area does not equate to a particular concentration of O₃ in that area.” As further noted in the Briefs, “Secondary PM, like O₃, is formed via complex chemical reactions in the atmosphere between precursor chemicals such as SO_x and NO_x. Because of the complexity of secondary PM formation, the tonnage of PM-forming precursor emissions in an area does not necessarily result in an equivalent concentration of secondary PM in that area.” (ECORP, 2021a, p. 37)

Furthermore, emissions do not cause health effects. Rather, it is the resulting concentration of criteria pollutants, which is influenced by sunlight, complex reactions, and transport, which necessitates the use of complex and more sophisticated modeling that is not reasonably feasible at this time. As noted in the Briefs, “The disconnect between the tonnage of precursor pollutants (NO_x, SO_x, and VOCs [ROG]) and the concentration of O₃ or PM formed is important because it is not necessarily the tonnage of precursor pollutants that causes human health effects, but the concentration of resulting O₃ or PM.” (ECORP, 2021a, p. 38)

Currently available modeling tools are appropriate for regional evaluations, but not individual projects like the proposed Project. As noted in the Briefs:

“For instance, the computer models used to simulate and predict an attainment date for the O₃ or particulate matter NAAQS in the San Joaquin Valley are based on regional inputs, such as regional inventories of precursor pollutants (NO_x, SO_x, and VOCs [ROG]) and the atmospheric chemistry and meteorology of the Valley... the models simulate future O₃ or PM levels based on predicted changes in precursor emissions Valley wide... The goal of these modeling exercises is not to determine whether the emissions generated by a particular factory or development project will affect the date that the Valley attains the NAAQS. Rather, the Air District's modeling and planning strategy is regional in nature and based on the extent to which all of the emission-generating sources in the Valley (current and future) must be controlled in order to reach attainment.” (ECORP, 2021a, p. 38)

“Thus, the CEQA air quality analysis for criteria pollutants is not really a localized, project-level impact analysis but one of regional, "cumulative impacts." (ECORP, 2021a, p. 38)



“...the currently available modeling tools are equipped to model the impact of all emission sources in the Valley on attainment... Running the photochemical grid model used for predicting O₃ attainment with the emissions solely from the Friant Ranch project (which equate to less than one-tenth of one percent of the total NO_x and VOC [ROG] in the Valley) is not likely to yield valid information given the relative scale involved.” (ECORP, 2021a, p. 38)

The SJVAPCD indicates that it is currently impossible to accurately correlate project-level emissions to specific health impacts. As they noted in their Brief, “...even once a model is developed to accurately ascertain local increases in concentrations of photochemical pollutants like O₃ and some particulates, it remains impossible, using today's models, to correlate that increase in concentration to a specific health impact. The reason is the same: such models are designed to determine regional, population-wide health impacts, and simply are not accurate when applied at the local level.” (ECORP, 2021a, p. 38)

SCAQMD highlights that CARB indicated that a CARB methodology of analysis for PM_{2.5} health impacts is not suited for small projects. Also, CARB has developed a methodology that can predict expected mortality (premature deaths) from large amounts of PM_{2.5}...SCAQMD used the CARB methodology to predict impacts from three very large power plants (e.g., 731-1,837 pounds/day). Again, this project involved large amounts of additional PM_{2.5} in the District, up to 2.82 tons/day (5,650 pounds/day of PM_{2.5}, or 1,029 tons/year). However, the primary author of the CARB methodology has reported that this PM_{2.5} health impact methodology is not suited for small projects and may yield unreliable results due to various uncertainties.” “Among these uncertainties are the representativeness of the population used in the methodology, and the specific source of PM and the corresponding health impacts.” (ECORP, 2021a, pp. 38-39)

SCAQMD also indicates that the CARB PM_{2.5} methodology would provide unreliable findings for a small project with a small population and that a lead agency should be able to decide if and when it may be appropriate. As noted in the Briefs, “...when SCAQMD prepared a CEQA document for the expansion of an existing oil production facility, with very small PM_{2.5} increases (3.8 pounds/day) and a very small affected population, staff elected not to use the CARB methodology for using estimated PM_{2.5} emissions to derive a projected premature mortality number and explained why it would be inappropriate to do so... SCAQMD staff concluded that use of this methodology for such a small source could result in unreliable findings and would not provide meaningful information.” (ECORP, 2021a, p. 39)

For the reasons set forth above, it is not currently feasible to relate the Proposed Project’s regional ROG and NO_x impacts to likely health consequences. The SCAQMD is responsible for assessing air pollutant impacts regionally, and the potential health consequences from those on a regional basis. The current evaluation on the limitations and uncertainties of existing tools is consistent with SCAQMD findings. Currently available regional modeling tools are not designed to capture changes in pollutant concentrations for the proposed Project that would be meaningful. This is due in part to a relatively coarse spatial resolution (e.g., greater than 4 x 4 kilometers) which makes it speculative to discern regional Project impacts on air quality. (ECORP, 2021a, p. 39)



Threshold d.: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Typically, odors are regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). (ECORP, 2021a, p. 50)

With respect to odors, the human nose is the sole sensing device. The ability to detect odors varies considerably among the population and overall is quite subjective. Some individuals have the ability to smell minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor; in fact, an odor that is offensive to one person (e.g., from a fast-food restaurant) may be perfectly acceptable to another. It is also important to note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity. (ECORP, 2021a, p. 50)

Quality and intensity are two properties present in any odor. The quality of an odor indicates the nature of the smell experience. For instance, if a person describes an odor as flowery or sweet, then the person is describing the quality of the odor. Intensity refers to the strength of the odor. For example, a person may use the word "strong" to describe the intensity of an odor. Odor intensity depends on the odorant concentration in the air. When an odorous sample is progressively diluted, the odorant concentration decreases. As this occurs, the odor intensity weakens and eventually becomes so low that the detection or recognition of the odor is quite difficult. At some point during dilution, the concentration of the odorant reaches a detection threshold. An odorant concentration below the detection threshold means that the concentration in the air is not detectable by the average human. (ECORP, 2021a, p. 50)

According to the SCAQMD, land uses commonly considered to be potential sources of obnoxious odorous emissions include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The proposed Project does not include any uses identified by the SCAQMD as being associated with odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities, use of diesel equipment, and the temporary storage of typical solid waste (refuse) associated with the proposed Project's long-term operational uses. (ECORP, 2021a, p. 50)

The Project would be subject to standard construction requirements, including the use of low-VOC architectural coatings as required by SCAQMD Rule 1113, *Architectural Coatings*; compliance with low sulfur fuel requirements pursuant to SCAQMD Rule 431.2, *Low Sulfur Fuel*; and compliance with SCAQMD Rule 402, *Nuisance*, which requires that a person shall not discharge air contaminants or other materials that would cause health or safety hazards to any considerable number of persons or the public. Compliance with these standard construction requirements would minimize odor impacts from construction. The construction odor



emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of construction and is thus considered less than significant.

Potential sources of operational odors generated by the Project would include disposal of miscellaneous commercial refuse and the use of diesel equipment. All Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the County's solid waste regulations, thereby precluding substantial generation of odors due to temporary holding of refuse on site. Moreover, mandatory compliance with SCAQMD Rule 402 would prevent occurrences of odor nuisances associated with Project site operations. Furthermore, mitigation measures identified herein to address the Project's operational air quality emissions, which among other measures requires all outdoor cargo handling equipment to be powered by electricity, compressed natural gas, propane, or diesel-fueled engines that comply with the CARB/USEPA Tier 4 Engine standards for off-road vehicles or better (defined as emitting less than or equal to 0.015 grams per brake horsepower-hour [g/bhp-hr] for PM₁₀), also would serve to reduce operational-related odors and would help ensure operational-related odors are less than significant.

As such, the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.

4.3.5 CUMULATIVE IMPACT ANALYSIS

With exception of the issue of odors, the cumulative study area for air quality includes the County of Riverside and the SCAB. The SCAB is designated as a nonattainment area for State standards of O₃, PM₁₀, and PM_{2.5}. The region is also designated as a nonattainment area for federal standards of O₃ and PM_{2.5}. Cumulative growth in population, vehicle use, and industrial activity could inhibit efforts to improve regional air quality and attain the ambient air quality standards. Thus, with exception of odors, the setting for this cumulative analysis consists of the SCAB and associated growth and development anticipated in the air basin. For the issue of odors, the cumulative study area includes the Project site and lands in close proximity to the Project site, as odors diminish rapidly with distance from the source.

As discussed under the analysis of Threshold a., based on the level of air quality emissions anticipated for the proposed Project, prior to mitigation the Project would conflict with the SCAQMD AQMP. As other developments within the SCAB also may result in air quality emissions that exceeds the applicable SCAQMD thresholds of significance and thereby result in a conflict with the AQMP, the Project's impact due to a conflict with the 2016 SCAQMD AQMP would be cumulatively considerable.

As previously shown in Table 4.3-3, the CAAQS designate the Project region as nonattainment for O₃, PM₁₀, and PM_{2.5}, while the NAAQS designates the Project region as nonattainment for O₃ and PM_{2.5}. The AQMD has published a report on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*. In this report the AQMD clearly states (Page D-3):



“...the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or Environmental Impact Report (EIR). The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is $HI > 1.0$ while the cumulative (facility-wide) is $HI > 3.0$. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.”

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD’s recommended daily thresholds for project-specific impacts also would not cause a cumulatively-considerable increase in emissions for those pollutants for which the SCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual Project-related construction and operational emissions that exceed SCAQMD thresholds for Project-specific impacts would be considered cumulatively considerable.

The Project-specific evaluation of emissions presented under the analysis of Threshold b. demonstrates that Project construction-source NO_x emissions may exceed the regional thresholds of significance. Therefore, Project construction-source regional emissions of NO_x and CO are considered to be significant on a Project-specific and cumulatively-considerable basis.

As also discussed under the analysis of Threshold b., Project operational-source ROG and NO_x emissions would exceed applicable SCAQMD regional thresholds of significance. Per SCAQMD significance guidance, impacts due to emissions of ROG and NO_x at the Project level are also considered cumulatively-considerable and would persist over the life of the Project. It should be noted that NO_x and ROG emissions are O_3 precursors and would therefore contribute considerably to existing ozone non-attainment conditions within the SCAB. Therefore, the Project would result in a cumulatively-considerable significant impact persisting over the life of the Project due to regional emissions of ROG and NO_x .

As discussed under the analysis of Threshold c., Project-related construction and operational activities would not exceed the SCAQMD threshold of significance for cancer risks of 10 per one million, and would not exceed the acute or chronic hazard index of 1.0; thus, Project-related air quality emissions would not expose nearby sensitive receptors to substantial pollutant concentrations and impacts would be less-than-cumulatively considerable. The Project also would not exceed the SCAQMD LST thresholds during construction or long-term operation. Furthermore, the Project has no potential to cause or contribute to CO “hot spots”; thus, Project impacts due to CO “hot spots” would be less-than-cumulatively considerable.



With respect to odors, and as discussed under the analysis of Threshold d., the proposed Project would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances (including odors) during both construction and long-term operation, and would be subject to the County's solid waste regulations. Other developments within the cumulative study area similarly would be required to comply with SCAQMD Rule 402 and the solid waste regulations of the applicable jurisdictions. Therefore, Project impacts due to other emissions (such as those leading to odors) would be less-than-cumulatively considerable.

4.3.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Significant Direct and Cumulatively-Considerable Impact. Project-related construction activities have the potential to exceed the SCAQMD Regional Threshold of significance for NO_x, and under long-term operational conditions the Project has the potential to exceed the SCAQMD Regional Thresholds of significance for ROG and NO_x. Additionally, the Project would not be consistent with the population, housing, and employment growth projections utilized in the preparation of the 2016 AQMP. As such, the Project has the potential to result in a conflict with the SCAQMD 2016 AQMP, and impacts would be significant on both a direct and cumulatively-considerable basis.

Threshold b.: Significant Direct and Cumulatively-Considerable Impact. Emissions resulting from Project construction have the potential to exceed the SCAQMD Regional Threshold of 100 pounds per day for NO_x. Additionally, Project-related operational emissions would exceed the SCAQMD Regional Thresholds for ROG and NO_x under long-term operations. As previously described, ROG and NO_x are precursors of O₃, a pollutant for which the SCAB is classified nonattainment. As such, prior to mitigation, the Project would result in a cumulatively-considerable net increase of criteria pollutants (i.e., ROG and NO_x) for which the Project region is non-attainment under federal and State ambient air quality standards, and impacts would be significant on both a direct and cumulatively-considerable basis

Threshold c.: Less-than-Significant Impact. The Project would not expose sensitive receptors to cancer risks exceeding 10 per one million or non-carcinogenic hazards exceeding a chronic hazard index of 1.0 during either construction or long-term operation. The Project also would not exceed the SCAQMD LST thresholds during construction or long-term operation. Additionally, the Project would not cause or contribute to any CO "hot spots." Accordingly, the Project would not expose sensitive receptors, which are located within one (1) mile of the Project site, to substantial pollutant concentrations, and impacts would be less than significant.

Threshold d.: Less-than-Significant Impact. The Project does not propose land uses typically associated with emitting objectionable odors. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. Additionally, it is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the County's solid waste regulations. The proposed Project also would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances.



Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required.

4.3.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 403, "Fugitive Dust" by implementing the following dust control measures during construction activities, such as earth moving activities, grading, and equipment travel on unpaved roads. Prior to grading permit issuance, the County shall verify that the following notes are included on the grading plan. Project contractors shall be required to ensure compliance with the notes and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. These notes also shall be specified in bid documents issued to prospective construction contractors.
 - All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour (mph) per SCAQMD guidelines in order to limit fugitive dust emissions.
 - The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the midmorning, afternoon, and after work is done for the day.
 - The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 mph or less.
- The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 1113, *Architectural Coatings*, by requiring that all architectural coatings must consist of low VOCs (i.e., VOCs of less than 50 grams per liter [g/L]) unless otherwise specified in the Rule 1113.
- The Project is required to comply with applicable SCAQMD rules for construction activities on the Project site. In addition to the SCAQMD requirements listed above, additional SCAQMD Rules that are currently applicable during construction activity for this Project include but are not limited to: Rule 1403 (Asbestos); Rule 431.2 (Low Sulfur Fuel); and Rule 1186 / 1186.1 (Street Sweepers).
- The Project is required to comply with the provisions of SCAQMD Rule 402, "Nuisance" which requires that a person shall not discharge air contaminants or other materials that would cause health or safety hazards to any considerable number of persons or the public.



Mitigation

MM 4.3-1 As a condition of issuing grading or building permits, Riverside County shall require that the following measures be implemented during all construction activities on site:

- Any construction equipment used in Project construction and with a horsepower rating greater than 75 horsepower shall be California Air Resources Board (CARB) Tier 4 Certified, as set forth in Section 2423 of Title 13 of the California Code of Regulations, and Part 89 of Title 40 of the Code of Federal Regulations.
- All future construction activities on site shall adhere to the germane policy provisions in the County of Riverside Board of Supervisors Good Neighbor Policy for Logistics and Warehouse/Distribution Uses, whether said project proposes buildings of 250,000 square feet or not. Germane provisions include, but are not limited to, the following:
 - a. During construction activities on site, all heavy-duty haul trucks accessing the site shall have CARB-approved 2010 engines or newer approved CARB engine standards.
 - b. All excavators, graders, rubber-tired dozers, and similar “off-road” construction equipment shall be CARB Tier 3 Certified engines or better.
 - c. The maximum daily disturbance area (actively graded area) shall not exceed 10 acres per day.
 - d. Construction contractors shall utilize construction equipment, with properly operating and maintained mufflers, consistent with manufacturers’ standards.
 - e. The surrounding streets shall be swept on a regular basis to remove any construction related debris and dirt.
 - f. Appropriate dust control measures that meet the SCAQMD standards shall be implemented for grading and construction activity.
 - g. Construction equipment maintenance records and data sheets, which includes equipment design specifications and equipment emission control tier classifications, as well as any other records necessary to verify compliance with items a. through g., above, shall be kept onsite and furnished to the County upon request.
 - h. Construction Contractors shall prohibit truck drivers from idling more than five (5) minutes and require operators to turn off engines when not in use, in compliance with the California Air Resources Board regulations.

Project contractors shall be required to ensure compliance with these requirements and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. These requirements also shall be specified in bid documents issued to prospective construction contractors.



- MM 4.3-2 Prior to issuance of building permits for Tenant Improvements involving cold storage warehouse uses, Riverside County shall review the plans to ensure that electrical hookups are provided to eliminate idling of main and auxiliary engines during the loading and unloading process and provide for transport refrigeration units. Riverside County shall verify the installation of electrical hookups prior to final building inspection.
- MM 4.3-3 The minimum number of automobile electric vehicle (EV) charging stations required by the California Code of Regulations Title 24 shall be provided. In addition, and to facilitate the possible future installation of infrastructure that would charge the batteries that power the motors of electric-powered trucks, the following shall be installed:
- At Shell building permit, an electrical room(s) and/or exterior area(s) of the site shall be designated where future electrical panels would be located for the purpose of supplying power to on-site charging facilities for electric powered trucks. Conduit shall be installed from this designated area where the panel would be located to the on-site location where the charging facilities would be located where electric-powered trucks would park and connect to charging facilities to charge the batteries that power the motors of the electric-powered trucks.
 - At issuance of a building permit for Tenant Improvements, if the tenant is served by electric trucks, the electrical panel and charging units shall be installed, and the electrical wiring connections shall be made from the electrical panel to the charging units. If the tenant is not served by electric trucks, this requirement shall not apply.
- MM 4.3-4 Prior to final building inspection, Riverside County shall ensure that Install passenger car Electric Vehicle (EV) charging stations and designated carpool parking stalls have been installed per the provisions of the California Green Building Standards Code, along with an adequately sized electrical panel(s) and conduit to accommodate future EV charging stations at a minimum of 5 percent of the passenger car parking spaces.
- MM 4.3-5 All on-site outdoor cargo handling equipment (including yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site equipment) shall be required to be powered by electricity, compressed natural gas, propane, or diesel-fueled engines that comply with the CARB/USEPA Tier 4 Engine standards for off-road vehicles or better (defined as emitting less than or equal to 0.015 grams per brake horsepower-hour [g/bhp-hr] for PM₁₀) and all indoor cargo handling equipment shall be required to be powered by electricity, compressed natural gas, or propane. Use of indoor diesel-fueled equipment shall be prohibited. Developer and all successors also shall include these obligations in all building leases. The building owner and occupant shall allow periodic inspection of the site by the County of Riverside or its designee to confirm compliance. Electrical panels should be appropriately sized to allow for future expanded use.
- MM 4.3-6 In order to promote alternative fuels, and help support “clean” truck fleets, as part of future lease agreements the developer/successor-in-interest shall be required to provide building



occupants with information related to SCAQMD's Carl Moyer Program, or other such programs that promote truck retrofits or "clean" vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. Tenants shall be notified about the availability of: 1) alternatively fueled cargo handling equipment; 2) grant programs for diesel-fueled vehicle engine retrofit and/or replacement; 3) designated truck parking locations in the project vicinity; 4) access to alternative fueling stations proximate to the site that supply compressed natural gas; and 5) the United States Environmental Protection Agency's SmartWay program.

MM 4.3-7 All future operations on site shall adhere to the germane policy provisions in the Riverside County Board of Supervisors Policy F-3 ("Good Neighbor Policy" for Logistics and Warehouse/Distribution Uses). Applicable requirements of Policy F-3 shall be specified in future lease agreements with all future tenants, and future tenants shall be required to permit periodic inspection by Riverside County to ensure compliance. In addition, buildings smaller than 250,000 square feet shall comply with applicable policy provisions of the Good Neighbor Policy except as indicated below. Applicable feasible provisions of the Good Neighbor Policy that would serve to measurably reduce Project-related operational emissions include, but are not limited to, the following:

- Warehouse/distribution facilities greater than 250,000 square feet shall be designed to provide adequate on-site parking for commercial trucks and passenger vehicles and on-site queuing for trucks that is away from sensitive receptors. The general queuing and spill-over of trucks onto surrounding public streets shall be prevented. Commercial trucks shall not be parked in the public road right-of-way or nearby residential areas.
- Facility operators shall maintain records of their fleet equipment and ensure that all diesel-fueled Medium-Heavy Duty Trucks ("MHDT") and Heavy-Heavy Duty Trucks ("HHDT") accessing the site use year CARB 2010 or newer engines. The records shall be maintained on-site and be made available for inspection by the County.
- Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than five minutes; and 3) telephone numbers of the building facilities manager and CARB to report violations.
- Facility operators shall train their managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Signs shall be posted in the appropriate locations and/or handouts should be provided that show the locations of nearest food options, fueling, truck maintenance services, and other similar convenience services.



- Each Facility shall designate a Compliance Officer responsible for implementing the measures described herein and/or in the project conditions of approval and mitigation measures. Contact information shall be provided to the County and updated annually, and signs shall be posted in visible locations providing the contact information for the Compliance Officer to the surrounding community.
- The future applicants for any new facility larger than 250,000 square feet shall be required to enter into agreement with the County of Riverside to provide a supplemental funding contribution, which would be applied to further off set potential air quality impacts to the community and provide a community benefit. Said financial contribution will be determined by the Transportation and Land Management Agency based on the level of NO_x emissions estimated to generated. Said supplemental funding contribution will be collected on a one-time basis. Funds collected under said supplemental funding program will be subject to designation for use by the Board of Supervisors and will generally be used for projects that directly benefit the impacted community wherein the project is located. The types of projects that the Board of Supervisors may designate for use of these funds include, but are not limited to (1) projects that directly offset NO_x reductions above and beyond what is required by existing air quality regulations, (2) projects that generally improve air quality such as paving of dirt roads, installation of additional trees and landscaping, (3) projects that provide an enhanced buffer between the new facility and sensitive receptors, and (4) Projects that lead to reduced emissions by promoting alternate forms of transportation such as bicycle lanes, new sidewalks, bus turnouts, or other transit-related uses.

4.3.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold a.: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. As discussed below under the discussion of Threshold b., implementation of Mitigation Measures MM 4.3-1 and MM 4.3-2 would reduce the Project's construction-related air quality emissions to below the SCAQMD Regional Thresholds. However, even with implementation of Mitigation Measures MM 4.3-3 through MM 4.3-7, the Project's long-term operational emissions of ROG_s and NO_x, both of which also are ozone precursors, would remain above the SCAQMD Regional Thresholds. As such, the Project would potentially delay the timely attainment of the O₃ air quality standard and/or the AQMP emission reduction requirements. Additionally, the Project's proposed land uses are not consistent with the growth forecasts included in the 2016 SCAQMD AQMP. Thus, Project direct and cumulatively-considerable impacts due to a conflict with or obstruction of the SCAQMD 2016 AQMP would be significant and unavoidable.

Threshold b.: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Table 4.3-13, *Construction-Related Emissions With Mitigation*, shows the Project's expected construction emissions with implementation of Mitigation Measures MM 4.3-1 and MM 4.3-2. As shown, adherence to the required mitigation would ensure that the proposed Project would be constructed in a manner that daily pollutants would be generated at levels below SCAQMD significance thresholds. With implementation of the required mitigation, criteria pollutant emissions generated during construction of the proposed Project would not result



in a cumulatively-considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or State ambient air quality standard. Further, since the Project’s emissions would not exceed SCAQMD thresholds, no exceedance of the ambient air quality standards would occur, and no regional health effects from Project criteria pollutants would occur. As such, with implementation of the required mitigation, Project-related air quality impacts during construction would be reduced to less-than-significant levels. (ECORP, 2021a, p. 28)

Table 4.3-13 Construction-Related Emissions With Mitigation

Construction Year	Pollutant (pounds per day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Construction in 2021 (including offsite construction)	9.83	88.93	53.01	0.08	9.22	12.03
Construction in 2022	42.68	98.55	129.42	0.40	17.81	10.80
Construction in 2023	41.58	83.07	115.35	0.39	16.50	6.23
Construction in 2024	40.90	79.37	120.76	0.38	16.24	5.99
Construction in 2025	40.20	75.68	116.92	0.38	15.97	5.73
<i>SCAQMD Regional Significance Threshold</i>	75	100	550	150	150	55
Exceed SCAQMD Regional Threshold?	No	No	No	No	No	No

Source: CalEEMod version 2016.3.2; EMFAC2017. Refer to Attachment A to the Project’s AQA (*Technical Appendix B*) for Model Data Outputs.

Notes: Emission reduction/credits for construction emissions are applied based on the required implementation of SCAQMD Rule 403. The specific Rule 403 measures applied in CalEEMod include the following: sweeping/cleaning adjacent roadway access areas daily; washing equipment tires before leaving the construction site; water exposed surfaces three times daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. Building construction, paving, and painting are assumed to occur simultaneously. Construction emissions taken from the season (summer or winter) with the highest output. (ECORP, 2021a, Table 2-7)

Implementation of Mitigation Measures MM 4.3-3 through MM 4.3-7 would reduce the Project’s anticipated emissions of ROG and NO_x, but would not reduce emissions of these pollutants to below the SCAQMD Regional Thresholds. While these measures would reduce air pollutant emissions attributable to the Project, the exact reduction amount cannot be quantified for most. For some measures it would be overly speculative to quantify resulting emissions reductions. For instance, while the Project would install passenger car EV charging stations it cannot be determined how many zero emission vehicles would replace gasoline-fueled vehicles as a result. Additionally, in order to promote alternative fuels, and help support “clean” truck fleets, the developer/successor-in-interest at the Project must provide building occupants with information related to SCAQMD’s Carl Moyer Program, or other such programs that promote truck retrofits or “clean” vehicles. Yet it cannot be reasonably predicted how many clean trucks would replace diesel-fueled trucks as a result. With



other measures the reduction values cannot be quantified due to limitation in the modeling software, such as the requirement that all future cold storage warehousing be equipped with electrical hookups to eliminate idling of main and auxiliary engines during the loading and unloading process. The requirement that facility operators must maintain records of their fleet equipment and ensure that all diesel-fueled Medium-Heavy Duty Trucks (“MHDT”) and Heavy-Heavy Duty Trucks (“HHD”) accessing the site use year CARB 2010 or newer engines can be quantified and has been accounted for in Table 4.3-7 since the requirement is also mandated by Provision 4.1 of the County of Riverside Board of Supervisors’ *Good Neighbor Policy for Logistics and Warehouse/Distribution Uses*.

As indicated in Table 4.3-7, the majority of NO_x emissions associated with Project operations would result from vehicular traffic, and in particular truck traffic. Mobile source emissions are regulated by standards imposed by federal and State agencies, not local governments. No other mitigation measures related to vehicle tailpipe emissions are available that are within Riverside County’s jurisdictional authority and that are feasible for Riverside County to enforce and have a proportional nexus to the Project’s level of impact. With respect to ROG emissions, a majority of the Project’s ROG emissions (84.6%) are associated with area sources such as architectural coatings and consumer products. ROG emissions from consumer product (i.e., solvents used in cleaning supplies, kitchen aerosols, cosmetics, and toiletries) make up most of the area source emissions (approximately 88%). As with mobile sources, consumer products cannot be regulated by the County of Riverside. CARB is primarily responsible for controlling pollution from consumer products. As such, it is concluded that operation of the Project would generate ROG and NO_x emissions that would exceed the applicable SCAQMD regional air quality threshold on a daily basis. The Project’s operational-related NO_x and ROG emissions would cumulatively contribute to an existing air quality violation in the SCAB (i.e., ozone concentrations), as well as cumulatively contribute to the net increase of a criteria pollutant for which the SCAB is non-attainment (i.e., federal and State ozone concentrations). Accordingly, the Project’s long-term operational-related emissions of ROG and NO_x are concluded to result in a significant and unavoidable impact on both a direct and cumulatively-considerable basis.



4.4 BIOLOGICAL RESOURCES

The analysis in this Subsection is based, in part, on information from the report titled “Biological Technical Report for Renaissance Ranch Development Project” (herein, “BTR), prepared by Glenn Lukos Associates, Inc. (herein, “GLA”), and dated September 29, 2021 (GLA, 2021a). This report is included as *Technical Appendix C1* to this EIR. Additionally, the information in this Subsection is based in part on the Project’s, “Determination of Biologically Equivalent or Superior Preservation (DBESP) Analysis for Impacts to MSHCP Riparian/Riverine Areas, Renaissance Ranch Development Project,” also prepared by GLA, dated October 2021, and included as *Technical Appendix C2* to this EIR (GLA, 2021b).

4.4.1 EXISTING CONDITIONS

A. Prior Biological Surveys and Permits

The Project’s BTR relies in part on prior studies performed for the Project site between 2003 and 2005 by both L&L Environmental, Inc. (herein, “L&L”) and GLA. Studies performed by L&L included: (GLA, 2021a, p. 1)

- Habitat Assessment (November 2002);
- Site Assessment (March 2003);
- Oak Tree Survey (May 2003);
- Jurisdictional Wetland Delineation (May 2003, Revised Dec. 2003, Attached as Appendix C to the Project’s BTR);
- Focused Gnatcatcher Survey and Spring Botanical Surveys (May 2003);
- Focused Survey for the Least Bell’s Vireo (May – June 2003);
- Focused Gnatcatcher Survey (April 2004);
- Focused Spring Botanical Study (April 2004);
- Determination of Biological Equivalent or Superior Preservation (January 2005);
- Evaluation of Urban/Wildland Interface (January 2005);
- Revised Jurisdictional Wetland Delineation (May 2005);
- Focused California Gnatcatcher & Narrow Endemic Plant Surveys (May-June 2005);
- Nesting Season Burrowing Owl Survey (May – June 2005); and
- Focused Survey for the Least Bell’s Vireo and Southwestern Willow Flycatcher and Habitat for the Western Yellow-Billed Cuckoo (May – June 2005).

Additionally, L&L submitted a Habitat Evaluation and Acquisition Negotiation Strategy (HANS) application in 2003 which was approved in 2004 (GLA, 2021a, p. 1).

Prior studies were also performed for the Project by GLA in 2006, which included (GLA, 2021a, p. 1):

- Offsite jurisdictional delineation (March 2006, attached as Appendix D to the Project’s BTR);
- Burrowing Owl Surveys (May 2006); and



- Focused Gnatcatcher Surveys (April – May 2006)

Additionally, a Section 7 Consultation pursuant to the federal Endangered Species Act (ESA) was concluded on July 11, 2006. Site jurisdictional permit approvals included a 401 Water Quality Certification in 2005 (with amendments in 2005 and 2006, and a reissued certification in May 2019), a CWA Section 404 permit in 2005 (extended in 2010 and 2015), and a 1602 Streambed Alteration Agreement in 2004 (amended in 2013, reissued in 2015, and extended in 2019). (GLA, 2021a, pp. 1-2)

The Project site was approved for clearing and grubbing in late 2005, with impacts occurring from January to March 2007. While the entirety of the Project footprint was cleared of vegetation, grading did not occur. The Project's BTR (*Technical Appendix CI*) updates the focused surveys for least Bell's vireo and burrowing owl, in addition to a general biological update. (GLA, 2021a, p. 2)

The above-listed reports are available for review at the Riverside County Planning Department, located at 4080 Lemon Street, 12th Floor, Riverside, CA 92501. The on- and off-site jurisdictional delineations relied upon by the Project's BTR are included as Appendices C and D to the BTR, respectively.

B. Study Area Conditions

The Project site is located east of Horsethief Canyon Road, south of Interstate 15 (I-15), north of Palomino Creek Drive, and north and west of Hostettler Road. The southeast portion of the Project site was partially used for agricultural uses including orchards from as early as the 1960s to 1997 (Hillmann, 2019, p. 17). Some debris still remains from a few former agricultural type structures in the southern portions of the site. Two former residences were observed in the northern portion of the site as well as a former truck trailer storage facility. Several informal dirt trails traverse the property. (Google Earth, 2018; Petra, 2020, pp. 3-4)

The southwestern portions of the Project site exhibit relatively level topography, with the remaining portions of the site containing undulating small hill forms. The property descends at a moderate gradient, generally in a northeasterly direction. Elevations on site range from approximately 1,187 feet above mean sea level (amsl) near the northeast corner of the Project site to 1,430 feet amsl at the southwest corner of the Project site. The overall topographic relief is approximately 243 feet. (Google Earth, 2018; Petra, 2020, p. 2)

The Temescal Wash crosses the northeastern portion of the Project site as it flows northerly under the I-15 Freeway. Other smaller natural watercourses cross the Specific Plan and generally flow from south to north. More specifically, under existing conditions, the Project site contains eleven separate drainage areas. These drainage areas convey runoff to seven (7) runoff concentration points with existing culverts traversing the I-15 freeway to Temescal Wash and Alberhill Creek/Temescal Wash to the north. (K&A, 2020a, p. 20)

C. Vegetation Mapping

The Project site and off-site improvement areas (herein, "Study Area") support the following vegetation types: Brittle Bush Scrub, Disturbed California Buckwheat Scrub, Disturbed Chamise Chaparral, Southern Cottonwood Willow Riparian Forest, Unvegetated Wash, and Upland Mustards. Figure 4.4-1, *Vegetation Map*,



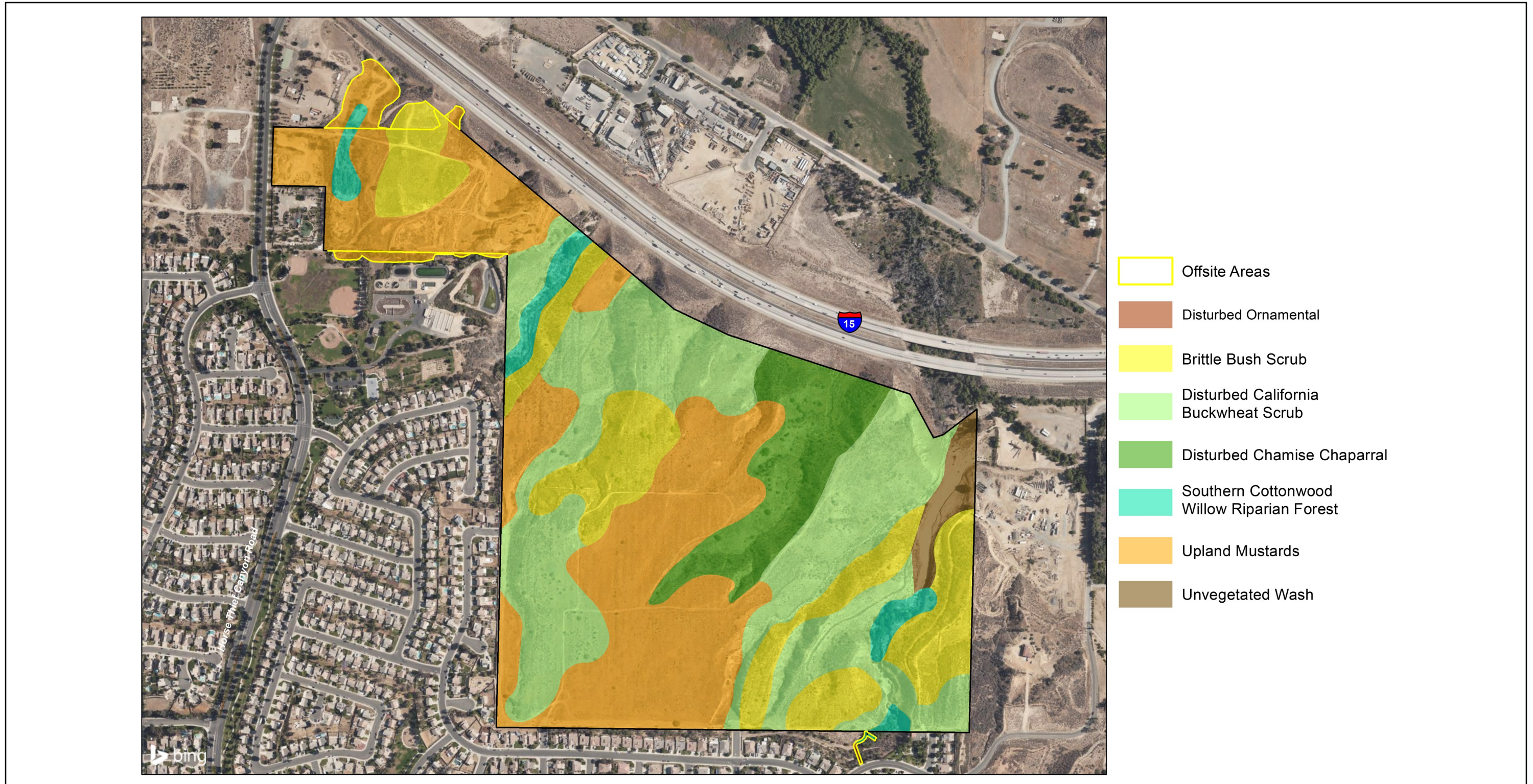
depicts the location and extent of vegetation communities on site. Table 4.4-1, *Summary of Vegetation/Land Use Types for the Study Area*, provides a summary of the vegetation types and their corresponding acreage. Descriptions of each vegetation type are provided below. Photographs depicting the Project site are shown in Exhibit 8 of the Project’s BTR (*Technical Appendix C1*). (GLA, 2021a, p. 25)

Table 4.4-1 Summary of Vegetation/Land Use Types for the Study Area

VEGETATION/LAND USE TYPE	PROJECT SITE (onsite acres)	PROJECT SITE (offsite acres)	AVOIDED OPEN SPACE (acres)	STUDY AREA (acres)
Brittle Bush Scrub	18.74	0.74	10.87	30.35
Disturbed California Buckwheat Scrub	33.81	0.01	18.24	52.06
Disturbed Chamise Chaparral	11.31	0	3.01	14.32
Southern Cottonwood Willow Riparian Forest	3.07	0.29	1.98	5.34
Unvegetated Wash	0	0	3.47	3.47
Upland Mustards	49.55	2.69	2.95	55.19
Disturbed Ornamental	0	0.04	0	0.04
Total	116.52	3.77	40.52	160.77

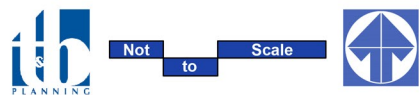
(GLA, 2021a, Table 4-1)

- Brittle Bush Scrub.** The Study Area supports 30.35 acres of brittle bush scrub, of which 19.48 acres occur within the Project site, and 10.87 acres occur within avoided open space. These areas do not typically undergo annual maintenance, and some of these areas were not historically used for agricultural purposes. Most plants in these areas are shrubs, though some trees are present. Dominant species in these areas include brittlebush (*Encelia farinosa*), California sagebrush (*Artemisia californica*), and California buckwheat (*Eriogonum fasciculatum*). Additional native species within these areas include black sage (*Salvia mellifera*), blue elderberry (*Sambucus nigricans*), chaparral yucca (*Hesperoyucca whipplei*), coast live oak (*Quercus agrifolia*), coulter’s matilija poppy (*Romneya coulteri*), golden yarrow (*Eriophyllum confertiflorum*), laurel sumac (*Malosma laurina*), matchweed (*Gutierrezia sarothrae*), toyon (*Heteromeles arbutifolia*), western sunflower (*Helianthus annuus*), and white sage (*Salvia apiana*). Non-native species within these areas are Peruvian pepper (*Schinus molle*) and summer mustard (*Hirschfeldia incana*). (GLA, 2021a, pp. 25-26)
- Disturbed California Buckwheat Scrub.** The Study Area supports 52.06 acres of disturbed California buckwheat scrub. Portions of these areas, particularly in the southwestern portion of the site, were annually maintained until 2006, with some areas being historically used for agricultural purposes. Most plants in these areas are shrubs, though some trees are sporadically distributed throughout. Predominant species in these areas include native California sagebrush, California buckwheat and deerweed, and non-native summer mustard and tocalote. Additional native species within these areas include arroyo willow (*Salix lasiolepis*), black sage, blue elderberry, brittlebush, Coulter’s matilija



Source(s): GLA (10-14-2020)

Figure 4.4-1





poppy, jimsonweed (*Datura wrightii*), laurel sumac, salt heliotrope, and telegraph weed (*Heterotheca grandiflora*). Additional non-native species include olive (*Olea europaea*), Peruvian pepper, prickly lettuce, and tamarisk (*Tamarix* sp.). (GLA, 2021a, p. 26)

- **Disturbed Chamise Chaparral.** The Study Area supports 14.32 acres of disturbed chamise chaparral. These areas, located in the central, northern portions of the Study Area, are primarily associated with hillslopes and existing drainages. Although these areas were not historically used for agricultural purposes and have not been annually maintained, they are considered disturbed due to the elevated presence of invasive species, which comprise approximately 50% cover. Predominant species in these areas include native chamise (*Adenostoma fasciculatum*), California buckwheat, black sage, and non-native tocalote (*Centaurea melitensis*) and summer mustard. Additional native species within these areas include California sagebrush, deerweed (*Acmispon glaber*), salt heliotrope (*Heliotropium curassavicum*), golden yarrow, and white sage. Additional non-native species in these areas include red brome (*Bromus rubens*) and prickly lettuce (*Lactuca serriola*). (GLA, 2021a, p. 26)
- **Southern Cottonwood Willow Riparian Forest.** The Study Area supports 5.34 acres of southern cottonwood willow riparian forest, primarily associated with the on- and off-site drainage features. These areas are dominated by native riparian tree species with associated understories present. Predominant species in these areas include Fremont's cottonwood (*Populus fremontii*), black willow (*Salix gooddingii*), arroyo willow, and tamarisk trees. Additional native species include blue elderberry, mulefat (*Baccharis salicifolia*), California sagebrush, brittlebush, California buckwheat, western sunflower, California fan palm (*Washingtonia filifera*), and coast live oak. Non-native species, such as prickly lettuce, also are present. (GLA, 2021a, p. 27)
- **Unvegetated Wash.** The Study Area supports 3.47 acres of bare areas. These areas are composed of unvegetated sand at the bottom of drainage features in the northeast portion of the Project site. (GLA, 2021a, p. 27)
- **Upland Mustards.** The Study Area supports 55.19 acres of upland mustards areas, primarily associated with those areas which were historically used for agricultural purposes. These areas are dominated by non-native species or ornamental species, though some native species still occur in small patches. Predominant species in these areas include summer mustard and red brome. Native species within these areas include clustered tarweed (*Deinandra fasciculatum*), coyote brush (*Baccharis pilularis*), horseweed (*Erigeron canadensis*), and thick-leaved yerba santa (*Eriodictyon crassifolium*). Non-native species in these areas include Canarian sea lavender (*Limonium perezii*), European sea lavender (*Limonium duriusculum*), gum tree (*Eucalyptus* sp.), Mediterranean grass (*Schismus barbatus*), red-stemmed filaree (*Erodium cicutarium*), tamarisk, tocalote, and white horehound (*Marrubium vulgare*). (GLA, 2021a, p. 27)
- **Disturbed/Developed Ornamental.** The Study Area supports 0.04 acre of disturbed/developed ornamental habitat. These areas are located on an existing slope off site south of the Project site near



Bolo Court and support nonnative grasses and Eucalyptus species (*Eucalyptus* sp.). (GLA, 2021a, p. 27)

D. Special Status Vegetation Communities

The California Natural Diversity Database (CNDDDB) identifies the following 10 special-status vegetation communities for the Alberhill and surrounding quadrangle maps: valley needlegrass grassland, southern interior basalt flow vernal pool, southern riparian forest, southern coast live oak riparian forest, southern cottonwood willow riparian forest, southern mixed riparian forest, canyon live oak ravine forest, southern sycamore alder riparian woodland, southern willow scrub, and southern interior cypress forest. Of these special-status vegetation types, the Project site contains only southern cottonwood willow riparian forest. Approximately 5.32 acres of southern cottonwood willow riparian forest occurs within the Study Area, of which 3.34 acres occur within the Project site and 1.98 occurs in avoided open space. (GLA, 2021a, pp. 27-28)

E. Special Status Plants

Table 4-2 of the Projects' BTR (*Technical Appendix C1*) provides a list of special-status plants evaluated for the Project site through general biological surveys and habitat assessments. Species were evaluated based on the following factors: 1) species identified by the CNDDDB and CNPS as occurring (either currently or historically) on or in the vicinity of the Project site, 2) applicable Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) survey areas, and 3) any other special-status plants that are known to occur within the vicinity of the Project site, or for which potentially suitable habitat occurs within the site. (GLA, 2021a, p. 28)

1. Special-Status Plants Detected Within the Study Area

One special status plant species, Coulter's Matilija Poppy (*Romneya coulteri*), was observed within the Study Area. Specifically, two small populations were detected during general and focused surveys. The Study Area supports approximately 96.77 acres of potential habitat (brittle bush scrub, disturbed chamise chaparral, disturbed California buckwheat scrub) for the Coulter's matilija poppy. (GLA, 2021a, p. 34)

Coulter's matilija poppy is designated as a California Native Plant Society (CNPS) Rank 4.2 species and is a covered species under the MSHCP without additional survey or conservation requirements. Coulter's matilija poppy is not a federal- or State-listed species. Coulter's matilija poppy is a member of the poppy family (PAPAVERACEAE). This perennial herb is known to occur in chaparral and coastal scrub from 20 to 1,200 meters (66 to 3,940 feet) above mean sea level (amsl) and is known as a fire follower species. Coulter's matilija poppy is known from Los Angeles, Orange, Riverside and San Diego counties and is known to bloom from March through July. (GLA, 2021a, p. 34)

2. Special-Status Plant Species Not Observed but with a Potential to Occur

Subsection 4.4.2 of the Project's BTR (*Technical Appendix C1*) includes a discussion of special-status plant species not observed but with a potential to occur within the Study Area. These species include intermediate



mariposa lily (*Romneya coulteri*), long-spined spineflower (*Chorizanthe polygonoides* var. *longispina*), many-stemmed dudleya (*Dudleya multicaulis*), Munz's onion (*Allium munzii*), Palmer's grapplinghook (*Harpagonella palmeri*), round-leaved filaree (*California macrophylla*), and San Miguel savory (*Clinopodium chandleri*). (GLA, 2021a, pp. 34-37)

F. Special-Status Animals

The following special-status animals were detected at the Project site during the 2020 biological surveys: coast horned lizard and coastal California gnatcatcher. Table 4-3 of the Project's BTR (*Technical Appendix C1*) provides a list of special-status animals evaluated for the Project site through general biological surveys, habitat assessments, and focused surveys. Species were evaluated based on the following factors, including: 1) species identified by the CNDDDB as occurring (either currently or historically) on or in the vicinity of the Project site; 2) applicable MSHCP survey areas; and 3) any other special-status animals that are known to occur within the vicinity of the Project site, for which potentially suitable habitat occurs on the site. (GLA, 2021a, p. 37)

1. Special-Status Wildlife Species Observed within the Project Site

Provided below is a description of the special-status animals detected at the Project site during the 2020 biological surveys.

- **Coast Horned Lizard (*Phrynosoma blainvillii*)**. The coast horned lizard is designated as a California Department of Fish and Wildlife (CDFW) Species of Special Concern (SSC) and is a covered species under the MSHCP. This species is found in a wide variety of vegetation types including coastal sage scrub, annual grassland, chaparral, oak woodland, riparian woodland, and coniferous forest. In inland areas, this species is restricted to areas with pockets of open microhabitat, created by disturbance (e.g., floods, fire, roads, grazed areas, fire breaks). Extensive habitat loss from agriculture and urbanization have been the main reasons cited for the decline of this species. There is approximately 96.77 acres of potential habitat (brittle bush scrub, disturbed chamise chaparral, disturbed California buckwheat scrub) within the Study Area. The coast horned lizard was detected during the 2020 surveys. (GLA, 2021a, p. 43)
- **Coastal California Gnatcatcher (*Polioptila californica californica*)**. The coastal California gnatcatcher (gnatcatcher) is designated as a federally threatened species, a CDFW SSC, and is a covered species under the MSHCP. The gnatcatcher typically occurs in or near sage scrub habitat, which is a broad category of vegetation that includes the following plant communities: Venturan coastal sage scrub, Diegan coastal sage scrub, maritime succulent scrub, Riversidean sage scrub, Riversidean alluvial fan sage scrub, southern coastal bluff scrub, and coastal sage-chaparral scrub. Gnatcatchers also use chaparral, grassland, and riparian or alluvial habitats where they occur adjacent to sage scrub. There is approximately 96.77 acres of potential habitat (brittle bush scrub, disturbed chamise chaparral, disturbed California buckwheat scrub) within the Study Area. Annual focused surveys for the gnatcatcher were performed by both L&L and GLA from 2003 to 2006. One pair of gnatcatchers was detected on site in 2006. The coastal California gnatcatcher was also detected during



2020 surveys but is considered a covered species adequately conserved under the MSHCP. (GLA, 2021a, p. 43)

2. **Special-Status Wildlife Species Not Observed but with a Potential to Occur**

Special-status wildlife species that were not observed within the Study Area but have the potential to occur are discussed below.

Special-Status Invertebrates with a Potential to Occur

- **Quino Checkerspot Butterfly (*Euphydryas editha quino*; “QCB”)**. The federally-listed endangered QCB was listed in 1997, and is currently a covered species under the MSHCP. Currently, QCB is known only from scattered locations in San Diego and western Riverside counties, and northwestern Baja California, Mexico. QCB have two distinctive phases in its life history: early stages (egg, larva or caterpillar, and the pupa or chrysalis) and adult. Each phase has distinct habitat requirements. Habitat associations seem to be tied to both host plant species and topography. Larvae feed immediately upon *Plantago erecta*, *Plantago patagonia*, *Antirrhinum coulterianum*, *Cordylanthus rigidus* and possibly other *Plantago* species and *Collinsia concolor*, and *Castilleja exserta* which have been shown to support larvae in the laboratory. Additionally, *Collinsia* spp. and *Castilleja* spp. are larval food plants for other *Euphydryas editha* subspecies. After diapause, the larvae feed again on *Plantago erecta* before metamorphosing. After metamorphosing, the adult’s nectar mostly on small annuals. The Project site has previously been identified as an area that has historically supported QCB. There is approximately 30.35 acres of potential habitat (brittle bush scrub) within the Study Area. (GLA, 2021a, p. 44)

Special-Status Reptiles with a Potential to Occur

- **Coast Patch-Nosed Snake (*Salvadora hexalepis virgultea*)**. The coast patch-nosed snake is designated as a CDFW SSC. The coast patch-nosed snake is thought to be associated with brushy or shrubby vegetation, such as chaparral. If the assessment that this species adjusts its activity around that of its whiptail lizard prey, the link to shrubby associations may simply be a function that being the preferred habitat of its prey. Whatever the link, coast patch-nosed snakes seem to require at least a low shrub structure of minimum density since they are not found in habitats lacking this structural component. Coast patch-nosed snakes are presumed to take refuge and perhaps overwinter in burrows or woodrat nests, so the presence of one or more burrow- or refuge-creating mammals may be necessary for this snake to be present. There is approximately 14.32 acres of potential habitat (disturbed chamise chaparral) within the Study Area. (GLA, 2021a, p. 44)
- **Red-diamond rattlesnake (*Crotalus ruber*)**. The red-diamond rattlesnake is designated as a CDFW SSC and is a covered species under the MSHCP without additional survey or conservation requirements. From an ecological standpoint, the rattlesnake has a wide tolerance for varying environments. Although this species is recorded from a number of vegetation types, it is most commonly associated with heavy brush with large rocks or boulders. Dense chaparral in the foothills,



cactus or boulder associated coastal sage scrub, and desert slope scrub associations are known to carry populations of this species; however, chamise and red shank associations may offer better structural habitat for refuges and food resources for this species than other habitats. There is approximately 14.32 acres of potential habitat (disturbed chamise chaparral) within the Study Area. (GLA, 2021a, pp. 44-45)

Special-Status Birds with a Potential to Occur

- **Loggerhead Shrike (*Lanius ludovicianus*)**. The loggerhead shrike is designated as a CDFW SSC when nesting, and is a covered species under the MSHCP. The loggerhead shrike is known to forage over open ground within areas of short vegetation, pastures with fence rows, old orchards, mowed roadsides, cemeteries, golf courses, riparian areas, open woodland, agricultural fields, desert washes, desert scrub, grassland, broken chaparral, and beach with scattered shrubs. Individuals like to perch on posts, utility lines and often use the edges of denser habitats. In some parts of its range, pasture lands have been shown to be a major habitat type for this species, especially during the winter season, and breeding pairs appear to settle near isolated trees or large shrubs. There is approximately 96.77 acres of potential habitat (brittle bush scrub, disturbed chamise chaparral, disturbed California buckwheat scrub) within the Study Area. (GLA, 2021a, p. 45)
- **Northern Harrier (*Circus cyaneus*)**. The northern harrier is designated as a CDFW SSC when nesting, and is a covered species under the MSHCP. In California, the northern harrier occurs from annual grassland up to lodgepole pine and alpine meadow habitats, as high as 3,000 meters (10,000 feet). It breeds from sea level to 1,700 meters (0-5,700 feet) in the Central Valley and Sierra Nevada, and up to 800 meters (3,600 feet) in northeastern California. The northern harrier frequents open wetlands, wet and lightly grazed pastures, old fields, dry uplands, upland prairies, mesic grasslands, drained marshlands, croplands, shrub-steppe, meadows, grasslands, open rangelands, desert sinks, fresh and saltwater emergent wetlands and is seldom found in wooded areas. While it seems to prefer to nest in the vicinity of marshes, rivers, or ponds, it may be found nesting in grassy valleys or on grass and sagebrush flats many miles from the nearest water. There is approximately 96.77 acres of potential habitat (brittle bush scrub, disturbed chamise chaparral, disturbed California buckwheat scrub) within the Study Area. (GLA, 2021a, p. 45)
- **White-Tailed Kite (*Elanus leucurus*)**. The white-tailed kite does not have a federal or State designation; however, this species is considered locally rare when nesting. It is also designated as a covered species under the MSHCP. The white-tailed kite inhabits low elevation, open grasslands, savannah-like habitats, agricultural areas, wetlands, and oak woodlands. Riparian areas adjacent to open areas are used for nesting. The white-tailed kite uses trees with dense canopies for cover and the specific plant associations seem to be unimportant with the vegetation structure and prey abundance apparently more important. There is approximately 96.77 acres of potential habitat (brittle bush scrub, disturbed chamise chaparral, disturbed California buckwheat scrub) within the Study Area. (GLA, 2021a, pp. 45-46)



Special-Status Mammals with a Potential to Occur

- **Northwestern San Diego Pocket Mouse (*Chaetodipus fallax fallax*).** The northwestern San Diego pocket mouse is designated as a CDFW SSC and is a covered species under the MSHCP. The northwestern San Diego pocket mouse inhabits coastal sage scrub, sage scrub/grassland ecotones, and chaparral communities. It inhabits open, sandy areas of both the Upper and Lower Sonoran life-zones of southwestern California and northern Baja California. The highest populations of the San Diego pocket mouse were recorded in coastal sage scrub supporting a mixture of coastal sagebrush (*Artemisia californica*) and California buckwheat (*Eriogonum fasciculatum*) on the Naval Weapons Station, Fallbrook Annex in northwestern San Diego County, but it was also relatively abundant in chaparral. The San Diego pocket mouse generally exhibits a strong microhabitat affinity for moderately gravelly and rocky substrates, and, to a lesser extent, shrubby areas. There is approximately 52.06 acres of potential habitat (disturbed California buckwheat scrub) in the Study Area. (GLA, 2021a, p. 46)
- **San Diego Desert Woodrat (*Neotoma lepida intermedia*).** The San Diego desert woodrat is designated as a CDFW SSC and is a covered species under the MSHCP. Desert woodrats are found in a variety of shrub and desert habitats, primarily associated with rock outcroppings, boulders, cacti, or areas of dense undergrowth. Desert woodrats are noted for their flexibility or plasticity in utilizing various materials, such as twigs and other debris (sticks, rocks, dung), to build elaborate dens or "middens," which typically include several chambers for nesting and food, as well as several entrances. Middens may be used by several generations of woodrats. Woodrats often are associated with cholla cactus which they use for water and dens or boulders and boulder piles. In chaparral, rock dens usually are located near primary food sources to minimize travel time and exposure to predators. The most common natural habitats for this species are chaparral, coastal sage scrub (including Riversidean sage scrub and Diegan coastal sage scrub) and grassland. Where substantial patches of these habitats are still intact, desert woodrats should still occur. There is approximately 96.77 acres of potential habitat (brittle bush scrub, disturbed chamise chaparral, disturbed California buckwheat scrub) within the Study Area. (GLA, 2021a, pp. 46-47)
- **Stephens' Kangaroo Rat (*Dipodomys stephensi*).** The Stephens' kangaroo rat (SKR) is designated as a federally-endangered species and a State-threatened species, and is a covered species under the MSHCP. The Stephens' kangaroo rat is found almost exclusively in open grasslands or sparse shrublands with cover of less than 50 percent during the summer. Although there are no confirmatory data, it has been assumed that the Stephens' kangaroo rat historically occupied habitat dominated by native perennial grasses and forbs. Soil type also is an important habitat factor for Stephens' kangaroo rat occupation. As a fossorial (burrowing) animal, the Stephens' kangaroo rat typically is found in sandy and sandy loam soils with a low clay to gravel content, although there are exceptions where they can utilize the burrows of Botta's pocket gopher (*Thomomys bottae*) and California ground squirrel (*Spermophilus beecheyi*). Additionally, the Stephens' kangaroo rat has been trapped in brittlebush (*Encelia farinosa*) dominated coastal sage scrub with an estimated shrub cover of over 50 percent. There is approximately 30.35 acres of potential habitat (brittle bush scrub) in the Study Area. (GLA, 2021a, p. 47)



3. **Special-Status Wildlife Species Confirmed Absent Through Focused Surveys**

The following special-status wildlife species were confirmed absent through focused surveys conducted within the Project's Study Area.

Special-Status Bird Species Confirmed Absent from Study Area

- **Burrowing Owl (*Athene cunicularia hypugaea*).** The burrowing owl is designated as a CDFW SSC at burrow sites and some wintering sites. The burrowing owl is a covered species not adequately conserved under the MSHCP, which means that projects located within the burrowing owl survey area may have to evaluate avoidance measures if burrowing owls are present. The burrowing owl occurs in shortgrass prairies, grasslands, lowland scrub, agricultural lands (particularly rangelands), prairies, coastal dunes, desert floors, and some artificial, open areas as a year-long resident. They require large open expanses of sparsely vegetated areas on gently rolling or level terrain with an abundance of active small mammal burrows. As a critical habitat feature need, they require the use of rodent or other burrows for roosting and nesting cover. The northwestern portion of the Project site occurs within the MSHCP survey area for the burrowing owl; therefore, focused surveys were conducted in 2004 and 2005 by L&L. No burrowing owls or sign of burrowing owls were detected at that time. In August 2020, updated focused burrowing owl surveys were performed by GLA pursuant to the MSHCP. GLA biologists did not observe burrowing owls, or evidence of burrowing owls (e.g., cast pellets, preened feathers, or whitewash clustered at a burrow) during the focused burrowing owl surveys conducted in 2020. Exhibit 5 of the Project's BTR (*Technical Appendix C1*) depicts the location of the burrowing owl survey areas and of burrows detected during the focused burrow survey. This species was confirmed absent from the burrowing owl study area. (GLA, 2021a, pp. 47-48)
- **Least Bell's Vireo (*Vireo bellii pusillus*).** The least Bell's vireo is designated as a federally and State endangered species. The least Bell's vireo is a covered species not adequately conserved under the MSHCP, which means that projects with wetland mapping components may have to evaluate avoidance measures if least Bell's vireo are present. Least Bell's vireos primarily occupy riverine riparian habitats that typically feature dense cover within 1-2 meters of the ground and a dense, stratified canopy. It inhabits low, dense riparian growth along water or along dry parts of intermittent streams. Typically, it is associated with southern willow scrub, cottonwood forest, mule fat scrub, sycamore alluvial woodland, coast live oak riparian forest, arroyo willow riparian forest, wild blackberry, or mesquite in desert localities. It uses habitat which is limited to the immediate vicinity of water courses below 1,500 feet elevation in the interior. In the coastal portions of Southern California, the least Bell's vireo occurs in willows and other low, dense valley foothill riparian habitat and lower portions of canyons and along the western edge of the deserts in desert riparian habitat. As the site contains riparian habitat, the site has the potential to support the least Bell's vireo. Therefore, in 2003, 2004, and 2005, focused least Bell's vireo surveys were performed by L&L. In 2003, one least Bell's vireo was detected offsite within the Temescal Wash, although none were detected on site. No vireos were detected during focused surveys in 2004 or 2005, or during updated focused surveys conducted by GLA in 2020. (GLA, 2021a, p. 48)



G. Raptor Use

The Project site provides suitable foraging and breeding habitat for a number of raptor species, including special-status raptors. Southern California holds a diversity of birds of prey (raptors), and many of these species are in decline. For most of the declining species, foraging requirements include extensive open, undisturbed, or lightly disturbed areas, especially grasslands. This type of habitat has declined severely in the region, affecting many species, but especially raptors. A few species, such as redtailed hawk (*Buteo jamaicensis*) and American kestrel (*Falco sparverius*), are somewhat adaptable to low-level human disturbance and can be readily observed adjacent to neighborhoods and other types of development. These species still require appropriate foraging habitat and low levels of disturbance in vicinity of nesting sites. (GLA, 2021a, p. 48)

Many of the raptors that would be expected to forage and nest within western Riverside County are fully covered species under the MSHCP with the MSHCP providing the necessary conservation of both foraging and nesting habitats. Some common raptor species (e.g., American kestrel, red-tailed hawk) are not covered by the MSHCP but are expected to be conserved with implementation of the MSCHP due to the parallel habitat needs with those raptors covered under the MSHCP. The MSHCP does not provide MBTA and Fish and Game Code take for raptors covered under the MSHCP. (GLA, 2021a, pp. 48-49)

The Project site provides potential nesting habitat (e.g., mature trees, shrubs) for the white-tailed kite and potential foraging for the northern harrier. Appendix B (faunal compendium) to the Project's BTR (*Technical Appendix C1*) provides a list of the hawks and falcons detected over the course of the field studies. These species were Cooper's hawk (*Accipiter cooperii*), red-tailed hawk (*Buteo jamaicensis*), American kestrel (*Falco sparverius*), and great-horned owl (*Bubo virginianus*). The Project site supports nesting habitat (e.g., mature trees, shrubs) for these species, primarily in the riparian areas on site. The Project site is expected to provide foraging habitat for all of these species in the form of insects, spiders, lizards, snakes, small mammals, and other birds. (GLA, 2021a, p. 49)

H. Nesting Birds

The Project site contains trees, shrubs, and ground cover that provide suitable habitat for nesting native birds. Mortality of native birds (including eggs) is prohibited under California Fish and Game Code. Birds anticipated to nest on the Project site would be those that are common to disturbed habitats, riparian habitats, and coastal sage scrub. These birds include mourning dove, Anna's hummingbird, American crow, common raven, Bewick's wren, rock wren, house finch, and lesser goldfinch. (GLA, 2021a, p. 49)

I. Wildlife Linkages/ Corridors and Nursery Sites

Habitat linkages are areas which provide a communication between two or more other habitat areas which are often larger or superior in quality to the linkage. Such linkage sites can be quite small or constricted, but may be vital to the long-term health of connected habitats. Linkage values are often addressed in terms of "gene flow" between populations, with movement taking potentially many generations. Corridors are similar to linkages but provide specific opportunities for individual animals to disperse or migrate between areas,



generally extensive but otherwise partially or wholly separated regions. Adequate cover and tolerably low levels of disturbance are common requirements for corridors. Habitat in corridors may be quite different than that in the connected areas, but if used by the wildlife species of interest, the corridor will still function as desired. (GLA, 2021a, p. 49)

Wildlife nurseries are sites where wildlife concentrate for hatching and/or raising young, such as rookeries, spawning areas, and bat colonies. Nurseries can be important to both special-status species as well as commonly occurring species. (GLA, 2021a, p. 50)

The eastern quarter of the Project site is identified by the MSHCP as being within a conceptual linkage or corridor. The Project site, therefore, may represent an area valuable to wildlife movement. The Project site does not represent a nursery site due to the disturbed nature of the site and its adjacent surrounding areas (residential areas). (GLA, 2021a, p. 50)

J. Critical Habitat

The Project site does not occur within any United States Fish and Wildlife Service (USFWS) designated critical habitat (GLA, 2021a, p. 50).

K. Jurisdictional Waters

The original study in 2003 performed by L&L found six drainage channels flowing from southwest to northeast. The six drainages varied from shallow to deeply incised and are tributary to Temescal Wash which borders the extreme northeastern portion of the Study Area. An updated study was conducted in 2004-2005 due to record rainfall during the 2004- 2005 wet season, and is included as Appendix C to the Project's BTR (EIR *Technical Appendix C1*). Additionally, GLA performed a jurisdictional delineation in 2006 for offsite drainages in the northwestern portion of the Project site, adding one additional drainage feature (refer to Appendix D to the Project's BTR). The jurisdictional features contained in the biological report are derived from GLA's interpretation of the Project's jurisdictional delineation report prepared by L&L dated May 2005, as well as the existing approved regulatory permits issued by the U.S. Army Corps of Engineers (Corps), Santa Ana Regional Water Quality Control Board (Regional Board), and CDFW for the Project. Finally, one 0.05-acre riparian area and 0.03 acre of wetland streambed located south of the Project site near Bolo Court was also identified. This area supports Southern Cottonwood-Willow Riparian Forest Habitat. (GLA, 2021a, p. 50)

1. Corps Jurisdictional Features

Corps jurisdiction associated with the Project site, which includes on and offsite areas, totals 3.26 acres (3.18 acres onsite, 0.08-acre offsite), 0.13 acre of which is wetland. A total of 10,800 linear feet of streambed is present. The Project site supports six features, including ephemeral streams/tributaries, erosional areas, and swales, that flow in direct response to precipitation (e.g., rain) or suburban runoff. One additional feature (Channel 7) occurs in the Offsite area. Table 4.4-2, *Summary of Corps Jurisdiction for the Onsite Areas*, provides a summary of Corps jurisdiction associated with the Project site, and Table 4.4-3, *Summary of Corps*



Jurisdiction for the Offsite Areas, provides a summary of Corps jurisdiction associated with the Offsite areas. (GLA, 2021a, p. 50)

Table 4.4-2 Summary of Corps Jurisdiction for the Onsite Areas

Channel Name	Non-Wetland Waters (acres)	Wetlands (acres)	Total (acres)	Length (linear feet)
Channel 1	0.02	0	0.02	200
Channel 2	0.22	0.10	0.32	900
Channel 3	0.41	0	0.41	2,500
Channel 4	0.11	0	0.11	700
Channel 5	0.34	0	0.34	2,200
Channel 6	1.98	0	1.98	3,600
Total	3.08	0.10	3.18	10,100

*See Table 2-b of the jurisdictional report by L&L, Inc. (GLA, 2021a, Table 4-4)

Table 4.4-3 Summary of Corps Jurisdiction for the Offsite Areas

Channel Name	Non-Wetland Waters (acres)	Wetlands (acres)	Total (acres)	Length (linear feet)
Channel 1	0.01	0	0.01	75
Channel 3	0.01	0	0.01	125
Channel 6	0	0.03	0.03	75
Channel 7	0.03	0	0.03	425
Total	0.05	0.03	0.08	700

(GLA, 2021a, Table 4-5)

Channel 1

Corps jurisdiction associated with Channel 1 totals 0.03 acre (0.02 acre onsite and 0.01 acre offsite), none of which consists of wetlands. The initial jurisdictional delineation performed by L&L in 2003 and revised in 2005 described Channel 1 as an ephemeral drainage vegetated primarily by upland species such as mustard with sporadic individuals of mulefat present, as well as scrub oaks and a coast live oak tree. The drainage originates on site and flows northeast for approximately 200 feet before entering into the Offsite Impacts area, where it flows for another 75 feet before exiting the Study Area. Flows originating from Channel 1 ultimately discharge off site into Temescal Canyon Wash, which is tributary to Corona Lake. The onsite portion of the drainage averages approximately 10 feet in width, while the offsite portion averages approximately 4 feet in width. Adjacent upland areas consisted of disturbed Riversidean sage scrub vegetated with California buckwheat and white sage; disturbed areas vegetated with ruderal vegetation and non-native grasses; and scrub oak chaparral vegetated with scrub oak (*Quercus berberidifolia*), chamise, and sugar bush (*Rhus ovata*). Current conditions on site have changed since the previous studies, as vegetation removals occurred in 2007. As of the 2020 surveys performed by GLA, vegetation within Channel 1 consisted primarily of brittle bush scrub and upland mustards as described in subsection 4.4.1.C, above. (GLA, 2021a, p. 51)



Channel 2

Corps jurisdiction associated with Channel 2 totals 0.32 acre (all onsite), 0.10 acre of which consists of wetlands. The initial jurisdictional delineation performed by L&L in 2003 and revised in 2005 described Channel 2 as an intermittent drainage vegetated primarily by dense southern willow woodland with an understory of mulefat thickets. The drainage arrives on the property through a storm drain on the western boundary adjacent to residential development and flows northeast for approximately 900 feet before exiting the Study Area. Flows from Channel 2 ultimately discharge off site into Temescal Canyon Wash, which is tributary to Corona Lake. After approximately 700 feet from its entrance into the Project site, Channel 2 becomes more sparsely vegetated, though consisting of the same component habitat. Current conditions on site have changed since the previous studies, as vegetation removals occurred in 2007. As of the 2020 surveys performed by GLA, vegetation within Channel 2 consisted primarily of southern cottonwood willow riparian forest as described in subsection 4.4.1.C, above. (GLA, 2021a, p. 52)

Channel 3

Corps jurisdiction associated with Channel 3 totals 0.42 acre (0.41 acre onsite and 0.01 acre offsite), none of which consists of wetlands. The initial jurisdictional delineation performed by L&L in 2003 and revised in 2005 described Channel 3 as an ephemeral drainage vegetated primarily by upland species such as mustards and bromes in the south, and by sage scrub and chamise community vegetation in the northern portions of the drainage feature. The drainage originates on site and flows northeast for approximately 2,500 feet before entering into the offsite impact area, where it flows for another 125 feet before exiting the Study Area. Flows originating from Channel 3 ultimately discharge off site into Temescal Canyon Wash, which is tributary to Corona Lake. The onsite portion of the drainage averages approximately 5 feet in width, while the offsite portion averages approximately 4 feet in width. Adjacent upland areas consisted of disturbed areas dominated by ruderal vegetation and non-native grasses, Riversidean sage scrub dominated by California sagebrush, and scrub oak/chamise chaparral vegetated with scrub oak, chamise, California sagebrush, California bush poppy (*Dendromecon rigida*), and thick-leaved lilac (*Ceanothus crassifolius*). Current conditions on site have changed since the previous studies, as vegetation removals occurred in 2007. As of the 2020 surveys performed by GLA, vegetation within Channel 3 consisted primarily of brittle bush scrub and disturbed California buckwheat scrub as described in subsection 4.4.1.C, above. (GLA, 2021a, p. 52)

Channel 4

Corps jurisdiction associated with Channel 4 totals 0.11 acre (all onsite), none of which consists of wetlands. The initial jurisdictional delineation performed by L&L in 2003 and revised in 2005 described Channel 4 as an ephemeral drainage vegetated primarily by dense coastal sage scrub and chamise chaparral. The drainage originates on the property and flows northeast for approximately 700 feet before exiting the Study Area. Flows from Channel 4 ultimately discharge off site into Temescal Canyon Wash, which is tributary to Corona Lake. Current conditions on site have changed since the previous studies, as vegetation removals occurred in 2007. As of the 2020 surveys performed by GLA, vegetation within Channel 4 consisted primarily of disturbed California buckwheat scrub and disturbed chamise chaparral as described in subsection 4.4.1.C, above. (GLA, 2021a, p. 53)



Channel 5

Corps jurisdiction associated with Channel 5 totals 0.34 acre (all onsite), none of which consists of wetlands. The initial jurisdictional delineation performed by L&L in 2003 and revised in 2005 described Channel 5 as an ephemeral drainage vegetated primarily by dense coastal sage scrub and chamise chaparral. The drainage originates on the property and flows northeast for approximately 2,200 feet before exiting the Study Area. Flows from Channel 5 ultimately discharge off site into Temescal Canyon Wash, which is tributary to Corona Lake. Current conditions on site have changed since the previous studies, as vegetation removals occurred in 2007. As of the 2020 surveys performed by GLA, vegetation within Channel 5 consisted primarily of disturbed California buckwheat scrub, disturbed chamise chaparral, and upland mustards as described in subsection 4.4.1.C, above. (GLA, 2021a, p. 53)

Channel 6

Corps jurisdiction associated with Channel 6 totals 2.01 acres (1.98 acres on site and 0.03 acre off site), none of which consists of wetlands. The initial jurisdictional delineation performed by L&L in 2003 and revised in 2005 described Channel 6 as an intermittent drainage vegetated primarily by dense willows and cottonwoods in the southern portion of the channel, which then thins into unvegetated streambed. The drainage originates from a suburban runoff storm drain along the southeast boundary of the Project and flows north for approximately 3,600 feet before exiting the Study Area. Flows from Channel 6 ultimately discharge off site into Temescal Canyon Wash, which is tributary to Corona Lake. Current conditions on site have changed since the previous studies, as vegetation removals occurred in 2007. As of the 2020 surveys performed by GLA, vegetation within Channel 6 has expanded further north than previously described. The southern cottonwood willow riparian forest present in Channel 6 during the 2020 surveys is described in subsection 4.4.1.C, above. (GLA, 2021a, pp. 53-54)

Channel 7

Corps jurisdiction associated with Channel 7 totals 0.03-acre (all offsite), none of which consists of wetlands. The initial jurisdictional delineation for Channel 7 performed by GLA in 2006 described Channel 7 as an ephemeral drainage vegetated primarily by arroyo willow, mulefat, and stinging nettle (*Urtica dioica*), as well as more sporadic areas of mulefat that support tree tobacco, castor bean, and salt cedar. The drainage originates at a culvert outlet in the southwest corner of the Offsite Impacts Area, and then extends approximately 425 linear feet north/northeast within the Offsite Impacts Area, at which point the channel then extends into the Interstate 15 right-of-way and enters a culvert pipe that conveys flows underneath the freeway and towards the Temescal Canyon Wash. Current conditions on site have remained relatively consistent with the previous studies. (GLA, 2021a, p. 54)

2. Regional Water Quality Control Board Jurisdictional Features

Regional Board jurisdiction associated with the Project site, which includes on and offsite areas, totals 3.26 acres, 0.13 acre of which is wetland. A total of 10,800 linear feet of streambed is present. The Project site supports six features, including ephemeral streams/tributaries, erosional areas, and swales, that flow in direct response to precipitation (e.g., rain) or suburban runoff. One additional feature (Channel 7) occurs in the Offsite



area. Table 4.4-4, *Summary of Regional Board Jurisdiction for the Onsite Areas*, provides a summary of Regional Board jurisdiction associated with the Project site, and Table 4.4-5, *Summary of Regional Board Jurisdiction for the Offsite Areas*, provides a summary of Regional Board jurisdiction associated with the Offsite areas. (GLA, 2021a, p. 54)

Table 4.4-4 Summary of Regional Board Jurisdiction for the Onsite Areas

Channel Name	Non-Wetland Waters (acres)	Wetlands (acres)	Total (acres)	Length (linear feet)
Channel 1	0.02	0	0.02	200
Channel 2	0.22	0.10	0.32	900
Channel 3	0.41	0	0.41	2,500
Channel 4	0.11	0	0.11	700
Channel 5	0.34	0	0.34	2,200
Channel 6	1.98	0	1.98	3,600
Total	3.08	0.10	3.18	10,100

*See Table 2-b of the jurisdictional report by L&L, Inc. (GLA, 2021a, Table 4-6)

Table 4.4-5 Summary of Regional Board Jurisdiction for the Offsite Areas

Channel Name	Non-Wetland Waters (acres)	Wetlands (acres)	Total (acres)	Length (linear feet)
Channel 1	0.01	0	0.01	75
Channel 3	0.01	0	0.01	125
Channel 6	0	0.03	0.03	75
Channel 7	0.03	0	0.03	425
Total	0.05	0.03	0.08	800

(GLA, 2021a, Table 4-7)

Channel 1

Regional Board jurisdiction associated with Channel 1 totals 0.03 acre (0.02 acre onsite and 0.01 acre offsite), none of which consists of wetlands. The initial jurisdictional delineation performed by L&L in 2003 and revised in 2005 described Channel 1 as an ephemeral drainage vegetated primarily by upland species such as mustard with sporadic individuals of mulefat present, as well as scrub oaks and a coast live oak tree. The drainage originates on site and flows northeast for approximately 200 feet before entering into the Offsite impact area, where it flows for another 75 feet before exiting the Study Area. Flows originating from Channel 1 ultimately discharge off site into Temescal Canyon Wash, which is tributary to Corona Lake. The onsite portion of the drainage averages approximately 10 feet in width, while the offsite portion averages approximately 4 feet in width. Adjacent upland areas consisted of disturbed Riversidean sage scrub vegetated with California buckwheat and white sage; disturbed areas vegetated with ruderal vegetation and non-native grasses; and scrub oak chaparral vegetated with scrub oak (*Quercus berberidifolia*), chamise, and sugar bush (*Rhus ovata*). Current conditions on site have changed since the previous studies, as vegetation removals



occurred in 2007. As of the 2020 surveys performed by GLA, vegetation within Channel 1 consisted primarily of brittle bush scrub and upland mustards as described in subsection 4.4.1.C, above. (GLA, 2021a, p. 55)

Channel 2

Regional Board jurisdiction associated with Channel 2 totals 0.32 acre (all onsite), 0.10 acre of which consists of wetlands. The initial jurisdictional delineation performed by L&L in 2003 and revised in 2005 described Channel 2 as an intermittent drainage vegetated primarily by dense southern willow woodland with an understory of mulefat thickets. The drainage arrives on the property through a storm drain on the western boundary adjacent to residential development and flows northeast for approximately 900 feet before exiting the Study Area. Flows from Channel 2 ultimately discharge off site into Temescal Canyon Wash, which is tributary to Corona Lake. After approximately 700 feet from its entrance into the Project site, Channel 2 becomes more sparsely vegetated, though consisting of the same component habitat. Current conditions on site have changed since the previous studies, as vegetation removals occurred in 2007. As of the 2020 surveys performed by GLA, vegetation within Channel 2 consisted primarily of southern cottonwood willow riparian forest as described in subsection 4.4.1.C, above. (GLA, 2021a, pp. 55-56)

Channel 3

Regional Board jurisdiction associated with Channel 3 totals 0.42 acre (0.41 acre onsite and 0.01 acre offsite), none of which consists of wetlands. The initial jurisdictional delineation performed by L&L in 2003 and revised in 2005 described Channel 3 as an ephemeral drainage vegetated primarily by upland species such as mustards and bromes in the south, and by sage scrub and chamise community vegetation in the northern portions of the drainage feature. The drainage originates on site and flows northeast for approximately 2,500 feet before entering into the Offsite impact area, where it flows for another 125 feet before exiting the Study Area. Flows originating from Channel 3 ultimately discharge off site into Temescal Canyon Wash, which is tributary to Corona Lake. The onsite portion of the drainage averages approximately 5 feet in width, while the offsite portion averages approximately 4 feet in width. Adjacent upland areas consisted of disturbed areas dominated by ruderal vegetation and non-native grasses, Riversidean sage scrub dominated by California sagebrush, and scrub oak/chamise chaparral vegetated with scrub oak, chamise, California sagebrush, California bush poppy (*Dendromecon rigida*), and thick-leaved lilac (*Ceanothus crassifolius*). Regional Board conditions on site have changed since the previous studies, as vegetation removals occurred in 2007. As of the 2020 surveys performed by GLA, vegetation within Channel 3 consisted primarily of brittle bush scrub and disturbed California buckwheat scrub as described in subsection 4.4.1.C, above. (GLA, 2021a, p. 56)

Channel 4

Regional Board jurisdiction associated with Channel 4 totals 0.11 acre (all onsite), none of which consists of wetlands. The initial jurisdictional delineation performed by L&L in 2003 and revised in 2005 described Channel 4 as an ephemeral drainage vegetated primarily by dense coastal sage scrub and chamise chaparral. The drainage originates on the property and flows northeast for approximately 700 feet before exiting the Study Area. Flows from Channel 4 ultimately discharge off site into Temescal Canyon Wash, which is tributary to Corona Lake. Current conditions on site have changed since the previous studies, as vegetation removals



occurred in 2007. As of the 2020 surveys performed by GLA, vegetation within Channel 4 consisted primarily of disturbed California buckwheat scrub and disturbed chamise chaparral as described in subsection 4.4.1.C, above. (GLA, 2021a, p. 56)

Channel 5

Regional Board jurisdiction associated with Channel 5 totals 0.34 acre (all onsite), none of which consists of wetlands. The initial jurisdictional delineation performed by L&L in 2003 and revised in 2005 described Channel 5 as an ephemeral drainage vegetated primarily by dense coastal sage scrub and chamise chaparral. The drainage originates on the property and flows northeast for approximately 2,200 feet before exiting the Study Area. Flows from Channel 5 ultimately discharge off site into Temescal Canyon Wash, which is tributary to Corona Lake. Current conditions on site have changed since the previous studies, as vegetation removals occurred in 2007. As of the 2020 surveys performed by GLA, vegetation within Channel 5 consisted primarily of disturbed California buckwheat scrub, disturbed chamise chaparral, and upland mustards as described in subsection 4.4.1.C, above. (GLA, 2021a, p. 57)

Channel 6

Regional Board jurisdiction associated with Channel 6 totals 2.01 acres (1.98 acres of which is on site and 0.03 acre of which is off site), none of which consists of wetlands. The initial jurisdictional delineation performed by L&L in 2003 and revised in 2005 described Channel 6 as an intermittent drainage vegetated primarily by dense willows and cottonwoods in the southern portion of the channel, which then thins into unvegetated streambed. The drainage originates from a suburban runoff storm drain along the southeast boundary of the Project and flows north for approximately 3,600 feet before exiting the Study Area. Flows from Channel 6 ultimately discharge off site into Temescal Canyon Wash, which is tributary to Corona Lake. Current conditions on site have changed since the previous studies, as vegetation removals occurred in 2007. As of the 2020 surveys performed by GLA, vegetation within Channel 6 has expanded further north than previously described. The southern cottonwood willow riparian forest present in Channel 6 during the 2020 surveys is described in subsection 4.4.1.C, above. (GLA, 2021a, p. 57)

Channel 7

Regional Board jurisdiction associated with Channel 7 totals 0.03-acre (all offsite), none of which consists of wetlands. The initial jurisdictional delineation for Channel 7 performed by GLA in 2006 described Channel 7 as an ephemeral drainage vegetated primarily by arroyo willow, mulefat, and stinging nettle (*Urtica dioica*), as well as more sporadic areas of mulefat that support tree tobacco, castor bean, and salt cedar. The drainage originates at a culvert outlet in the southwest corner of the Offsite Impacts Area, and then extends approximately 425 linear feet north/northeast within the Offsite Impacts Area, at which point the channel then extends into the Interstate 15 right-of-way and enters a culvert pipe that conveys flows underneath the freeway and towards the Temescal Canyon Wash. Current conditions on site have remained relatively consistent with the previous studies. (GLA, 2021a, pp. 57-58)



3. California Department of Fish and Wildlife Jurisdictional Features

CDFW jurisdiction associated with the Project site totals 8.10 acres (7.79 acres onsite, 0.31 acres offsite), 4.32 acres (4.04 acres onsite, 0.28-acre offsite) of which is riparian. A total of 10,800 linear feet (10,100 l.f. onsite, 700 l.f. offsite) of streambed is present. CDFW jurisdiction is limited to seven drainage features (Channel 1-7) that convey surface water in direct response to precipitation (e.g., rain) and have the potential to support aquatic resources. These features are considered streams with indicators that include a defined bed, bank, and channel, as well as changes in soil characteristics, sediment deposition, litter and debris wracking, and/or shelving. Table 4.4-6, *Summary of CDFW Jurisdiction for the Onsite Areas*, provides a summary of CDFW jurisdiction associated with the Project site, and Table 4.4-7, *Summary of CDFW Jurisdiction for the Offsite Areas*, provides a summary of CDFW jurisdiction associated with the Offsite areas. (GLA, 2021a, p. 58)

Table 4.4-6 Summary of CDFW Jurisdiction for the Onsite Areas

Channel Name	Non-Riparian Streambed (acres)	Riparian Habitat (acres)	Total (acres)	Length (linear feet)
Channel 1	0	0.03	0.03	200
Channel 2	0.66	0.28	0.94	900
Channel 3	0	1.19	1.19	2,500
Channel 4	0	0.24	0.24	700
Channel 5	0	0.75	0.75	2,200
Channel 6	3.09	1.55	4.64	3,600
Total	3.75	4.04	7.79	10,100

*See Table 2-b of the jurisdictional report by L&L, Inc. (GLA, 2021a, Table 4-8)

Table 4.4-7 Summary of CDFW Jurisdiction for the Offsite Areas

Channel Name	Non-Riparian Streambed (acres)	Riparian Habitat (acres)	Total (acres)	Length (linear feet)
Channel 1	0.01	0	0.01	75
Channel 3	0.01	0	0.01	125
Channel 6	0	0.05	0.05	75
Channel 7	0.01	0.23	0.24	425
Total	0.03	0.28	0.31	700

(GLA, 2021a, Table 4-9)

Channel 1

CDFW jurisdiction associated with Channel 1 totals 0.04 acre (0.03 acre onsite and 0.01 acre offsite), 0.03 acre (onsite) of which consists of CDFW riparian. The initial jurisdictional delineation performed by L&L in 2003 and revised in 2005 described Channel 1 as an ephemeral drainage vegetated primarily by upland species such as mustard with sporadic individuals of mulefat present, as well as scrub oaks and a coast live oak tree. The drainage originates on site and flows northeast for approximately 200 feet before entering into the Offsite impact area, where it flows for another 75 feet before exiting the Study Area. Flows originating from Channel 1 ultimately discharge off site into Temescal Canyon Wash, which is tributary to Corona Lake. The onsite



portion of the drainage averages approximately 10 feet in width, while the offsite portion averages approximately 4 feet in width. Adjacent upland areas consisted of disturbed Riversidean sage scrub vegetated with California buckwheat and white sage; disturbed areas vegetated with ruderal vegetation and non-native grasses; and scrub oak chaparral vegetated with scrub oak (*Quercus berberidifolia*), chamise, and sugar bush (*Rhus ovata*). Current conditions on site have changed since the previous studies, as vegetation removals occurred in 2007. As of the 2020 surveys performed by GLA, vegetation within Channel 1 consisted primarily of brittle bush scrub and upland mustards as described in subsection 4.4.1.C, above. (GLA, 2021a, p. 59)

Channel 2

CDFW jurisdiction associated with Channel 2 totals 0.94 acre (all onsite), 0.28 acre of which consists of CDFW riparian. The initial jurisdictional delineation performed by L&L in 2003 and revised in 2005 described Channel 2 as an intermittent drainage vegetated primarily by dense southern willow woodland with an understory of mulefat thickets. The drainage arrives on the property through a storm drain on the western boundary adjacent to residential development and flows northeast for approximately 900 feet before exiting the Study Area. Flows from Channel 2 ultimately discharge off site into Temescal Canyon Wash, which is tributary to Corona Lake. After approximately 700 feet from its entrance into the Project site, Channel 2 becomes more sparsely vegetated, though consisting of the same component habitat. Current conditions on site have changed since the previous studies, as vegetation removals occurred in 2007. As of the 2020 surveys performed by GLA, vegetation within Channel 2 consisted primarily of southern cottonwood willow riparian forest as described in subsection 4.4.1.C, above. (GLA, 2021a, p. 59)

Channel 3

CDFW jurisdiction associated with Channel 3 totals 1.20 acre (1.19 acre onsite and 0.01 acre offsite), 1.19 acre (onsite) of which consists of CDFW riparian. The initial jurisdictional delineation performed by L&L in 2003 and revised in 2005 described Channel 3 as an ephemeral drainage vegetated primarily by upland species such as mustards and bromes in the south, and by sage scrub and chamise community vegetation in the northern portions of the drainage feature. The drainage originates on site and flows northeast for approximately 2,500 feet before entering into the Offsite impact area, where it flows for another 125 feet before exiting the Study Area. Flows originating from Channel 3 ultimately discharge off site into Temescal Canyon Wash, which is tributary to Corona Lake. The onsite portion of the drainage averages approximately 5 feet in width, while the offsite portion averages approximately 4 feet in width. Adjacent upland areas consisted of disturbed areas dominated by ruderal vegetation and non-native grasses, Riversidean sage scrub dominated by California sagebrush, and scrub oak/chamise chaparral vegetated with scrub oak, chamise, California sagebrush, California bush poppy (*Dendromecon rigida*), and thick-leaved lilac (*Ceanothus crassifolius*). CDFW conditions on site have changed since the previous studies, as vegetation removals occurred in 2007. As of the 2020 surveys performed by GLA, vegetation within Channel 3 consisted primarily of brittle bush scrub and disturbed California buckwheat scrub as described in subsection 4.4.1.C, above. (GLA, 2021a, pp. 59-60)



Channel 4

CDFW jurisdiction associated with Channel 4 totals 0.24 acre (all onsite), all of which consists of CDFW riparian habitat. The initial jurisdictional delineation performed by L&L in 2003 and revised in 2005 described Channel 4 as an ephemeral drainage vegetated primarily by dense coastal sage scrub and chamise chaparral. The drainage originates on the property and flows northeast for approximately 700 feet before exiting the Study Area. Flows from Channel 4 ultimately discharge off site into Temescal Canyon Wash, which is tributary to Corona Lake. Current conditions on site have changed since the previous studies, as vegetation removals occurred in 2007. As of the 2020 surveys performed by GLA, vegetation within Channel 4 consisted primarily of disturbed California buckwheat scrub and disturbed chamise chaparral as described in subsection 4.4.1.C, above. (GLA, 2021a, p. 60)

Channel 5

CDFW jurisdiction associated with Channel 5 totals 0.75 acre (all onsite), all of which consists of CDFW riparian habitat. The initial jurisdictional delineation performed by L&L in 2003 and revised in 2005 described Channel 5 as an ephemeral drainage vegetated primarily by dense coastal sage scrub and chamise chaparral. The drainage originates on the property and flows northeast for approximately 2,200 feet before exiting the Study Area. Flows from Channel 5 ultimately discharge off site into Temescal Canyon Wash, which is tributary to Corona Lake. Current conditions on site have changed since the previous studies, as vegetation removals occurred in 2007. As of the 2020 surveys performed by GLA, vegetation within Channel 5 consisted primarily of disturbed California buckwheat scrub, disturbed chamise chaparral, and upland mustards as described in subsection 4.4.1.C, above. (GLA, 2021a, pp. 60-61)

Channel 6

CDFW jurisdiction associated with Channel 6 totals 4.69 acres (4.64 acres on site and 0.05 acre off site), 1.60 acre of which consists of CDFW riparian habitat (1.55 acres on site and 0.05 acre off site). The initial jurisdictional delineation performed by L&L in 2003 and revised in 2005 described Channel 6 as an intermittent drainage vegetated primarily by dense willows and cottonwoods in the southern portion of the channel, which then thins into unvegetated streambed. The drainage originates from a suburban runoff storm drain along the southeast boundary of the Project and flows north for approximately 3,600 feet before exiting the Study Area. Flows from Channel 6 ultimately discharge off site into Temescal Canyon Wash, which is tributary to Corona Lake. Current conditions on site have changed since the previous studies, as vegetation removals occurred in 2007. As of the 2020 surveys performed by GLA, vegetation within Channel 6 has expanded further north than previously described. The southern cottonwood willow riparian forest present in Channel 6 during the 2020 surveys is described subsection 4.4.1.C, above. (GLA, 2021a, p. 61)

Channel 7

CDFW jurisdiction associated with Channel 7 totals 0.24 acre (all offsite), 0.23 acre of which consists of CDFW riparian habitat. The initial jurisdictional delineation for Channel 7 performed by GLA in 2006 described Channel 7 as an ephemeral drainage vegetated primarily by arroyo willow, mulefat, and stinging nettle (*Urtica dioica*), as well as more sporadic areas of mulefat that support tree tobacco, castor bean, and salt



cedar. The drainage originates at a culvert outlet in the southwest corner of the Offsite impact area, and then extends approximately 425 linear feet north/northeast within the Offsite impacts area, at which point the channel then extends into the Interstate 15 right-of-way and enters a culvert pipe that conveys flows underneath the freeway and towards the Temescal Canyon Wash. Current conditions on site have remained relatively consistent with the previous studies. (GLA, 2021a, p. 61)

L. MSHCP Riparian/Riverine Areas and Vernal Pools

Vegetation communities associated with riparian systems and vernal pools are depleted natural vegetation communities because, similar to coastal sage scrub, they have declined throughout Southern California during past decades. In addition, they support a large variety of special-status wildlife species. Most species associated with riparian/riverine are covered species under the MSHCP (under Section 6.1.2). The MSHCP has specific policies and procedures regarding the evaluation and conservation of riparian/riverine resources (including riparian vegetation) and vernal pools because they support MSHCP-covered species. Specifically, the MSHCP defines riparian/riverine areas as lands which contain habitat dominated by trees, shrubs, persistent emergent mosses, and lichens, which occur close to or which depend upon soils moisture from a nearby fresh water source; or areas with fresh water flow during all or a portion of the year. Thus, the MSHCP classification of riparian/riverine includes both riparian (depleted natural vegetation communities) as well as ephemeral drainages that are natural in origin but may lack riparian vegetation. (GLA, 2021a, pp. 61-62)

The Study Area contains 8.10 acres of MSHCP riparian/riverine areas, including 4.32 acres of riparian areas and 3.78 acres of unvegetated riverine. Of this total, 7.79 acres are located onsite and 0.31 acres are located within offsite improvement areas. These acreages derived from GLA's interpretation or the Project's jurisdictional delineation report prepared by L&L dated May 2005, as well as the existing approved regulatory permits issued by the Corps, Regional Board, and CDFW for the Project. (GLA, 2021a, p. 62)

While GLA conducted updated vegetation mapping for the Study Area, an updated jurisdictional delineation was not performed. Instead, GLA relied on L&L for jurisdictional acreages and associated riparian habitat numbers (refer to Appendix C to the Project's BTR, included as *Technical Appendix CI* to this EIR). The numbers in L&L's jurisdictional delineation were approved through a submitted Determination of Biological Equivalent or Superior Preservation (DBESP). GLA did update riparian vegetation mapping during 2020 general biological surveys. GLA riparian vegetation numbers do not equate to MSHCP Riparian/Riverine numbers and are not delineated as such. (GLA, 2021a, p. 62)

The Project site does not contain vernal pools and does not contain other seasonal pools, including natural depressions and human created depressions such as stock ponds and tire ruts. As discussed above, no ponding was observed at the site during biological surveys, including those that occurred following periods of substantial rainfall. The site lacks the suitable topography (including localized depressions) to support prolonged inundation necessary to support fairy shrimp. The site slopes from north to south and as a result of the sloping topography and drainage, there is no opportunity for water to pond at the site. In addition, the site is mapped as containing sandy loam soils, loamy sand soils, and terrace escarpments, which are generally not associated with vernal pools. Observations of the soils at the site showed a lack of clay soil components. Lastly,



no plants were observed at the site that are associated with vernal pools and similar habitats that experience prolonged inundation. (GLA, 2021a, p. 62)

4.4.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations governing the protection of biological resources.

A. Federal Regulations

1. Endangered Species Act (ESA)

The purpose of the federal Endangered Species Act (ESA) is to protect and recover imperiled species and the ecosystems upon which they depend. It is administered by the U.S. Fish and Wildlife Service (USFWS) and the Commerce Department's National Marine Fisheries Service (NMFS). The USFWS has primary responsibility for terrestrial and freshwater organisms, while the responsibilities of NMFS are mainly marine wildlife such as whales and anadromous fish such as salmon. Under the ESA, species may be listed as either endangered or threatened. "Endangered" means a species is in danger of extinction throughout all or a significant portion of its range. "Threatened" means a species is likely to become endangered within the foreseeable future. All species of plants and animals, except pest insects, are eligible for listing as endangered or threatened. (USFWS, 2017)

The ESA makes it unlawful for a person to take a listed animal without a permit. Take is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct." Through regulations, the term "harm" is defined as "an act which actually kills or injures wildlife. Such an act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering." Listed plants are not protected from take, although it is illegal to collect or maliciously harm them on federal land. Protection from commercial trade and the effects of federal actions do apply for plants. (USFWS, 2017)

Section 7 of the ESA requires federal agencies to use their legal authorities to promote the conservation purposes of the ESA and to consult with the USFWS and NMFS, as appropriate, to ensure that effects of actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of listed species. During consultation, the "action" agency receives a "biological opinion" or concurrence letter addressing the proposed action. In the relatively few cases in which the USFWS or NMFS makes a jeopardy determination, the agency offers "reasonable and prudent alternatives" about how the proposed action could be modified to avoid jeopardy. It is extremely rare that a project ends up being withdrawn or terminated because of jeopardy to a listed species. (USFWS, 2017)

Section 10 of the ESA may be used by landowners including private citizens, corporations, tribes, states, and counties who want to develop property inhabited by listed species. Landowners may receive a permit to take such species incidental to otherwise legal activities, provided they have developed an approved habitat conservation plan (HCP). HCPs include an assessment of the likely impacts on the species from the proposed



action, the steps that the permit holder will take to avoid, minimize, and mitigate the impacts, and the funding available to carry out the steps. HCPs may benefit not only landowners but also species by securing and managing important habitat and by addressing economic development with a focus on species conservation. (USFWS, 2017)

2. Clean Water Act Section 401

Clean Water Act (CWA) § 401 water quality certification provides states and authorized tribes with an effective tool to help protect water quality, by providing them an opportunity to address the aquatic resource impacts of federally issued permits and licenses. Under § 401, a federal agency cannot issue a permit or license for an activity that may result in a discharge to waters of the U.S. until the state or tribe where the discharge would originate has granted or waived § 401 certification. The central feature of CWA § 401 is the state or tribe's ability to grant, grant with conditions, deny, or waive certification. Granting certification, with or without conditions, allows the federal permit or license to be issued consistent with any conditions of the certification. Denying certification prohibits the federal permit or license from being issued. Waiver allows the permit or license to be issued without state or tribal comment. States and tribes make their decisions to deny, certify, or condition permits or licenses based in part on the proposed project's compliance with Environmental Protection Agency (EPA)-approved water quality standards. In addition, states and tribes consider whether the activity leading to the discharge will comply with any applicable effluent limitations guidelines, new source performance standards, toxic pollutant restrictions, and other appropriate requirements of state or tribal law. (EPA, n.d.)

Many states and tribes rely on § 401 certification to ensure that discharges of dredge or fill material into a water of the U.S. do not cause unacceptable environmental impacts and, more generally, as their primary regulatory tool for protecting wetlands and other aquatic resources. However, § 401 is limited in scope and application to situations involving federally-permitted or licensed activities that may result in a discharge to a water of the U.S. If a federal permit or license is not required, or would authorize impacts only to waters that are not waters of the U.S., the activity is not subject to the CWA § 401. (EPA, n.d.)

3. Clean Water Act Section 404

Section 404 of the CWA establishes a program to regulate the discharge of dredged or fill material into waters of the United States, including wetlands. Wetlands subject to Clean Water Act Section 404 are defined as "areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." Activities in waters of the United States regulated under this program include fill for development, water resource projects (such as dams and levees), infrastructure development (such as highways and airports) and mining projects. Section 404 requires a permit before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from Section 404 regulation (e.g. certain farming and forestry activities). (EPA, n.d.)



The basic premise of the program is that no discharge of dredged or fill material may be permitted if: (1) a practicable alternative exists that is less damaging to the aquatic environment; or (2) the nation's waters would be significantly degraded. Applications for permits must, to the extent practicable: (1) demonstrate steps have been taken to avoid wetland impacts; (2) demonstrate that potential impacts on wetlands have been minimized; and (3) provide compensation for any remaining unavoidable impacts. Proposed activities are regulated through a permit review process. (EPA, n.d.)

An individual permit is required for potentially significant impacts. Individual permits are reviewed by the U.S. Army Corps of Engineers (ACOE), which evaluates applications under a public interest review, as well as the environmental criteria set forth in the CWA Section 404(b)(1) Guidelines. However, for most discharges that will have only minimal adverse effects, a general permit may be suitable. General permits are issued on a nationwide, regional, or State basis for particular categories of activities. The general permit process eliminates individual review and allows certain activities to proceed with little or no delay, provided that the general or specific conditions for the general permit are met. States also have a role in Section 404 decisions, through state program general permits, water quality certification, or program assumption. (EPA, n.d.)

4. *Executive Order 11990 – Protection of Wetlands*

The purpose of Executive Order (EO) 11990 is to "minimize the destruction, loss or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands." To meet these objectives, the Order requires federal agencies, in planning their actions, to consider alternatives to wetland sites and limit potential damage if an activity affecting a wetland cannot be avoided. (FEMA, n.d.) The Order applies to:

- Acquisition, management, and disposition of federal lands and facilities construction and improvement projects which are undertaken, financed, or assisted by federal agencies;
- Federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulation, and licensing activities. (FEMA, n.d.)

The procedures require the determination of whether or not the proposed project will be in or will affect wetlands. If so, a wetlands assessment must be prepared that describes the alternatives considered. The procedures include a requirement for public review of assessments. (FEMA, n.d.)

5. *Migratory Bird Treaty Act (16 USC Section 703-712)*

The Migratory Bird Treaty Act (MBTA) makes it illegal for anyone to take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. The migratory bird species protected by the MBTA are listed in 50 CFR 10.13. The USFWS has statutory authority and responsibility for enforcing the MBTA (16 U.S.C. 703-712). The MBTA implements Conventions between the United States and four countries (Canada, Mexico, Japan, and Russia) for the protection of migratory birds. (USFWS, 2020)



B. State Regulations

1. California Endangered Species Act (CESA)

The California Endangered Species Act (CESA) states that all native species of fishes, amphibians, reptiles, birds, mammals, invertebrates, and plants, and their habitats, threatened with extinction and those experiencing a significant decline which, if not halted, would lead to a threatened or endangered designation, will be protected or preserved. The California Department of Fish and Wildlife (CDFW) works with interested persons, agencies, and organizations to protect and preserve such sensitive resources and their habitats. CESA prohibits the take of any species of wildlife designated by the California Fish and Game Commission as endangered, threatened, or candidate species. CDFW may authorize the take of any such species if certain conditions are met. (CDFW, n.d.)

Section 2081 subdivision (b) of the California Fish and Game Code (CFGC) allows CDFW to authorize take of species listed as endangered, threatened, candidate, or a rare plant, if that take is incidental to otherwise lawful activities and if certain conditions are met. These authorizations are commonly referred to as incidental take permits (ITPs). (CDFW, n.d.)

If a species is listed by both the federal ESA and CESA, CFGC Section 2080.1 allows an applicant who has obtained a federal incidental take statement (federal Section 7 consultation) or a federal incidental take permit (federal Section 10(a)(1)(B)) to request that the Director of CDFW find the federal documents consistent with CESA. If the federal documents are found to be consistent with CESA, a consistency determination (CD) is issued and no further authorization or approval is necessary under CESA. (CDFW, n.d.)

A Safe Harbor Agreement (SHA) authorizes incidental take of a species listed as endangered, threatened, candidate, or a rare plant, if implementation of the agreement is reasonably expected to provide a net conservation benefit to the species, among other provisions. SHAs are intended to encourage landowners to voluntarily manage their lands to benefit CESA-listed species. California SHAs are analogous to the federal safe harbor agreement program and CDFW has the authority to issue a consistency determination based on a federal safe harbor agreement. (CDFW, n.d.)

2. Natural Community Conservation Planning Act (NCCP)

CDFW's Natural Community Conservation Planning (NCCP) program takes a broad-based ecosystem approach to planning for the protection and perpetuation of biological diversity. The NCCP program began in 1991 as a cooperative effort to protect habitats and species. It is broader in its orientation and objectives than the California and Federal Endangered Species Acts, as these laws are designed to identify and protect individual species that have already declined in number significantly. (CDFW, n.d.)

An NCCP identifies and provides for the regional protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity. Working with landowners, environmental organizations, and other interested parties, a local agency oversees the numerous activities that compose the



development of an NCCP. CDFW and the U.S. Fish and Wildlife Service provide the necessary support, direction, and guidance to NCCP participants. (CDFW, n.d.)

There are currently 13 approved NCCPs (includes 6 subarea plans) and 22 NCCPs in the active planning phase (includes 10 subarea plans), which together cover more than 7 million acres and will provide conservation for nearly 400 special status species and a wide diversity of natural community types throughout California. (CDFW, n.d.)

3. *California Fish and Game Code, Section 1600, et seq.*

CFGF section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: (1) substantially divert or obstruct the natural flow of any river, stream, or lake; (2) substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or (3) deposit debris, waste or other materials that could pass into any river, stream, or lake. The CFGF indicates that "any river, stream or lake" includes those that are episodic (they are dry for periods of time) as well as those that are perennial (they flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. (CDFW, n.d.)

CDFW requires a Lake and Streambed Alteration (LSA) Agreement when it determines that the activity, as described in a complete LSA Notification, may substantially adversely affect existing fish or wildlife resources. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify a project that would eliminate or reduce harmful impacts to fish and wildlife resources. Before issuing an LSA Agreement, CDFW must comply with CEQA. (CDFW, n.d.)

4. *Native Plant Protection Act (NPPA) of 1977*

The Native Plant Protection Act (NPPA) was enacted in 1977 and allows the Fish and Game Commission to designate plants as rare or endangered. There are 64 species, subspecies, and varieties of plants that are protected as rare under the NPPA. The NPPA prohibits take of endangered or rare native plants, but includes some exceptions for agricultural and nursery operations; emergencies; and after properly notifying CDFW for vegetation removal from canals, roads, and other sites, changes in land use, and in certain other situations. (CDFW, n.d.)

5. *Oak Woodlands Conservation Program*

The Oak Woodlands Conservation Program offers landowners, conservation organizations, cities and counties an opportunity to obtain funding for projects designed to conserve and restore California's oak woodlands. While the Program is statewide in nature, it provides opportunities to address oak woodland issues on a regional priority basis. The Program is designed to help local efforts achieve oak woodland protection, and provides a mechanism to achieve sustainable ranch and farming operations and healthy oak woodlands. (WCB, n.d.)



6. *Unlawful Take or Destruction of Nests or Eggs (CFGC Sections 3503.5-3513)*

Section 3503.5 of the CFGC specifically protects birds of prey, stating: “It is unlawful to take, possess, or destroy any . . . [birds-of-prey] or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.” Section 3513 of the CFGC duplicates the federal protection of migratory birds, stating: “It is unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act.” (CA Legislative Info, n.d.)

7. *Porter-Cologne Water Quality Act*

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code section 13000 et seq.), the policy of the State is as follows:

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation. (SWRCB, 2014)

The Porter-Cologne Act established nine Regional Water Boards (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and Regional Water Boards have numerous Non-Point Source (NPS)-related responsibilities, including monitoring and assessment, planning, financial assistance, and management. (SWRCB, 2014)

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of National Pollutant Discharge Elimination System (NPDES) permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The SWRCB and the RWQCBs can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions. (SWRCB, 2014)



The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. A number of statewide water quality control plans have been adopted by the State Water Board. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. Statewide and regional water quality control plans include enforceable prohibitions against certain types of discharges, including those that may pertain to nonpoint sources. Portions of water quality control plans, the water quality objectives and beneficial use designations, are subject to review by the EPA, when approved they become water quality standards under the CWA. (SWRCB, 2014)

C. Local and Regional Plans and Regulations

1. Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)

The continued loss of habitat to new development and the cumbersome process of environmental review and habitat mitigation on a project-by-project basis led to preparation of the MSHCP. The MSHCP is a multi-jurisdictional accomplishment that provides a regional conservation solution to species and habitat issues. The primary intent of the MSHCP is to provide for the conservation of a range of plants and animals within natural communities characteristic of western Riverside County and in return, provide take coverage and mitigation for projects throughout the plan area to avoid the cost and delays of mitigating biological impacts on a project-by-project basis. (Riverside County, 2015, p. 4.8-49)

The MSHCP was adopted by Riverside County on June 17, 2003, and is a comprehensive, multijurisdictional Habitat Conservation Plan (HCP) pursuant to Section 10(a)(1)(B) of FESA, as well as an NCCP pursuant to the California Fish and Game Code. The USFWS issued a Biological Opinion and Federal ESA Section 10 permit for the MSHCP on June 22, 2004, and CDFW issued a Natural Community Conservation Planning (NCCP) Approval and Take Authorization on the same date. As long as adherence to the policies and requirements of the MSHCP is maintained, participants in the MSHCP, which include the County of Riverside and 18 cities, are allowed to authorize ‘incidental take’ of covered plant and wildlife species. (Riverside County, 2015, p. 4.8-49)

The MSHCP provides for the long-term survival of protected and sensitive species by designating a contiguous system of habitat to be added to existing public/quasi-public lands. The Plan includes an impact fee collected by the permittees and used in part to acquire these lands. Depending on the location of the private or public development project, certain biological studies are required for Plan compliance. These studies may identify the need for specific measures to avoid, minimize and reduce impacts to covered species and their habitat. (Riverside County, 2015, pp. 4.8-49 and 4.8-50)

The MSHCP defines two distinct consistency processes for development projects based on their location within the MSHCP’s coverage area, with separate processes for projects located outside of Criteria Areas and those within a Criteria Area. Criteria Areas consist of 160-acre ‘cells’ with identified conservation objectives. (Riverside County, 2015, p. 4.8-50)



2. *Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP)*

The Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) was prepared under the direction of the Riverside County Habitat Conservation Agency (RCHCA) Board of Directors, in consultation with USFWS and CDFW. The County of Riverside is a member agency of the RCHCA. The 30-year SKR HCP was designed to acquire and permanently conserve, maintain, and fund the conservation, preservation, restoration, and enhancement of Stephens' kangaroo rat-occupied habitat. The SKR HCP covers approximately 534,000 acres within the member jurisdictions and includes an estimated 30,000 acres of occupied Stephens' kangaroo rat habitat. The SKR HCP requires members to preserve and manage 15,000 acres of occupied habitat in seven Core Reserves encompassing over 41,000 acres. (Riverside County, 2015, p. 4.8-52)

On May 3, 1996, the USFWS issued a permit to the Riverside County Habitat Conservation Agency to incidentally take the federally endangered Stephens' kangaroo rat (*Dipodomys stephensi*). Similarly, the CDFW issued a California Endangered Species Act Management Authorization for Implementation of the Stephens' kangaroo rat on May 6, 1996. As of 2015, more than \$50 million had been dedicated to the establishment and management of a system of regional preserves designed to ensure the survival of SKR in the plan area. This effort resulted in the permanent conservation of approximately 50% of the SKR-occupied habitat remaining in the HCP area. Through direct funding and in-kind contributions, SKR habitat in the regional reserve system is managed to ensure its continuing ability to support the species. Core reserves were deemed complete in December of 2003. (Riverside County, 2015, p. 4.8-52)

3. *Riverside County Oak Tree Management Guidelines*

In March 1993, the County of Riverside issued Oak Tree Management Guidelines to address the treatment of oak woodlands in areas where zoning and/or General Plan density restrictions allow the effective use of clustering. The guidelines are generally considered to be the most effective where minimum lot sizes are 2.5 acres or larger, or where oak woodlands are concentrated in a relatively small portion of a project site. The guidelines include recommendations for oak inventories, land use designs to cluster home sites in order to reduce impacts to oaks and mitigation measures for oak conservation. (Riverside County, 2015, p. 4.8-53)

4. *Riverside County Ordinance No. 559 – Regulating the Removal of Trees*

Riverside County Ordinance No. 559 regulates the removal of living native trees on parcels of property greater than one-half acre, located above 5,000 feet within the unincorporated area of Riverside County without first obtaining a permit to do so. The purpose of the ordinance is to ensure that the timberlands of Riverside County are protected and the ecological balance of such timberlands is preserved. (Riverside County, 2015, p. 4.8-53)

4.4.3 BASIS FOR DETERMINING SIGNIFICANCE

Section IV of Appendix G to the State CEQA Guidelines addresses typical adverse effects to biological resources, and includes the following threshold questions to evaluate the Project's impacts to biological resources (OPR, 2018a):



- *Would the Project 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 Game or U.S. Fish and Wildlife Service?*
- *Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?*
- *Would the Project 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?*
- *Would the Project 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?*
- *Would the Project Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*
- *Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section IV of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact on biological resources if construction and/or operation of the Project would:

- *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan;*
- *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);*
- *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;*
- *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;*
- *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;*



- *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; or*
- *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.*

The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist were used to evaluate the significance of the proposed Project’s impacts to biological resources.

4.4.4 IMPACT ANALYSIS

Threshold a: *Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?*

The Project area is subject to two separate habitat conservation plans: the Stephens’ Kangaroo Rat HCP and the Western Riverside County MSHCP. Each is discussed below.

A. Project Consistency with the SKR HCP

As previously noted, the SKR HCP was prepared under the direction of the RCHCA Board of Directors, in consultation with USFWS and CDFW. Riverside County is a member agency of the RCHCA. According to Figure S-1 of the SKR HCP, the Project site is not located within or adjacent to any SKR core reserve areas. Additionally, the Project Applicant would be required to contribute fees towards the establishment and long-term maintenance of the SKR HCP core reserve pursuant to Riverside County Ordinance No. 663. The Project would not conflict with any provisions of the SKR HCP; thus, a less-than-significant impact would occur.

B. Project Consistency with the MSHCP

Provided below is an evaluation of the Project’s consistency with MSHCP Reserve assembly requirements, Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface), and Section 6.3.2 (Additional Survey Needs and Procedures). (GLA, 2021a, p. 77)

1. Project Relationship to MSHCP Reserve Assembly

The Project is located within the Estelle Mountain/Indian Canyon Area Plan Subunit of the MSHCP and is located within the MSHCP Criteria Cells 3647, 3648, and 3748, as previously depicted on EIR Figure 2-6. A small portion of the Project is located within the MSHCP Core and Linkage areas. Specifically, the Project is located within Cell Groups E and F of the MSHCP. As such, part of the proposed Project was identified by the MSHCP for reserve assembly and is subject to the Habitat Acquisition Negotiation Strategy (HANS) process or the Joint Project Review (JPR) process. (GLA, 2021a, p. 77)



A HANS application was submitted which was approved in November 2003. Within Cell Groups E and F, targeted areas for conservation include approximately 40% to 50% of Cell Group E focusing on the northern portion and 65% to 75% of Cell Group F within the northern portion. The HANS letter identified approximately 27.1 acres on the eastern portion of the Study Area which would be required for onsite conservation for compliance with the MSHCP conservation assembly goals. These areas were incorporated into Project planning and are proposed as open-space conservation areas within proposed Planning Areas 5 and 6 of the Renaissance Ranch Commerce Center Specific Plan (SP 333A1). As such, the Project would not conflict with the MSHCP Reserve Assembly requirements, and Project impacts would be less than significant. (GLA, 2021a, pp. 77-78)

2. *Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools*

Volume I, Section 6.1.2 of the MSHCP establishes procedures through which the protection of Riparian/Riverine Areas and Vernal Pools would occur within the MSHCP area. The purpose of the procedure is to ensure that the biological functions and values of these habitat areas throughout the MSHCP area are maintained such that habitat values for species inside the MSHCP Conservation Area are maintained. (GLA, 2021a, p. 78)

The proposed Project would permanently impact 4.93 acres of riverine resources, 3.98 acres of which is associated with riparian vegetation. A DBESP previously was prepared to ensure that compensation for the removal of 4.95 acres of riparian/riverine resources (4.00 acres of riparian resources are included) would occur in the form of replacement at a 1:1 ratio, after which, the proposed Project would be consistent with Volume I, Section 6.1.2 of the MSHCP. Although language in the DBESP did not specifically address MSHCP Riverine areas, unvegetated CDFW jurisdictional areas are synonymous with MSHCP Riverine areas. Impacts to MSHCP Riverine and MSHCP Riparian areas have already been mitigated through the purchase of 24.20 acres of offsite mitigation credits through the Regional Conservation Authority (RCA). As such, the mitigation for these areas is considered biologically superior, and is consistent with Volume I, Section 6.1.2 of the MSHCP. (GLA, 2021a, p. 78)

Additionally, a 0.05-acre riparian impact area south of the Project near Bolo Court must occur due to storm drain improvements. Impacts to this 0.05-acre of riparian habitat was not accounted for in the previously-approved DBESP. As such, in the absence of a site-specific DBESP for off-site impacts to 0.05-acre of riparian habitat and associated mitigation, the Project has the potential to conflict with Volume I, Section 6.1.2 of the MSHCP. This is evaluated as a significant impact for which mitigation would be required. (GLA, 2021a, p. 78)

The Project site supports potential habitat for riparian-associated birds including least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo; however, none of these species were detected within the Project site during general or focused surveys. As focused surveys for species with the potential to occur on site (least Bell's vireo) were performed in 2020, the proposed Project is consistent with Volume I, Section 6.1.2 of the MSHCP. (GLA, 2021a, p. 78)



Additionally, no vernal pools or seasonal pools/depressions are present within the Project site (GLA, 2021a, p. 78).

Based on the foregoing analysis, the Project has the potential to conflict with Volume I, Section 6.1.2 of the MSHCP in the absence of a DBESP and associated mitigation for impacts to 0.05 acre of riparian habitat. This is evaluated as a potentially significant impact for which mitigation would be required.

3. *Protection of Narrow Endemic Plants*

Volume I, Section 6.1.3 of the MSHCP requires that within identified MSHCP Narrow Endemic Plant Species Survey Area (NEPSSA), site-specific focused surveys for Narrow Endemic Plants Species will be required for all public and private projects where appropriate soils and habitat are present. The proposed Project does occur within the NEPSSA. As such, appropriate habitat assessments for targeted NEPSSA species were conducted for thread-leaved brodiaea, Davidson's saltscale, Parish's brittle scale, smooth tarplant, round-leaved filaree, Coulter's goldfields, little mousetail, Munz's onion, San Diego ambrosia, slender-horned spineflower, many-stemmed dudleya, spreading navarretia, California Orcutt grass, San Miguel savory, Hammitt's clay-cress, and Wright's trichocoronis. Habitat on the Project site was deemed unsuitable for these species; additionally, none of these species were detected during focused surveys in 2020. As such, the proposed Project would not impact narrow endemic plants, and the Project would be consistent with Volume I, Section 6.1.3 of the MSHCP. (GLA, 2021a, pp. 78-79)

4. *Guidelines Pertaining to the Urban/Wildland Interface*

The MSHCP Urban/Wildland Interface Guidelines are intended to address indirect effects associated with locating development in proximity to the MSHCP Conservation Area. As the MSHCP Conservation Area is assembled, development is expected to occur adjacent to the Conservation Area. Future development in proximity to the MSHCP Conservation Area may result in edge effects with the potential to adversely affect biological resources within the Conservation Area. To minimize such edge effects, the guidelines shall be implemented in conjunction with review of individual public and private development projects in proximity to the MSHCP Conservation Area and address the following: (GLA, 2021a, p. 79)

- Drainage;
- Toxics;
- Lighting;
- Noise;
- Invasive species;
- Barriers; and
- Grading/Land Development.

An Evaluation of Urban-Wildland Interface was performed in January 2004 by L&L Environmental which details suggested methods of addressing potential edge impacts associated with the Project. As more fully discussed below, the proposed Project has the potential to conflict with provisions included within Section



6.1.4 of the MSHCP. This is evaluated as a significant impact for which mitigation would be required. (GLA, 2021a, p. 79)

Drainage

Proposed Projects in proximity to the MSHCP Conservation Area are required to incorporate measures, including measures required through the NPDES requirements, to ensure that the quantity and quality of runoff discharged to the MSHCP Conservation Area is not altered in an adverse way when compared with existing conditions. In particular, measures are required to be put in place to avoid discharge of untreated surface runoff from developed and paved areas into the MSHCP Conservation Area. Stormwater systems are required to be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials or other elements that might degrade or harm biological resources or ecosystem processes within the MSHCP Conservation Area. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. Regular maintenance is required to ensure effective operations of runoff control systems. (GLA, 2021a, p. 72)

The Project's construction contractor would be required to develop a Stormwater Pollution Prevention Plan (SWPPP) to address potential runoff and water quality effects during construction. Following the completion of activities, and pursuant to the Project's Water Quality Management Plan ("WQMP"; EIR *Technical Appendix H2*) the Project's drainage system would provide detention and water quality treatment to ensure runoff from the site does not result in increased drainage to the Santa Ana River, or affect the water quality of the river. Mandatory compliance with the future-required SWPPP during construction and the Project's WQMP under long-term operations would ensure that the Project does not conflict with the MSHCP provisions related to indirect drainage impacts. Accordingly, impacts would be less than significant. (GLA, 2021a, p. 71)

Toxics

Land uses proposed in proximity to the MSHCP Conservation Area that use chemicals or generate bioproducts such as manure that are potentially toxic or may adversely affect wildlife species, habitat, or water quality are required to incorporate measures to ensure that application of such chemicals does not result in discharge to the MSHCP Conservation Area. As noted above, near-term construction activities would be subject to compliance with a SWPPP and long-term operations would be subject to compliance with the Project's WQMP, both of which would preclude the discharge of toxics from the Project site that could adversely affect the MSHCP Conservation Area. As such, the Project would not conflict with the MSHCP provisions related to toxics, and impacts would be less than significant. (GLA, 2021a, p. 72)

Lighting

Night lighting has the potential to adversely affect sensitive wildlife species if lighting elements are not directed away from the MSHCP Conservation Area. Night lighting is required to be directed away from the MSHCP Conservation Area to protect species within the MSHCP Conservation Area from direct night lighting. If night



lighting is required during construction, shielding shall be incorporated to ensure ambient lighting in the MSHCP Conservation Area is not increased. (GLA, 2021a, p. 73)

There is a potential that future implementing developments within the Project may require nighttime lighting during construction activities, particularly during night-time concrete pouring activities. Thus, during Project construction activities the Project has the potential to conflict with the lighting provisions of the MSHCP, resulting in a near-term significant impact.

Under long-term operating conditions, future development on site would be subject to compliance with Riverside County Ordinance No. 655 (Mt. Palomar Observatory), Riverside County Ordinance No. 915 (Regulating Outdoor Lighting), and the lighting requirements of the proposed Renaissance Ranch Commerce Center Specific Plan (SP 333A1). In particular, Section 5 of Riverside County Ordinance No. 915 requires that “[a]ll outdoor luminaires in shall be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way.” Riverside County would review future implementing projects (i.e., plot plans, building permits, etc.) to ensure compliance with Riverside County Ordinance Nos. 655 and 915 and the lighting provisions of the proposed SP 333A1, which would ensure that long-term operational lighting does not adversely affect the MSHCP Conservation Area. As such, under long-term conditions the Project would not conflict with the lighting provisions of the MSHCP, and impacts would be less than significant.

Noise

Noise has the potential to adversely affect sensitive wildlife species within the MSHCP Conservation Area. Proposed noise generating land uses affecting the MSHCP Conservation Area are required to incorporate setbacks, berms, or walls to minimize the effects of noise on MSHCP Conservation Area resources pursuant to applicable rules, regulations, and guidelines related to land use noise standards. For planning purposes, wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed residential noise standards (i.e., 65 dBA CNEL). The currently-proposed Project consists of planning-level approvals, and no site-specific development plans are available. Site-specific development plans would be identified in the future in association with implementing developments. Accordingly, any analysis of potential indirect noise impacts affecting the MSHCP would be speculative. Notwithstanding, and to provide a conservative assessment of Project impacts, it is conservatively assumed that long-term operation of the Project would have the potential to expose the MSHCP Conservation Area to noise levels exceeding residential noise standards. This is evaluated as a significant impact for which mitigation would be required. (GLA, 2021a, p. 73)

Invasive Species

Projects adjacent to the MSHCP Conservation Area are required to avoid the use of invasive plant species in landscaping, including invasive, non-native plant species listed in Volume I, Table 6-2 of the MSHCP. Future development on site would be subject to compliance with the proposed Renaissance Ranch Commerce Center Specific Plan (SP 333A1). Table 4-1 of SP 333A1 includes a plant palette, which does not contain any species included on the list of prohibited plant species pursuant to MSHCP Volume I, Table 6-2. Riverside County would review future implementing developments (i.e., plot plans, building permits, etc.) to ensure compliance



with all applicable provisions of proposed SP 333A1, thereby ensuring that future landscaping on site does not include any of the prohibited plant species listed in Volume I, Table 6-2 of the MSHCP. Accordingly, indirect impacts due to invasive species would be less than significant. (GLA, 2021a, p. 73)

Barriers

Proposed land uses adjacent to the MSHCP Conservation Area are required to incorporate barriers, where appropriate in individual project designs to minimize unauthorized public access, domestic animal predation, illegal trespass or dumping in the MSHCP Conservation Area. Such barriers may include native landscaping, rocks/boulders, fencing, walls, signage and/or other appropriate mechanisms. Proposed SP 333A1 includes a conceptual wall and fence plan, which requires the installation of 6- to 8-foot-tall steel rod fencing and/or maintaining the existing Caltrans chain link fence along proposed Planning Areas 5 and 6, which encompass the areas to be dedicated to the MSHCP Conservation Area as part of the Project. Riverside County would review future implementing developments (i.e., plot plans, building permits, etc.) to ensure compliance with all applicable provisions of proposed SP 333A1, including the requirement to provide fencing along the MSHCP Conservation Area. As such, the Project would not conflict with the MSHCPPC requirements related to barriers, and impacts would be less than significant. (GLA, 2021a, p. 73)

Grading/Land Development

The MSHCP states that manufactured slopes associated with development shall not extend into the MSHCP Conservation Area. Proposed SP 333A1 includes a conceptual grading plan, which was previously depicted on EIR Figure 3-10. As shown on Figure 3-10, no grading is proposed within areas proposed to be conserved as natural open space, including areas that are proposed to be added to the MSHCP Conservation Area. Riverside County would review future implementing developments (e.g., plot plans, building permits) to ensure compliance with all applicable provisions of proposed SP 333A1, including compliance with the SP 333A1 conceptual grading plan. As such, the Project would not conflict with the MSHCP requirements related to grading and land development, and impacts would be less than significant. (GLA, 2021a, p. 73)

5. *Additional Survey Needs and Procedures*

Volume I, Section 6.3.2 of the MSHCP identifies that in addition to the Narrow Endemic Plant Species addressed in Section 6.1.3 of the MSHCP, additional surveys may be needed for other certain plant and animal species in conjunction with MSHCP implementation in order to achieve full coverage for these species. Within areas of suitable habitat, focused surveys are required if a Study Area occurs within a designated Criteria Area Plant Species Survey Area (CAPSSA), or special animal species survey area (i.e., burrowing owl, amphibians, and mammals). The proposed Project occurs within CAPSSA and the burrowing owl survey area but does not occur within the amphibian or mammal survey areas. Focused plant surveys were conducted for the proposed project, and no CAPSSA plant species were detected. Focused burrowing owl surveys were conducted for the proposed Project, and no burrowing owls were detected. As such, the Project would not conflict with MSHCP requirements related to NEPSSA and CAPSSA species, and impacts would be less than significant. (GLA, 2021a, p. 79)



As noted above, MSHCP Objective 6 for burrowing owls requires pre-construction surveys prior to site grading. Although focused surveys conducted for the proposed Project determined that the burrowing owl is absent from the Study Area, there is nonetheless a potential for the site to become occupied with burrowing owls prior to construction activities. This is evaluated as a potentially significant impact for which mitigation, in the form of pre-construction burrowing owl surveys, would be required. (GLA, 2021a, pp. 79-80)

Threshold b: *Would the Project 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)?*

Threshold c: *Would the Project 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?*

The following discussion examines the potential impacts to plant and wildlife resources that would occur as a result of the proposed Project.

A. Impacts to Special-Status Plants

The proposed Project would impact one special-status plant species, the Coulter’s matilija poppy. Two populations of approximately 100 individuals were detected on site; as the Coulter’s matilija poppy is a List 4 species (indicating this species is on a watch list and is of limited distribution), and due to the limited impact the Project would have on the population on a regional scale, impacts to these small populations would be considered less than significant. Additionally, the Coulter’s matilija poppy is a covered species under the MSHCP without additional survey or conservation requirements. Impacts to this species are considered less than significant. (GLA, 2021a, p. 65)

B. Impacts to Special-Status Animals

1. Impacts to Listed Species

The proposed Project would result in the loss of habitat for the coastal California gnatcatcher, which was detected on site during 2020 surveys, and had been previously detected in 2006. The proposed Project may result in the loss of habitat for Quino checkerspot butterfly and SKR. Although not confirmed present, Quino checkerspot butterfly and SKR have the potential to occur at the Project site. Impacts to each are discussed below. (GLA, 2021a, p. 65)

- **Coastal California Gnatcatcher (CAGN).** Development of the proposed Project would remove 64.61 acres of habitat (brittle bush scrub, disturbed chamise chaparral, disturbed California buckwheat scrub) for the CAGN. This species is listed as a federally Threatened, therefore, the removal of this amount of habitat would be a significant impact under CEQA. Since the CAGN is a MSHCP Covered Species, the loss of habitat for CAGN would be mitigated through compliance with the MSHCP and payment



of MSHCP development fees. However, the MSHCP does impose restrictions on clearing of occupied habitat during the nesting season. Condition 5b of the MSHCP Federal Fish and Wildlife take permit states that the “clearing of occupied habitat within [Public/Quasi-Public (PQP)] lands and the Criteria Area between March 1 and August 15 is prohibited.” Although the take of gnatcatchers is covered under the MSHCP, the purpose of this condition is to allow for the successful reproduction of gnatcatchers during the nesting season and to prevent the take of active nests. As such, the Project has the potential to result in a significant impact to the CAGN if construction activities were to occur during the nesting season. (GLA, 2021a, pp. 65, 75)

- **Quino Checkerspot Butterfly.** Development of the proposed Project would remove 19.48 acres of potential habitat (brittle bush scrub) for Quino checkerspot butterfly. This species is listed as federally endangered and is a Covered Species under the MSHCP. Due to the small and relatively isolated nature of the potential habitat, the number of individual Quino checkerspot butterflies potentially affected would be very low. Regardless, the loss of potential habitat for Quino checkerspot butterfly would be mitigated through compliance with the MSHCP and payment of MSHCP development fees. As such, Project impacts to the Quino checkerspot butterfly would be less than significant. (GLA, 2021a, p. 65)
- **Stephens’ Kangaroo Rat (SKR).** An estimated 30.35 acres of potential habitat for SKR (brittle bush scrub) occurs within the Study Area, of which approximately 19.48 acres are proposed for permanent impacts. Impacts to SKR occupied habitat could be a potentially significant impact under CEQA; however, the impacts are covered under the SKR HCP. The proposed Project occurs within the SKR Fee Assessment Area. All projects located within Fee Assessment Area are required to pay the SKR fee, which therefore provides coverage for the SKR. Participation with the SKR HCP mitigates any impacts to SKR to a less than significant level. As such, with mandatory payment of fees pursuant to Riverside County Ordinance No. 663, Project impacts to the SKR would be less than significant. (GLA, 2021a, p. 66)

2. *Impacts to Non-Listed Species*

In addition to the listed species discussed above, the proposed Project would impact habitat for the following non-listed and/or special-status species that have potential to occur but that are covered by the MSHCP: 1) Reptiles: coast horned lizard and red-diamond rattlesnake 2) Birds: burrowing owl, loggerhead shrike, northern harrier hawk (foraging role only), and white-tailed kite; and 3) Mammals: northwestern San Diego pocket mouse and San Diego desert woodrat. The proposed Project would impact habitat for the following non-listed and/or special-status species that have potential to occur but that are not covered by the MSHCP: 1) Reptiles: coast patch-nosed snake. (GLA, 2021a, p. 66)

Non-Listed Species, MSHCP Covered

Burrowing Owl

L&L conducted focused burrowing owl surveys in 2004 and 2005. GLA conducted additional focused burrowing owl surveys in 2006. No burrowing owls or presence thereof were detected during any previous



surveys for the Project. GLA biologists conducted updated focused burrowing owl surveys for the Project in 2020. Burrowing owls were not detected within the Project site or within any adjacent areas. (GLA, 2021a, p. 66)

There is approximately 96.77 acres of potential habitat (brittle bush scrub, disturbed chamise chaparral, disturbed California buckwheat scrub) within the Study Area, of which approximately 64.61 acres occurs within areas planned for impact as part of the Project. (GLA, 2021a, p. 66)

As noted above, MSHCP Objective 6 for burrowing owls requires pre-construction surveys prior to site grading. Although focused surveys conducted for the proposed Project determined that the burrowing owl is absent from the Study Area, there is nonetheless a potential for the site to become occupied with burrowing owls prior to construction activities. This is evaluated as a potentially significant impact for which mitigation, in the form of pre-construction burrowing owl surveys, would be required. (GLA, 2021a, p. 66)

Other Non-Listed Species

Proposed impacts to coast horned lizard, loggerhead shrike (foraging role only), northwestern San Diego pocket mouse, northern harrier (foraging role only), red-diamond rattlesnake, San Diego desert woodrat, and white-tailed kite, would be less than significant under CEQA. This is based on the number of individuals potentially affected, the species role in the Project site, and/or whether the species remains “common” to the region. Regardless, these species are designated as covered species under the MSHCP, and the loss of habitat for these species would be covered through the MSHCP and payment of development fees. (GLA, 2021a, pp. 66-67)

Non-Listed Species Not Covered by the MSHCP

Proposed impacts to coast patch-nosed snake would be less than significant under CEQA. This species is not covered under the MSHCP but impacts to this species would be less than significant as a result of a low level of sensitivity, low quality of habitat onsite, low numbers of individuals that would potentially be expected to be impacted by the proposed Project, and/or whether the species remains “common” to the region. (GLA, 2021a, p. 67)

3. *Impacts to Nesting Birds*

The Project has the potential to impact active bird nests if vegetation is removed during the nesting season (February 1 to August 31). The California Fish and Game Code prohibits mortality of native birds, including eggs. Accordingly, Project impacts to nesting birds would be potentially significant prior to mitigation. (GLA, 2021a, p. 76)

Threshold d: Would the Project 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?

While most of the Project site occurs outside of proposed core/linkage areas, the eastern end of the project site does occur within Proposed Constrained Linkage 6 of the Estelle Mountain/Indian Canyon Subunit of the



MSHCP. This proposed linkage focuses on conserving the eastern 40% to 50% of areas within Criteria Cell 3748 and places an emphasis on conserving riparian areas that drain into Temescal Wash. The purpose of the proposed linkage is to connect Proposed Core 1, Proposed Extension of Existing Core 2, and Proposed Linkage 1. The proposed impacts to criteria areas and cells triggered the MSHCP JPR process (JPR No. 04-11-30-01). In 2003 a HANS application was submitted for the Project (HANS No. 206); after several correspondences with the RCA, it was determined that designating approximately 27.1 acres on the eastern edge of the Project as Open Space Conservation would be sufficient to meet the requirements of Proposed Constrained Linkage 6. The proposed Project is consistent with the conservation areas identified by the JPR and HANS processes, as the Project would accommodate 27.1 acres within proposed Planning Areas 5 and 6 of SP 333A1. Additionally, due to the limited size of the Project impacts on these areas and the limited potential for wildlife movement from the adjacent residential development, these impacts would only have an impact on local wildlife movement and would not represent a significant impact to wildlife movement with mitigation afforded by the MSHCP. Accordingly, Project impacts to wildlife movement corridors would be less than significant. (GLA, 2021a, pp. 68-69)

The Project site lacks wildlife nursery sites. The Project site lacks sufficient habitat features to support colonies of nesting birds or large numbers of roosting bats. No impact to wildlife nursery sites would occur. (GLA, 2021a, p. 69)

Threshold e: *Would the Project 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?*

The proposed Project would permanently impact approximately 120.29 acres of lands through grading, including areas of remedial grading that would not be restored to pre-Project conditions. Permanent impacts include approximately 19.48 acres of brittle bush scrub, 33.86 acres of disturbed California buckwheat scrub, 11.31 acres of disturbed chamise chaparral, 3.36 acres of southern cottonwood willow riparian forest, 0.04 acre of disturbed/developed ornamental areas, and 52.54 acres of upland mustards. The Project would avoid 3.47 acres of unvegetated wash, 10.87 acres of brittle bush scrub, 18.24 acres of disturbed California buckwheat scrub, 3.01 acres of disturbed chamise chaparral, 1.98 acres of southern cottonwood willow riparian forest, and 2.95 acres of upland mustards. All direct impacts associated with the Project would be permanent. Table 4.4-8, *Summary of Vegetation/Land Use Impacts*, provides a summary of impacts to vegetation/land use types. The only sensitive vegetation community that would be impacted by the Project is southern cottonwood willow riparian forest, as discussed below. (GLA, 2021a, p. 67)

The Project would permanently impact 3.36 acres of southern cottonwood willow riparian forest, which as a riparian community and is considered a sensitive community under CEQA. Additionally, southern cottonwood willow riparian forest is listed under the CNDDDB as a G3 S3.2 special vegetation community, indicating that this vegetation community provides habitat for species that are considered rare to uncommon, and for species that are either very rare and local throughout their range or found abundantly in a restricted range. Furthermore, the loss of riparian habitat must be mitigated pursuant to the MSHCP riparian/riverine policies. However, a majority of the compensatory mitigation has already been purchased from the Riverside-Corona Resource



Conservation District at their Lee Lake Preserve, consisting of 13.92 acres of habitat creation and conservation, and through 9.28 acres of habitat restoration and *Arundo donax* removal within Bedford Canyon Wash. Only 0.05-acre of off-site impact to southern cottonwood willow riparian forest located south of the Project near Bolo Court has not yet been mitigated. Thus, prior to mitigation, Project impacts to 0.05 acre of southern cottonwood willow riparian forest off site would represent a significant impact for which mitigation would be required. None of the other vegetation communities to be impacted by the Project are considered to comprise sensitive communities. (GLA, 2021a, pp. 67-68)

Table 4.4-8 Summary of Vegetation/Land Use Impacts

Vegetation/Land Use Type	Onsite Impacts (Acres)	Offsite Impacts (Acres)	Total Impacts (Acres)	Avoidance (Acres)
Brittle Bush Scrub	18.74	0.74	19.48	10.87
Disturbed California Buckwheat Scrub	33.85	0.01	33.86	18.24
Disturbed Chamise Chaparral	11.31	0	11.31	3.01
Southern Cottonwood Willow Riparian Forest	3.07	0.29	3.36	1.98
Unvegetated Wash	0	0	0	3.47
Disturbed/Developed Ornamental	0	0.04	0.04	0
Upland Mustards	49.55	2.69	52.24	2.95
Total	116.52	3.77	120.29	40.52

(GLA, 2021a, Table 5-1)

Threshold f: *Would the Project 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?*

The jurisdictional features contained in the biological report are derived from GLA’s interpretation of the Project’s jurisdictional delineation report prepared by L&L dated May 2005, as well as the existing approved regulatory permits issued by the Corps, Regional Board, and CDFW for the Project. Specifically, areas designated as “State wetlands” in the L&L 2005 report have been interpreted as signifying riparian habitat, and not federally-recognized wetlands. (GLA, 2021a, p. 68)

Implementation of the proposed Project would permanently impact 1.95 acres (1.87 acre onsite, 0.08 acre offsite) of Corps jurisdiction, of which 0.13 acre consists of jurisdictional wetlands. Implementation of the proposed Project would permanently impact 1.95 acres (1.87 acres on site and 0.08 acre off site) of Regional Board jurisdiction, of which 0.13 acre consists of jurisdictional wetlands. The Project also would permanently impact 4.95 acres (4.64 acres onsite, 0.31 acre offsite) of CDFW jurisdiction, of which 4.00 acres (3.72 acres onsite, 0.28 acre offsite) consists of CDFW riparian habitat. A total of 8,151 linear feet (7,451 linear feet onsite, 700 linear feet offsite) of ephemeral streambed would be removed. The Project would permanently fill the entire lengths of Channels 1, 3, and 5, and portions of Channels 2, 4, 6, and 7, as shown in Appendix C to the



Project’s BTR (*Technical Appendix C1*). The Project also would result in 0.25 acre of temporary impact to CDFW jurisdictional areas. (GLA, 2021a, p. 71)

Regulatory permits and agreements from the Corps, the CDFW, and the Regional Board have already been issued and a majority of the compensatory mitigation has been completed (i.e., for all but 0.03 acre of Corps/Regional Board jurisdiction and 0.05 acre of CDFW jurisdiction). A DBESP for the Project was submitted in 2003 and approved in 2006, and the conditions listed therein were satisfied. Mitigation measures for impacts to jurisdictional waters have been approved through the permitting process. As part of the mitigation, 24.20 acres of offsite mitigation credits were previously purchased. As such, and with exception of off-site impacts to 0.03 acre of Corps/Regional Board jurisdiction and 0.05 acre of CDFW jurisdiction that were not accounted for in the previously-approved DBESP, mitigation for impacts to a majority of Corps/Regional Board and CDFW jurisdictional areas already has occurred. Thus, and with exception of impacts to 0.05 acre of off-site impacts to CDFW jurisdictional areas, Project impacts to Corps/Regional Board and CDFW jurisdictional areas would be less than significant. (GLA, 2021a, p. 71)

As noted above, the Project would result in off-site impacts to 0.03 acre of Corps/Regional Board jurisdiction and 0.05 acre of CDFW jurisdiction that were not accounted for in the previously-approved DBESP or regulatory permits. As such, the previously-issued permits/agreements for the Project would need to be amended to incorporate the updated project description and the additional impact to 0.03 acre of Corps/Regional Board jurisdiction and 0.05 acre of CDFW jurisdiction, and to identify compensatory mitigation for the impacts. Accordingly, Project impacts to 0.03 acre of Corps/Regional Board jurisdiction and 0.05 acre of CDFW jurisdiction represent a significant impact prior to mitigation. (GLA, 2021a, p. 71)

Threshold g: Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Aside from the SKR HCP and the MSHCP, which are addressed under the analysis of Threshold a., the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines and Riverside County Ordinance No. 559 (Regulating the Removal of Trees).

Riverside County Ordinance No. 559 applies to properties located above 5,000 feet amsl in elevation, while the maximum elevation at the Project site is approximately 1,430 feet amsl; thus, Riverside County Ordinance No. 559 is not applicable to the proposed Project (Google Earth, 2018).

No oak trees were detected within the Study Area during the 2020 surveys conducted by GLA. An Oak Tree Survey performed by L&L in 2003 identified two clusters of coast live oaks and several clusters of scrub oak (*Quercus berberidifolia*) on site. Of the oaks present, only the coast live oaks would have qualified for protection/mitigation, as both had diameter-breast-height measurements greater than 2.5 inches. In 2007, all vegetation within the Project site was removed. As of 2020 field surveys, no large oak trees were detected on site. GLA did not observe any oak trees within the development footprint, and it is assumed that all oak trees previously present on site were removed in 2007, and that the Project will not be subject to the guidelines



moving forward. As such, the Project has no potential to conflict with the Riverside County Oak Tree Management Guidelines. (GLA, 2021a, p. 69)

Based on the foregoing analysis, the Project would not conflict with any local policies or ordinances protecting biological resources, and impacts would be less than significant.

4.4.5 CUMULATIVE IMPACT ANALYSIS

The cumulative impact analysis considers development of the Project in conjunction with other development projects located within the purview of the Western Riverside County MSHCP. This Study Area for cumulatively-considerable impacts to biological resources is appropriate because the MSHCP encompasses a large area surrounding the Project site, and provides for the long-term protection of sensitive plant, animal, and plant communities throughout the MSHCP area. Additionally, most cumulative development projects within the Project vicinity would be subject to the provisions of the MSHCP, and the general range of habitats, species, climate, etc. are fairly consistent throughout the MSHCP.

As indicated under the analysis of Threshold a., with mandatory payment of fees pursuant to Riverside County Ordinance No. 663, the Project would not conflict with the SKR HCP. Other developments within the cumulative study area also would be required to contribute fees towards the SKR HCP pursuant to Ordinance No. 663 or the implementing ordinances of cities within the cumulative study area; thus, Project impacts due to a conflict with the SKR HCP would be less than significant on a cumulatively-considerable basis. With respect to the MSHCP, the Project would preserve as open space areas identified by the MSHCP for long-term conservation. As such, the Project would not conflict with the MSHCP Reserve Assembly requirements, and cumulatively-considerable impacts would be less than significant. Additionally, although mitigation for impacts to riparian/riverine resources has already been completed in conformance with the previously-approved DBESP, the Project would result in impacts to an additional 0.05 acre of riparian habitat associated with off-site drainage improvements near Bolo Court. As other cumulative developments within the study area also have the potential to result in impacts to riparian habitat, the Project's impacts to 0.05 acre of riparian habitat and associated potential to conflict with Volume I, Section 6.1.2 of the MSHCP represents a cumulatively-considerable impact for which mitigation would be required. The Project site does not contain any narrow endemic plant species; thus, the Project has no potential to result in cumulatively-considerable impacts due to a conflict with Volume I, Section 6.1.3 of the MSHCP. However, the Project has the potential to result in indirect noise and lighting impacts to MSHCP conservation areas, and also may result in potential impacts to burrowing owls if the site becomes occupied prior to the commencement of construction. As other cumulative developments in the region also have the potential to result in indirect impacts to MSHCP conservation areas and/or burrowing owls, the Project's indirect impacts to MSHCP conservation areas represents a cumulatively-considerable impact.

As discussed under the analysis of Thresholds b. and c., the Project has the potential to result in a significant impact to the CAGN if construction activities were to occur during the nesting season. Additionally, the Project has the potential to impact the burrowing owl if the site were to become occupied with burrowing owls prior to construction activities. As other cumulative developments also have the potential to impact CAGN



and/or the burrowing owl during the nesting season, Project impacts would be cumulatively considerable. Furthermore, the Project has the potential to impact active bird nests if vegetation is removed during the nesting season (February 1 to August 31). As other cumulative developments also have the potential to result in impacts to nesting birds, Project impacts to nesting birds would be cumulatively-considerable prior to mitigation.

As indicated under the analysis of Threshold d., the Study Area does not contain any wildlife nursery sites; thus, cumulatively-considerable impacts to wildlife nursery sites would not occur. Additionally, the Project would conserve 27.1 acres of the site as permanent open space, which would implement the MSHCP conservation objectives for the site. Additionally, due to the limited size of the Project impacts on these areas and the limited potential for wildlife movement from the adjacent residential development, these impacts would only have an impact on local wildlife movement and would not represent a significant impact to wildlife movement with mitigation afforded by the MSHCP. As such, Project impacts to wildlife movement corridors would be less than significant on a cumulatively-considerable basis.

As discussed under the analysis of Threshold e., the Project would permanently impact 3.36 acres of southern cottonwood willow riparian forest, which is a riparian community and is considered a sensitive community under CEQA. Although mitigation for 3.31 acres of impacts to southern cotton willow riparian forest already has occurred through the purchase of credits from the Riverside-Corona Resource Conservation District at their Lee Lake Preserve, consisting of 13.92 acres of habitat creation and conservation, and through 9.28 acres of habitat restoration and *Arundo donax* removal within Bedford Canyon Wash, mitigation still is needed for impacts to 0.05 acre of southern cottonwood willow riparian forest that would occur with Project-related off-site drainage improvements near Bolo Court. As such, the Project's impacts to an additional 0.05 acre of southern cottonwood willow riparian forest would be cumulatively considerable and mitigation would be required. There are no other sensitive vegetation communities that would be impacted by the Project, and thus, cumulatively-considerable impacts would not occur.

The Project would permanently impact 1.95 acres (1.87 acre onsite, 0.08 acre offsite) of Corps jurisdiction, of which 0.13 acre consists of jurisdictional wetlands, and would impact 4.00 acres of CDFW riparian habitat (3.72 acres onsite, 0.28 acre offsite). Regulatory permits and agreements from the Corps, the CDFW, and the Regional Board have already been issued and a majority of the compensatory mitigation has been completed (i.e., for all but 0.03 acre of Corps/Regional Board jurisdiction and 0.05 acre of CDFW jurisdiction) pursuant to the previously-approved Section 401 Water Quality Certification (issued in 2005), CWA Section 404 permit (issued in 2005 and extended in 2015), 1602 Streambed Alteration Agreement (issued in 2004, amended in 2013, and extended in 2019), and the Project's DBESP (approved in 2006). However, Project impacts to 0.03 acre of Corps/Regional Board jurisdiction and 0.05 acre of CDFW jurisdiction have not been permitted or mitigated. As such, the previously-issued permits/agreements for the Project would need to be amended to incorporate the updated project description and the additional impacts. Other cumulative developments also have the potential to impact jurisdictional waters or wetlands. Therefore, Project impacts to 0.03 acre of Corps/Regional Board jurisdiction and 0.05 acre of CDFW jurisdiction represent a cumulatively-considerable impact prior to mitigation.



As indicated under the analysis of Threshold g., aside from the SKR HCP and MSHCP (which are addressed under the analysis of Threshold a.), the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). However, the Project site does not contain any oak trees that would be subject to the County's Oak Tree Management Guidelines, and Riverside County Ordinance No. 559 applies only to properties located above 5,000 feet amsl. Accordingly, Project impacts due to a conflict with local policies or ordinances protecting biological resources would be less-than-cumulatively considerable.

4.4.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Significant Direct and Cumulatively-Considerable Impact. The proposed Project would not conflict with the Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP), with the mandatory payment of fees pursuant to Riverside County Ordinance No. 663. The Project would not result in a conflict with the MSHCP Reserve Assembly requirements. Although impacts to 4.95 acres of riparian/riverine resources were previously mitigated in compliance with the previously-approved DBESP for Project, the Project would result in impacts to an additional 0.05-acre riparian area near Bolo Court that was not previously addressed by the DBESP. Accordingly, Project impacts due to a conflict with Volume I, Section 6.1.2 of the MSHCP would be potentially significant prior to mitigation. The Project would not result in impacts to narrow endemic plants, and thus would be consistent with Volume I, Section 6.1.3 of the MSHCP. However, Project-related lighting and noise has the potential to result in indirect impacts to the MSHCP Conservation Area, representing a potential conflict with the MSHCP Urban/Wildland Interface requirements. In addition, although focused surveys conducted for the proposed Project determined that the burrowing owl is absent from the Study Area, there is nonetheless a potential for the site to become occupied with burrowing owls prior to construction activities. This is evaluated as a potentially significant impact due to a conflict with MSHCP Objective 6 for burrowing owls, for which mitigation would be required in the form of pre-construction surveys and avoidance of any nesting burrowing owls. Project impacts due to a potential conflict with the MSHCP would be significant on both a direct and cumulatively-considerable basis.

Thresholds b. and c.: Significant Direct and Cumulatively-Considerable Impact. Development of the proposed Project would remove 64.61 acres of habitat (brittle bush scrub, disturbed chamise chaparral, disturbed California buckwheat scrub) for the CAGN. The Project has the potential to result in a significant impact to the CAGN if construction activities were to occur during the nesting season. Additionally, there is a potential for the site to become occupied with burrowing owls prior to construction activities. This is evaluated as a potentially significant impact for which mitigation, in the form of pre-construction burrowing owl surveys, would be required. Potential impacts to the CAGN and burrowing owl would be significant on both a direct and cumulatively-considerable basis. Impacts to other endangered, threatened, sensitive, and/or special-status species would be less than significant. Additionally, the Project has the potential to impact active bird nests if vegetation is removed during the nesting season (February 1 to August 31). The California Fish and Game Code prohibits mortality of native birds, including eggs. Accordingly, Project impacts to nesting birds would be potentially significant prior to mitigation.



Threshold d.: Less-than-Significant Impact. The Project would not 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, and impacts would be less than significant.

Threshold e.: Significant Direct and Cumulatively-Considerable Impact. The Project would permanently impact 3.36 acres of southern cottonwood willow riparian forest, which is a riparian community and is considered a sensitive community under CEQA. Although compensatory mitigation for impacts to 3.31 acres of southern cottonwood willow riparian forest already has occurred through credits purchased from the Riverside-Corona Resource Conservation District at their Lee Lake Preserve, consisting of 13.92 acres of habitat creation and conservation, and through 9.28 acres of habitat restoration and *Arundo donax* removal within Bedford Canyon Wash, the Project would result in impacts to an additional 0.05 acre of southern cottonwood willow riparian forest for which compensatory mitigation has not yet been completed. Thus, Project impacts to an additional 0.05 acre of southern cottonwood willow riparian forest would be significant prior to mitigation. The Project would not result in any other impacts to riparian habitat or sensitive natural communities.

Threshold f.: Significant Direct and Cumulatively-Considerable Impact. The Project would result in permanent impacts to 1.95 acres (1.87 acre onsite, 0.08 acre offsite) of Corps jurisdiction, of which 0.13 acre consists of jurisdictional wetlands. The Project also would permanently impact 4.95 acres (4.64 acres onsite, 0.31 acre offsite) of CDFW jurisdiction, of which 4.00 acres (3.72 acres onsite, 0.28 acre offsite) consists of CDFW riparian habitat. Although compensatory mitigation for a majority of these impacts to jurisdictional areas already has been completed in accordance with authorized site jurisdictional permit approvals, which included a Section 401 Water Quality Certification in 2005, a CWA Section 404 permit in 2005 (extended in 2015), and a 1602 Streambed Alteration Agreement in 2004 (amended in 2013 and extended in 2019), the Project would result in off-site impacts to 0.03 acre of Corps/Regional Board jurisdiction and 0.05 acre of CDFW jurisdiction that were not accounted for in the previously-approved DBESP or regulatory permits. As such, the previously-issued permits/agreements for the Project would need to be amended to incorporate the updated project description and to identify mitigation for the additional impact to 0.03 acre of Corps/Regional Board jurisdiction and 0.05 acre of CDFW jurisdiction. Accordingly, Project impacts to 0.03 acre of Corps/Regional Board jurisdiction and 0.05 acre of CDFW jurisdiction represent a significant impact prior to mitigation.

Threshold g.: No Impact. Aside from the SKR HCP and MSHCP, which are addressed under the analysis of Threshold a., the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). However, the Project site does not contain any oak trees subject to the Riverside County Oak Tree Management Guidelines. Additionally, the Project site does not occur at an elevation exceeding 5,000 feet amsl; thus, Riverside County Ordinance No. 559 is not applicable to the proposed Project. Therefore, and aside from potential impacts due to a conflict with the MSHCP (as addressed under the analysis of Threshold a.), the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no impact would occur.



4.4.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- Prior to issuance of grading permits, the Project Applicant shall make payment of Western Riverside County MSHCP fees pursuant to Riverside County Ordinance No. 810, *Establishing an Interim Open Space Mitigation Fee*.
- Prior to issuance of grading permits, the Project Applicant shall make payment of fees pursuant to the Stephen's Kangaroo Rat Habitat Conservation Plan and Riverside County Ordinance No. 663, *Establishing the Riverside County Stephens' Kangaroo Rat Habitat Conservation Plan and Setting Mitigation Fees*.
- As a condition of approval for future grading and building permits, the County of Riverside shall require that the Project Applicant must delineate areas planned for long-term conservation as open space (i.e., open space within Planning Areas 5 and 6 of the Renaissance Ranch Commerce Center Specific Plan No. 333, Amendment No. 1) with construction fencing in order to preclude direct and indirect impacts to sensitive biological resources within the open space areas.
- Prior to issuance of grading permits affecting waters of the U.S. and/or waters of the State, the Project Applicant shall secure amended regulatory permits and agreements from the U.S. Army Corps of Engineers, the California Department of Fish and Wildlife, and the Santa Ana Regional Water Quality Control Board. The amendments to these permits and agreements are required to reflect revisions to the description of the proposed Project, although no changes are proposed to areas planned for physical impacts, and no new or modified mitigation is required as part of the required amendments. Copies of each of these permits and agreements shall be provided to the County Environmental Programs Department before grading occurs within State or federal jurisdictional waters.

Mitigation

MM 4.4-1 In the event that nighttime construction is proposed as part of future building permits, then prior to commencement of nighttime construction activities, the Property Owner/Developer shall provide evidence to the County that the Contractor Specifications require that any temporary nighttime lighting installed during construction shall be downward facing and hooded or shielded to prevent security light from spilling outside the staging area or from directly broadcasting security light into the sky, onto adjacent residential properties, or into the open space areas within Planning Areas 5 and 6. Project contractors shall be required to permit periodic inspection of the construction site by Riverside County staff or its designee to confirm compliance.



MM 4.4-2 Prior to approval of implementing developments (i.e., plot plans, building permits, etc.) affecting lands adjacent to the on-site MSHCP Conservation Areas (i.e., proposed Conservation Areas within Planning Areas 5 and 6 of the Renaissance Ranch Commerce Center Specific Plan No. 333, Amendment No. 1), the Project Applicant shall prepare and Riverside County shall review and approve an acoustical analysis to determine whether long-term operational noise associated with the implementing development would expose the proposed MSHCP Conservation Areas to noise levels exceeding 65 dBA CNEL. In the event that the analysis shows that future site operations would expose the Conservation Areas to noise levels exceeding 65 dBA CNEL, the required acoustical analysis shall incorporate recommendations to reduce Project-related operational noise affecting the Conservation Areas to below 65 dBA CNEL. Noise attenuation measures may include, but are not necessarily limited to, the incorporation of screen walls or other barriers (such as berms). Prior to issuance of building permits, the Riverside County Building and Safety Department shall ensure that any required noise attenuation measures have been incorporated into the plans, and shall verify that the noise attenuation measures have been implemented prior to final building inspection.

MM 4.4-3 In accordance with MSHCP Objective 6, prior to issuance of grading permits or other permits authorizing ground disturbance or discing, the Project Applicant shall retain a qualified biologist to perform a burrowing owl survey at all potentially suitable habitat sites within the Project's limits of disturbance within 30 days of the commencement of any ground-disturbing activities at the Project site, as discussed below.

- **Pre-Construction Survey:** The pre-construction survey shall be performed by a qualified biologist that will survey the site for the presence/absence of burrowing owls within 30 days prior to commencement of ground-disturbing activities at the Project site. If burrowing owls are detected on-site during the pre-construction survey, the owls shall be relocated/excluded from the site outside of the breeding season following accepted protocols, and subject to the approval of the Western Riverside County Regional Conservation Authority (RCA) and Wildlife Agencies (i.e., CDFW and/or USFWS).
- **Burrowing Owl Management Plan:** In the event that burrowing owl is determined to be present, or in the event that an assumption is made that the burrowing owl occurs on-site, a burrowing owl management plan shall be prepared and implemented in coordination with the RCA and CDFW that shall detail the relocation of owls from the Project site, passively and/or actively. If additional site visits determine the species is absent, then the pre-construction survey (as discussed above) shall instead be implemented.

A copy of the results of the pre-construction survey (and all additional surveys), as well as copies of the Burrowing Owl Management Plan, if required, shall be provided to the County of Riverside Planning Department for review and approval (in the case of the Burrowing Owl Management Plan) prior to any vegetation clearing and ground disturbance activities.



- MM 4.4-4 In the event that grading or other ground-disturbing activities are proposed within habitat suitable to support the coastal California gnatcatcher (i.e., brittle bush scrub, disturbed chamise chaparral, or disturbed California buckwheat scrub, as shown on Figure 4.4-1 of the Project's EIR), Riverside County shall impose conditions of approval on future grading permits requiring focused surveys to be conducted if ground disturbance or discing activities are proposed to occur during the nesting season (i.e., between March 1 and August 15). The results of the focused surveys shall be provided to the Riverside County Environmental Programs Department (EPD) for review and approval prior to commencement of ground disturbing or discing activities during the nesting season. In the event that the focused surveys do not identify the presence of California gnatcatcher, then ground disturbance or discing may occur during the nesting season (i.e., between March 1 and August 15). In the event that the focused surveys identify the presence of California gnatcatchers, then ground disturbance or discing of the occupied areas shall be prohibited between March 1 and August 15. Project contractors shall be required to ensure compliance with these requirements and permit periodic inspection of the construction site by Riverside County staff or its designee to confirm compliance.
- MM 4.4-5 Prior to the issuance of grading permits, Riverside County shall ensure that the following note is included on the Project's grading plans. Project contractors shall be required to ensure compliance with this note and permit periodic inspection of the construction site by Riverside County staff or its designee to confirm compliance. This note also shall be specified in bid documents issued to prospective construction contractors.

“Vegetation clearing shall be conducted outside of the bird nesting season (February 1 to August 31) to the extent feasible. If avoidance of the nesting season is not feasible, a nesting bird survey shall be conducted by a qualified biologist within no more than 72 hours of such scheduled disturbance, to determine the presence of nests or nesting birds. If active nests are identified, the biologist shall establish appropriate buffers around the vegetation (typically 500 feet for raptors and sensitive species, 300 feet for non-raptors/non-sensitive species). All work within these buffers shall be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The biologist shall review and verify compliance with these nesting boundaries and shall verify the nesting effort has finished. Work may resume within the buffer area when no other active nests are found. Alternatively, a qualified biologist may determine that construction can be permitted within the buffer areas and would develop a monitoring plan to prevent any impacts while the nest continues to be active (eggs, chicks, etc.). Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to Riverside County for mitigation monitoring compliance record keeping. If vegetation removal is not completed within 72 hours of a negative survey during nesting season, the nesting survey must be repeated to confirm the absence of nesting birds.”



- MM 4.4-6 Prior to issuance of a grading permit affecting areas containing waters of the United States or waters of the State, the Project Applicant shall secure amended regulatory permits and agreements from the U.S. Army Corps of Engineers, the California Department of Fish and Wildlife, and the Santa Ana Regional Water Quality Control Board. Copies of each of these permits and agreements shall be provided to the County Environmental Programs Department (EPD) before grading occurs within State or federal jurisdictional waters.
- MM 4.4-7 Prior to issuance of grading permits, the Project Applicant shall mitigate additional impact to 0.05 acre of MSHCP Riparian habitat located south of the Project near Bolo Court through the purchase of 0.075-acre of re-establishment credits (a 1.5:1 mitigation-to-impact ratio) and 0.075-acre of rehabilitation mitigation credits (a 1.5:1 mitigation-to-impact ratio) at the Riverpark Mitigation Bank in accordance with the Project's Determination of Biologically Superior or Equivalent Preservation (DBESP), dated October 2021 (*Technical Appendix C2* to the Project's Environmental Impact Report). Evidence demonstrating compliance with this measure, including supporting documentation, shall be submitted to the Riverside County Environmental Programs Department (EPD) to verify that impacts have been fully mitigated prior to issuance of grading permits.

4.4.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold a.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measures MM 4.4-6 and MM 4.4-7 would ensure that Project impacts to 0.05-acre riparian habitat is permitted and mitigated at a minimum 3:1 ratio in accordance with the Project's DBESP. With implementation of the required mitigation, the Project would be consistent with Volume I, Section 6.1.2 of the MSHCP. Implementation of Mitigation Measure MM 4.4-1 would ensure that measures are incorporated into the Project's construction phase to preclude significant construction-related nighttime lighting impacts affecting the proposed on-site MSHCP Conservation Area, while Mitigation Measure MM 4.4-2 would ensure that measures are incorporated into future development plans for the site, if necessary, to ensure that future on-site operations do not expose the proposed on-site MSHCP Conservation Area to noise levels exceeding 65 dBA CNEL. Thus, with implementation of Mitigation Measures MM 4.4-1 and MM 4.4-2, the Project would be fully consistent with Section 6.1.4 of the MSHCP. In addition, implementation of Mitigation Measure MM 4.4-3 would ensure that appropriate pre-construction surveys are conducted prior to ground disturbing activities, in accordance with MSHCP Objective 6 for the burrowing owl. With implementation of the required mitigation, the Project would be fully consistent with all applicable MSHCP requirements, and impacts would be reduced to below a level of significance.

Thresholds b. and c.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.4-4 would ensure that focused surveys are conducted for the coastal California gnatcatcher if grading or other ground-disturbing activities are proposed within suitable habitat for this species during the nesting season (i.e., between March 1 and August 15), and further requires avoidance of any identified occupied habitat during the nesting season. Implementation of the required mitigation would reduce impacts to the coastal California gnatcatcher to below a level of significance. In addition, implementation of Mitigation



Measure MM 4.4-3 would ensure that appropriate pre-construction surveys for the burrowing owl are conducted prior to ground disturbing activities, and requires implementation of a Burrowing Owl Management Plan in the event burrowing owls are determined to be present within areas proposed for impact. Implementation of the required mitigation would reduce Project impacts to the burrowing owl to less-than-significant levels. In the event that Project construction activities occur during the nesting season for birds (February 1 to August 31), Mitigation Measure MM 4.4-5 would ensure pre-construction nesting surveys are conducted prior to commencement of construction activities, and would further ensure appropriate avoidance of any active nests that may be identified. Implementation of the required mitigation would reduce Project impacts to nesting birds to below a level of significance.

Threshold e.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measures MM 4.4-6 and MM 4.4-7 would ensure that Project impacts to the additional 0.05 acres of riparian habitat (southern cottonwood willow riparian forest) are appropriately permitted and mitigated at a minimum 3:1 ratio in accordance with the Project's DBESP. With implementation of the required mitigation, Project impacts to riparian habitat and sensitive natural communities would be reduced to below a level of significance.

Threshold f.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measures MM 4.4-6 and MM 4.4-7 would ensure that Project impacts to 0.05 acre of CDFW jurisdiction (inclusive of impacts to 0.03 acre of Corps/Regional Board jurisdiction) are appropriately permitted and mitigated at a minimum 3:1 ratio in accordance with the Project's DBESP. Implementation of the required mitigation would ensure that Project impacts to State and federally protected wetlands are reduced to a level below significance.



4.5 CULTURAL RESOURCES

The analysis in this subsection is based on a site-specific Cultural Resources Assessment (herein, “CRA”) prepared by Brian F. Smith and Associates (“BFSA”), entitled “A Phase I And II Cultural Resources Assessment for the Renaissance Ranch Project,” dated February 5, 2021, and included as *Technical Appendix D* to this EIR (BFSA, 2021a). All references used in this Subsection are included in EIR Section 7.0, *References*. It should be noted that confidential information has been redacted from *Technical Appendix D* for purposes of public review. In addition, much of the written and oral communication between Native American tribes, the County of Riverside, and BFSA is considered confidential in respect to places that have traditional tribal cultural significance (Gov. Code § 65352.4), and although relied upon in part to inform the preparation of this EIR Subsection, those communications are treated as confidential and are not available for public review. Under existing law, environmental documents must not include information about the location of archeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (Cal. Code Regs. § 15120(d)).

4.5.1 EXISTING CONDITIONS

A. Prehistoric and Historic Setting

Paleo Indian, Archaic Period Milling Stone Horizon, and the Late Prehistoric Takic groups are the three general cultural periods represented in Riverside County. The following discussion of the cultural history of Riverside County references the San Dieguito Complex, Encinitas Tradition, Milling Stone Horizon, La Jolla Complex, Pauma Complex, and San Luis Rey Complex, since these culture sequences have been used to describe archaeological manifestations in the region. The Late Prehistoric component present in the Riverside County area was primarily represented by the Cahuilla, Gabrielino, and Luiseño Indians. Refer to Subsection 2.3 of the Project’s CRA (*Technical Appendix D*) for a complete description of the cultural setting of the Project area. (BFSA, 2021a, pp. 2.0-6 to 2.0-7)

1. Paleo Indian Period (Late Pleistocene: 11,500 to circa 9,000 YBP)

Archaeologically, the Paleo Indian Period is associated with the terminus of the late Pleistocene (12,000 to 10,000 Years Before Present [YBP]). The environment during the late Pleistocene was cool and moist, which allowed for glaciation in the mountains and the formation of deep, pluvial lakes in the deserts and basin lands. However, by the terminus of the late Pleistocene, the climate became warmer, which caused the glaciers to melt, sea levels to rise, greater coastal erosion, large lakes to recede and evaporate, extinction of Pleistocene megafauna, and major vegetation changes. The coastal shoreline at 10,000 YBP, depending upon the particular area of the coast, was near the 30-meter isobath, or two to six kilometers further west than its present location. (BFSA, 2021a, p. 2.0-7)

Paleo Indians were likely attracted to multiple habitat types, including mountains, marshlands, estuaries, and lakeshores. These people likely subsisted using a more generalized hunting, gathering, and collecting adaptation utilizing a variety of resources including birds, mollusks, and both large and small mammals. (BFSA, 2021a, p. 2.0-7)



2. *Archaic Period (Early and Middle Holocene: circa 9,000 to 1,300 YBP)*

Archaeological data indicates that between 9,000 and 8,000 YBP, a widespread complex was established in the southern California region, primarily along the coast. This complex is locally known as the La Jolla Complex, which is regionally associated with the Encinitas Tradition and shares cultural components with the widespread Milling Stone Horizon. The coastal expression of this complex appeared in southern California coastal areas and focused upon coastal resources and the development of deeply stratified shell middens that were primarily located around bays and lagoons. The older sites associated with this expression are located at Topanga Canyon, Newport Bay, Agua Hedionda Lagoon, and some of the Channel Islands. Radiocarbon dates from sites attributed to this complex span a period of over 7,000 years in this region, beginning over 9,000 YBP. (BFSA, 2021a, pp. 2.0-7 to 2.0-8)

The Encinitas Tradition is best recognized for its pattern of large coastal sites characterized by shell middens, grinding tools that are closely associated with the marine resources of the area, cobble-based tools, and flexed human burials. While ground stone tools and scrapers are the most recognized tool types, coastal Encinitas Tradition sites also contain numerous utilized flakes, which may have been used to pry open shellfish. Artifact assemblages at coastal sites indicate a subsistence pattern focused upon shellfish collection and nearshore fishing. This suggests an incipient maritime adaptation with regional similarities to more northern sites of the same period. Other artifacts associated with Encinitas Tradition sites include stone bowls, doughnut stones, discoidals, stone balls, and stone, bone, and shell beads. (BFSA, 2021a, p. 2.0-8)

The coastal lagoons in southern California supported large Milling Stone Horizon populations circa 6,000 YBP, as is shown by numerous radiocarbon dates from the many sites adjacent to the lagoons. The ensuing millennia were not stable environmentally, and by 3,000 YBP, many of the coastal sites in central San Diego County had been abandoned. The abandonment of the area is usually attributed to the sedimentation of coastal lagoons and the resulting deterioration of fish and mollusk habitat, which is a well-documented situation at Batiquitos Lagoon. Over a two-thousand-year period at Batiquitos Lagoon, dominant mollusk species occurring in archaeological middens shift from deep-water mollusks (*Argopecten* sp.) to species tolerant of tidal flat conditions (*Chione* sp.), indicating water depth and temperature changes. (BFSA, 2021a, p. 2.0-8)

By 5,000 YBP, an inland expression of the La Jolla Complex is evident in the archaeological record, exhibiting influences from the Campbell Tradition from the north. These inland Milling Stone Horizon sites have been termed “Pauma Complex.” By definition, Pauma Complex sites share a predominance of grinding implements (manos and metates), lack mollusk remains, have greater tool variety (including atlatl dart points, quarry-based tools, and crescentics), and seem to express a more sedentary lifestyle with a subsistence economy based upon the use of a broad variety of terrestrial resources. Although originally viewed as a separate culture from the coastal La Jolla Complex, it appears that these inland sites may be part of a subsistence and settlement system utilized by the coastal peoples. Evidence from the 4S Project in inland San Diego County suggests that these inland sites may represent seasonal components within an annual subsistence round by La Jolla Complex populations. Including both coastal and inland sites of this time period in discussions of the Encinitas Tradition, therefore, provides a more complete appraisal of the settlement and subsistence system exhibited by this cultural complex. (BFSA, 2021a, pp. 2.0-8 to 2.0-9)



More recent work has identified a more localized complex known as the Greven Knoll Complex. The Greven Knoll Complex is broken into three phases and obtained its name from the type-site Greven Knoll located in Yucaipa, California. Presently, the Greven Knoll Site is part of the Yukaipa't Site (SBR-1000) and was combined with the adjacent Simpson Site. Excavations at Greven Knoll recovered manos, metates, projectile points, discoidal coggled stones, and a flexed inhumation with a possible cremation. It is believed that the Greven Knoll Site was occupied between 5,000 and 3,500 YBP. The Simpson Site contained mortars, pestles, side-notched points, and stone and shell beads. (BFSA, 2021a, p. 2.0-9)

Phase I of the Greven Knoll Complex is generally dominated by the presence of manos and metates, core tools, hammerstones, large dart points, flexed inhumations, and occasional cremations. Mortars and pestles are absent from this early phase, and the subsistence economy emphasized hunting. Greven Knoll Phase II is associated with a period between 4,000 and 3,000 YBP. Artifacts common to Greven Knoll Phase II include manos and metates, Elko points, core tools, and discoidals. Pestles and mortars are present; however, they are only represented in small numbers. Finally, there is an emphasis upon hunting and gathering for subsistence. Greven Knoll Phase III includes manos, metates, Elko points, scraper planes, choppers, hammerstones, and discoidals. Again, small numbers of mortars and pestles are present. Greven Knoll Phase III spans from approximately 3,000 to 1,000 YBP and shows a reliance upon seeds and yucca. Hunting is still important, but bones seem to have been processed to obtain bone grease more often in this later phase. (BFSA, 2021a, pp. 2.0-9 to 2.0-10)

The shifts in food processing technologies during each of these phases indicate a change in subsistence strategies; although people were still hunting for large game, plant-based foods eventually became the primary dietary resource. It is posited that the development of mortars and pestles during the middle Holocene can be attributed to the year-round exploitation of acorns as a main dietary provision. Additionally, the warmer and drier climate may have been responsible for groups from the east moving toward coastal populations, which is archaeologically represented by the interchange of coastal and eastern cultural traits. (BFSA, 2021a, p. 2.0-10)

3. *Late Prehistoric Period (Late Holocene: 1,300 YBP to 1790)*

Many Luiseño hold the world view that as a population they were created in southern California; however, archaeological and anthropological data proposes a scientific/archaeological perspective. Archaeological and anthropological evidence suggests that at approximately 1,350 YBP, Takic-speaking groups from the Great Basin region moved into Riverside County, marking the transition to the Late Prehistoric Period. An analysis of the Takic expansion indicates that inland southern California was occupied by "proto-Yuman" populations before 1,000 YBP. The comprehensive, multi-phase model employs linguistic, ethnographic, archaeological, and biological data to solidify a reasonable argument for population replacement of Takic groups to the north by Penutians. As a result, it is believed that Takic expansion occurred starting around 3,500 YBP moving toward southern California, with the Gabrielino language diffusing south into neighboring Yuman (Hokan) groups around 1,500 to 1,000 YBP, possibly resulting in the Luiseño dialect. (BFSA, 2021a, p. 2.0-10)



The final Takic expansion would not have occurred until about 1,000 YBP, resulting in Vanyume, Serrano, Cahuilla, and Cupeño dialects. The model suggests that the Luiseño did not simply replace Hokan speakers, but were rather a northern San Diego County/southern Riverside County Yuman population who adopted the Takic language. This period is characterized by higher population densities and elaborations in social, political, and technological systems. Economic systems diversified and intensified during this period with the continued elaboration of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive, yet effective, technological innovations. Technological developments during this period included the introduction of the bow and arrow between A.D. 400 and 600 and the introduction of ceramics. Atlatl darts were replaced by smaller arrow darts, including Cottonwood series points. Other hallmarks of the Late Prehistoric Period include extensive trade networks as far-reaching as the Colorado River Basin and cremation of the dead. (BFSA, 2021a, p. 2.0-10)

4. *Protohistoric Period (Late Holocene: 1790 to Present)*

Ethnohistoric and ethnographic evidence indicates that three Takic-speaking groups occupied portions of Riverside County: the Cahuilla, the Gabrielino, and the Luiseño. The geographic boundaries between these groups in pre- and proto-historic times are difficult to place, but the Project site is located well within the borders of ethnographic Luiseño territory. This group was a seasonal hunting and gathering people with cultural elements that were very distinct from Archaic Period peoples. These distinctions include cremation of the dead, the use of the bow and arrow, and exploitation of the acorn as a main food staple. Along the coast, the Luiseño made use of available marine resources by fishing and collecting mollusks for food. Seasonally available terrestrial resources, including acorns and game, were also sources of nourishment for Luiseño groups. Elaborate kinship and clan systems between the Luiseño and other groups facilitated a wide-reaching trade network that included trade of Obsidian Butte obsidian and other resources from the eastern deserts, as well as steatite from the Channel Islands. (BFSA, 2021a, p. 2.0-11)

The primary settlements of Late Prehistoric Luiseño Indians in the San Jacinto Plain were represented by Ivah and Soboba near Soboba Springs, Jusipah near the town of San Jacinto, Ararah in Webster's Canyon en route to Idyllwild, Pahsitha near Big Springs Ranch southeast of Hemet, and Corova in Castillo Canyon. These locations share features such as the availability of food and water resources. Features of this land use include petroglyphs and pictographs, as well as widespread milling, which is evident in bedrock and portable implements. Groups in the vicinity of the project, neighboring the Luiseño, include the Cahuilla and the Gabrielino. Ethnographic data for the three groups is presented in Subsection 2.3 of the Project's CRA (*Technical Appendix D*). (BFSA, 2021a, p. 2.0-11)

5. *Ethnohistoric Period (1769 to Present)*

Traditionally, the history of the state of California has been divided into three general periods: the Spanish Period (1769 to 1821), the Mexican Period (1822 to 1846), and the American Period (1848 to present). The American Period is often further subdivided into additional phases: the nineteenth century (1848 to 1900), the early twentieth century (1900 to 1950), and the Modern Period (1950 to present). From an archaeological standpoint, all of these phases can be referred to together as the Ethnohistoric Period. This provides a valuable tool for archaeologists, as ethnohistory is directly concerned with the study of indigenous or non-Western



peoples from a combined historical/anthropological viewpoint, which employs written documents, oral narrative, material culture, and ethnographic data for analysis. (BFSA, 2021a, pp. 2.0-17 to 2.0-18)

European exploration along the California coast began in 1542 with the landing of Juan Rodriguez Cabrillo and his men at San Diego Bay. Sixty years after the Cabrillo expeditions, an expedition under Sebastian Viscaíno made an extensive and thorough exploration of the Pacific coast. Although the voyage did not extend beyond the northern limits of the Cabrillo track, Viscaíno had the most lasting effect upon the nomenclature of the coast. Many of his place names have survived, whereas practically every one of the names created by Cabrillo have faded from use. For instance, Cabrillo named the first (now) United States port he stopped at “San Miguel”; 60 years later, Viscaíno changed it to “San Diego” (Rolle 1969). The early European voyages observed Native Americans living in villages along the coast but did not make any substantial, long-lasting impact. At the time of contact, the Luiseño population was estimated to have ranged from 4,000 to as many as 10,000 individuals. (BFSA, 2021a, p. 2.0-18)

The historic background of the Project area began with the Spanish colonization of Alta California. The first Spanish colonizing expedition reached southern California in 1769 with the intention of converting and civilizing the indigenous populations, as well as expanding the knowledge of and access to new resources in the region. As a result, by the late eighteenth century, a large portion of southern California was overseen by Mission San Luis Rey (San Diego County), Mission San Juan Capistrano (Orange County), and Mission San Gabriel (Los Angeles County), who began colonization the region and surrounding areas. (BFSA, 2021a, p. 2.0-18)

Up until this time, the only known way to feasibly travel from Sonora to Alta California was by sea. In 1774, Juan Bautista de Anza, an army captain at Tubac, requested and was given permission by the governor of the Mexican State of Sonora to establish an overland route from Sonora to Monterey. In doing so, Juan Bautista de Anza passed through Riverside County and described the area in writing for the first time. In 1797, Father Presidente Lausen (of Mission San Diego de Alcalá), Father Norberto de Santiago, and Corporal Pedro Lisalde (of Mission San Juan Capistrano) led an expedition through southwestern Riverside County in search of a new mission site to establish a presence between San Diego and San Juan Capistrano. Their efforts ultimately resulted in the establishment of Mission San Luis Rey in Oceanside, California. (BFSA, 2021a, p. 2.0-18)

Each mission gained power through the support of a large, subjugated Native American workforce. As the missions grew, livestock holdings increased and became increasingly vulnerable to theft. In order to protect their interests, the southern California missions began to expand inland to try and provide additional security. In order to meet their needs, the Spaniards embarked on a formal expedition in 1806 to find potential locations within what is now the San Bernardino Valley. As a result, by 1810, Father Francisco Dumetz of Mission San Gabriel had succeeded in establishing a religious site, or capilla, at a Cahuilla rancheria called Guachama. San Bernardino Valley received its name from this site, which was dedicated to San Bernardino de Siena by Father Dumetz. The Guachama rancheria was located in present-day Bryn Mawr in San Bernardino County. (BFSA, 2021a, pp. 2.0-18 to 2.0-19)



These early colonization efforts were followed by the establishment of estancias at Puente (circa 1816) and San Bernardino (circa 1819) near Guachama. These efforts were soon mirrored by the Spaniards from Mission San Luis Rey, who in turn established a presence in what is now Lake Elsinore, Temecula, and Murrieta. The indigenous groups who occupied these lands were recruited by missionaries, converted, and put to work in the missions. Throughout this period, the Native American populations were decimated by introduced diseases, a drastic shift in diet resulting in poor nutrition, and social conflicts due to the introduction of an entirely new social order. (BFSA, 2021a, p. 2.0-19)

Mexico achieved independence from Spain in 1822 and became a federal republic in 1824. As a result, both Baja and Alta California became classified as territories. Shortly thereafter, the Mexican Republic sought to grant large tracts of private land to its citizens to begin to encourage immigration to California and to establish its presence in the region. Part of the establishment of power and control included the desecularization of the missions circa 1832. These same missions were also located on some of the most fertile land in California and, as a result, were considered highly valuable. The resulting land grants, known as “ranchos,” covered expansive portions of California and by 1846, more than 600 land grants had been issued by the Mexican government. Rancho Jurupa was the first rancho to be established and was issued to Juan Bandini in 1838. Although Bandini primarily resided in San Diego, Rancho Jurupa was located in what is now Riverside County. A review of Riverside County place names quickly illustrates that many of the ranchos in Riverside County lent their names to present-day locations, including Jurupa, El Rincon, La Sierra, El Sobrante de San Jacinto, La Laguna (Lake Elsinore), Santa Rosa, Temecula, Pauba, San Jacinto Nuevo y Potrero, and San Jacinto Viejo. As was typical of many ranchos, these were all located in the valley environments within western Riverside County. (BFSA, 2021a, p. 2.0-19)

The treatment of Native Americans grew worse during the Rancho Period. Most of the Native Americans were forced off of their land or put to work on the now privately-owned ranchos, most often as slave labor. In light of the brutal ranchos, the degree to which Native Americans had become dependent upon the mission system is evident when, in 1838, a group of Native Americans from Mission San Luis Rey petitioned government officials in San Diego to relieve suffering at the hands of the rancheros. (BFSA, 2021a, p. 2.0-19)

Native American culture had been disrupted to the point where they could no longer rely upon prehistoric subsistence and social patterns. Not only does this illustrate how dependent the Native Americans had become upon the missionaries, but it also indicates a marked contrast in the way the Spanish treated the Native Americans compared to the Mexican and United States ranchers. Spanish colonialism (missions) is based upon utilizing human resources while integrating them into their society. The Mexican and American ranchers did not accept Native Americans into their social order and used them specifically for the extraction of labor, resources, and profit. Rather than being incorporated, they were either subjugated or exterminated. (BFSA, 2021a, p. 2.0-20)

By 1846, tensions between the United States and Mexico had escalated to the point of war. In order to reach a peaceful agreement, the Treaty of Guadalupe Hidalgo was put into effect in 1848, which resulted in the annexation of California to the United States. Once California opened to the United States, waves of settlers moved in searching for gold mines, business opportunities, political opportunities, religious freedom, and



adventure. By 1850, California had become a state and was eventually divided into 27 separate counties. While a much larger population was now settling in California, this was primarily in the central valley, San Francisco, and the Gold Rush region of the Sierra Nevada mountain range. During this time, southern California grew at a much slower pace than northern California and was still dominated by the cattle industry established during the earlier rancho period. However, by 1859, the first United States Post Office in what would eventually become Riverside County was set up at John Magee's store on the Temecula Rancho. (BFSA, 2021a, p. 2.0-20)

During the same decade, circa 1852, the Native Americans of southern Riverside County, including the Luiseño and the Cahuilla, thought they had signed a treaty resulting in their ownership of all lands from Temecula to Aguanga east to the desert, including the San Jacinto Valley and the San Gorgonio Pass. The Temecula Treaty also included food and clothing provisions for the Native Americans. However, Congress never ratified these treaties, and the promise of one large reservation was rescinded. (BFSA, 2021a, p. 2.0-20)

With the completion of the Southern Pacific Railroad in 1869, southern California saw its first major population expansion. The population boom continued circa 1874 with the completion of connections between the Southern Pacific Railroad in Sacramento to the transcontinental Central Pacific Railroad in Los Angeles. The population influx brought farmers, land speculators, and prospective developers to the region. As the Jurupa area became more and more populated, circa 1870, Judge John Wesley North and a group of associates founded the city of Riverside on part of the former rancho. (BFSA, 2021a, p. 2.0-20)

Although the first orange trees were planted in Riverside County circa 1871, it was not until a few years later when a small number of Brazilian navel orange trees were established that the citrus industry truly began in the region. The Brazilian navel orange was well suited to the climate of Riverside County and thrived with assistance from several extensive irrigation projects. At the close of 1882, an estimated half a million citrus trees were present in California. It is estimated that nearly half of that population was in Riverside County. Population growth and 1880s tax revenue from the booming citrus industry prompted the official formation of Riverside County in 1893 out of portions of what was once San Bernardino County. (BFSA, 2021a, pp. 2.0-20 to 2.0-21)

Shortly thereafter, with the start of World War I, the United States began to develop a military presence in Riverside County with the construction of March Air Reserve Base. During World War II Camp Haan and Camp Anza were constructed in the what is now the current location of the National Veteran's Cemetery. In the decades that followed, populations spread throughout the county into Lake Elsinore, Corona, Norco, Murrieta, and Wildomar. However, a significant portion of the county remained largely agricultural well into the 1970s. Following the 1970s, Riverside saw a period of dramatic population increase as the result of new development, more than doubling the population of the county with a population of over 1.3 million residents. (BFSA, 2021a, p. 2.0-21)



B. Documented Prehistoric Resources

BFSA conducted a cultural resources survey to locate and record cultural resources within the Project site in compliance with CEQA and following the County of Riverside Cultural Resource Guidelines. BFSA also conducted the review of an archaeological records search conducted at the Eastern Information Center (EIC) at the University of California at Riverside (UCR) in order to assess previous archaeological studies and identify any previously-recorded sites within the project boundaries or in the immediate vicinity. A total of 26 cultural resources are recorded within a one-mile radius of the project, two of which (RIV-11,586 and RIV-11,587) are located within the Project site. In addition, a search of the Sacred Lands Files (SLFs) was requested from the Native American Heritage Commission (NAHC) to determine if any recorded Native American sacred sites or locations of religious or ceremonial importance are present within the project. (BFSA, 2021a, p. 1.0-1)

The Phase I archaeological survey of the project was conducted on June 17, 2020 under the direction of Principal Investigator Brian F. Smith and resulted in the relocation of two previously identified sites (RIV-11,586 and RIV-11,587) within the Project site. No new resources were encountered as a result of the intensive pedestrian survey conducted by BFSA. (BFSA, 2021a, p. 1.0-1) Refer to Section 3.0 of the Project's CRA (*Technical Appendix D*) for a description of the methodology used by BFSA to conduct the cultural resources investigation.

1. Archaeological Records Search Results

An archaeological records search for a one-mile radius around the Project site was conducted by the EIC at UCR, the results of which were reviewed by BFSA (refer to Appendix C to the Project's CRA, included as EIR *Technical Appendix D*). The EIC reported that 26 archaeological sites are recorded within the one-mile search radius (refer to Table 4.1-1 of the Project's CRA). Of the previously recorded resources, seven are prehistoric and consist of four lithic scatters, one occupation site, one bedrock milling site, and one isolate. The remaining 19 resources are historic and consist of a mine and kilns, a bridge, an ancillary building, four residences, the proposed Alberhill District, four trash scatters, a concrete pad and associated trash scatter, three water conveyance systems, two cisterns, and the old Santa Fe Railroad grade. Sites RIV-11,586 and RIV-11,587 are recorded within the Project boundaries. Both sites are characterized as historic trash scatters situated within drainages that bordered the former orchards on the higher elevated areas of the Project site. (BFSA, 2021a, p. 4.0-1)

The results of the EIC records search also indicate that 35 previous archaeological studies have been conducted within one mile of the Project site (see Table 4.1-2 in Appendix E of the Project's CRA, included as EIR *Technical Appendix D*), three of which overlap the Project boundaries. L&L Environmental, Inc. (L&L) conducted a study that included the entire Renaissance Ranch Project in support of the originally proposed residential subdivision of the property. L&L did not identify any resources on the property and found "that 70% of the study area had been disturbed, as a result of agricultural and other uses." However, visibility of the natural ground surface was limited during the survey and based upon their study, L&L found that there was a "moderate probability that prehistoric or historic resources will be impacted by continued development and



recommend archaeological monitoring during all brushing and earthmoving phases of the project.” (BFSA, 2021a, p. 4.0-2)

Both the Statistical Research, Inc. (SRI) and LSA studies were conducted in support of the Southern California Edison Valley-Ivyglen Transmission Line and only cross portions of the Project site. The SRI study did not identify any resources within the Project site but LSA identified the two historic trash scatters recorded as RIV-11,586 and RIV-11,587 within the Project site. LSA also noted an “unknown concrete feature” at CA-RIV-11,587 on the site form. (BFSA, 2021a, p. 4.0-2)

As part of the records search, the following historic sources were also reviewed:

- The National Register of Historic Places (NRHP) Index
- The Office of Historic Preservation (OHP), Archaeological Determinations of Eligibility
- The OHP, Built Environment Resources Directory (BERD)
- Bureau of Land Management (BLM) General Land Office (GLO) records
- 1901 Elsinore, California (30-minute), 1942 Lake Elsinore, California (15-minute), and 1955, 1967, and 1988 Alberhill, California (7.5-minute) United States Geologic Survey (USGS) quadrangle maps
- 1967 to 2016 aerial photographs

However, none of these sources identified any resources within the project. The GLO records indicate that the Project site was originally granted to the Southern Pacific Railroad in 1892 as part of a 71,268.54-acre grant (BLM Serial Number 072835). A series of orchards are visible on the flat mesa areas of the Project site in aerial photographs from the 1960s to the early 2000s. Between 1981 and 1994, a rural residential development is visible in the far northwest corner of the Project site along what is now Horsethief Canyon Road and cleared areas, structures, and new dirt access roads are visible from 1981 to 1994 within the orchards in the southern mesa. During the 1980s and 1990s, the surrounding Horsethief Canyon Ranch subdivision was being developed and Elmore Duck Club structures were present within the orchard area of the Project site. In the early 2000s, the orchards were removed, all structures within the Project site had been removed by 2006, and by 2009, only access roads are visible within the Project site. (BFSA, 2021a, p. 4.0-3)

The analysis of nearby site components and artifacts did not indicate Native American religious, ritual, or other special activities at this location. BFSA requested a SLF search by the NAHC to determine if any recorded Native American sacred sites or locations of religious or ceremonial importance are present within one mile of the project. The SLF search did not indicate the presence of any sacred sites or locations of religious or ceremonial importance within the search radius. In accordance with the recommendations of the NAHC, BFSA contacted all Native Americans listed in the NAHC response letter and has received four responses. The Santa Rosa Band of Cahuilla Indians has no response at this time and the Agua Caliente Band of Cahuilla Indians defers to other tribes in the area. Although the Cahuilla Band of Indians does not have any knowledge of any resources within or near the Project site, since the development is located within their traditional land use area, they have requested that Cahuilla tribal monitors be present during all Project-related, ground-disturbing activities. The Pala Band of Mission Indians requested to participate in the field survey with BFSA.



Subsequently, the survey was undertaken with the assistance of Squire Redfern, a Luiseño Native American representative from the Pala Indian Reservation. All correspondence is provided in Appendix D to the Project's CRA (*Technical Appendix D*). (BFSa, 2021a, p. 4.0-3)

2. Results of the Field Survey

BFSa conducted field surveys of the Project site on June 17, 2020. The archaeological survey of the property was an intensive reconnaissance consisting of a series of parallel survey transects spaced at approximately 10- to 15-meter intervals, except where steep slopes and dense vegetation prohibited systematic transects. (BFSa, 2021a, p. 4.0-3)

Generally, visibility throughout the property was poor due to dense ground cover. Vegetation found on the property primarily consisted of non-native weeds and grasses intermixed with pockets of sage scrub and chaparral vegetation communities throughout the higher elevations of the property. The sage scrub and chaparral communities were more prevalent leading into the steep canyons where previous agricultural use and clearing of the property has caused less disturbance. Riparian habitat was noted within the seasonal drainages found at the base of the canyons. (BFSa, 2021a, pp. 4.0-3 to 4.0-4)

Generally, the accessible portions of the Project site were found to have been highly impacted by previous development and subsequent clearing of the property. An angular rock wall, an associated concrete driveway, and large piles of modern refuse and discarded building materials were located within the northwestern portion of the Project site, all of which are associated with the development of the property between 1981 and 1994. However, these features do not meet the age threshold to be considered for eligibility as historic resources. (BFSa, 2021a, p. 4.0-4)

No new resources were identified during the survey but previously recorded sites RIV-11,586 and RIV-11,587 were relocated. Both sites appear similar as when recorded in 2013 by LSA. However, dense vegetation obscured much of both site areas and RIV-11,586 appears to have been impacted by more recent dumping of modern refuse and building materials. LSA also noted an "unknown concrete feature" at RIV-11,587 on the site form, which was relocated during the current survey. A review of the concrete feature at RIV-11,587 indicates that it is a wildlife guzzler or water catchment device designed to provide water to wildlife in the region and was likely used to attract game for members of the Elmore Duck Club in the 1980s/1990s. Due to its modern age, the feature cannot be associated with RIV-11,587. (BFSa, 2021a, p. 4.0-4)

Sites RIV-11,586 and RIV-11,587 have not previously been tested or previously evaluated for significance under CEQA. As a result, the sites were subjected to a subsurface testing and significance evaluation program. (BFSa, 2021a, p. 4.0-8)

3. Field Investigation

The following subsections provide the pertinent field results for the CEQA significance evaluations for the Renaissance Ranch Project. The testing program was conducted on February 3, 2021. The potential for



subsurface deposits was assessed through shovel test pit (STP) excavations at RIV-11,586 and RIV-11,587. (BFSA, 2021a, p. 4.0-8)

□ **Site RIV-11,586**

Site RIV-11,586 is located within the southwestern portion of the Project site along the banks of and within a seasonal drainage. Site RIV-11,586 was first identified in 2013 by LSA and recorded as a 315-by 50-foot trash scatter containing cans dating from post-World War II to the mid-1950s along with pipe, metal, glass, wood, and stove pipe fragments. However, the resource was not subjected to a CEQA significance evaluation at that time. (BFSA, 2021a, p. 4.0-8)

Prior to the initiation of subsurface excavations, all identified surface artifacts were mapped and recorded in detail using GPS equipment with sub-meter capability. The surface analysis resulted in the identification of 15 artifacts. Seven of the items are glass (46.67 percent), six are metal (40.00 percent), and two are ceramic (13.33 percent). All 15 artifacts were identifiable to various functional categories (Table 4.3–3) and were classified as kitchen items, consumer items, and building materials. (BFSA, 2021a, p. 4.0-8)

In order to more accurately date the surface artifacts recovered from RIV-11,586, only those items representing expendable consumer products were used in assigning a date range. Consumer expendables are useful for dating an assemblage because they represent items that are only used for a brief period and are then discarded. Although some recycling behaviors did occur historically, when several items are taken together as a group, a greater level of confidence can be achieved when examining date ranges and period of occupation. Upon review of the three temporally diagnostic artifacts, they may represent a single dumping episode that occurred between 1935 and 1960. (BFSA, 2021a, p. 4.0-8)

In order to determine if historic resources had been buried or masked within the mapped location of the resource, eight STPs were excavated to 30 centimeters across the site. No prehistoric or historic artifacts were recovered and no culturally modified soil was observed within the STPs. (BFSA, 2021a, p. 4.0-12)

The native soil across the site includes a moderately compact, brown, sandy silt ranging between zero and 30 centimeters in depth, which became more compacted in the lower levels with many of the STPs terminating in bedrock. Since no artifacts were recovered from the STPs and no culturally modified soil was observed, the results of the subsurface excavations indicate that there is no subsurface component to the site. (BFSA, 2021a, p. 4.0-13)

An analysis of the limited surface collection indicates that the majority of the site is composed of consumer and kitchen items likely representing a single dumping episode that occurred between 1935 and 1960. Based upon the surface data and the lack of subsurface materials, the site does not represent the level of focused historic activity that would correspond to a historic occupation site or multi-episodic refuse deposit. Instead, the site is classified as a transient, single episode refuse disposal site with no subsurface component and limited integrity. As a result of the current collection efforts and site analysis, the site exhibits no residual research potential. (BFSA, 2021a, p. 4.0-13)



□ **Site RIV-11,587**

Site RIV-11,587 is located within the farthest northeast portion of the former orchard within the Project site along the banks of and within a seasonal drainage. Site RIV-11,587 was first identified in 2013 LSA and recorded as a 70-by-70-foot trash scatter composed of early 1950s to late 1960s cans, glass bottles, and broken glass, metal, wood, and concrete. However, the resource was not subjected to a CEQA significance evaluation at that time. (BFSA, 2021a, p. 4.0-13)

Prior to the initiation of subsurface excavations, all identified surface artifacts were mapped and recorded in detail using GPS equipment with sub-meter capability. The surface analysis resulted in the identification of 21 artifacts. Seventeen of the items are glass (80.95 percent), three are metal (14.29 percent), and one is ceramic (4.76 percent). All 21 artifacts were identifiable to various functional categories and were primarily classified as consumer items, household items, and personal items. (BFSA, 2021a, p. 4.0-13)

In order to more accurately date the surface artifacts recovered from RIV-11,587, only those items representing expendable consumer, household, and personal products were used in assigning a date range. These types of expendables are useful for dating an assemblage because they represent items that are only used for a brief period and are then discarded. Although some recycling behaviors did occur historically, when several items are taken together as a group, a greater level of confidence can be achieved when examining date ranges and period of occupation. Upon review of the 15 temporally diagnostic artifacts, the majority likely date to the period between 1943 and 1947 with another isolated dumping event occurring circa 1953. (BFSA, 2021a, p. 4.0-16)

In order to determine if historic resources had been buried or masked within the mapped location of the resource, five STPs were excavated to 30 centimeters across the site. No prehistoric or historic artifacts were recovered and no culturally modified soil was observed within the STPs. (BFSA, 2021a, p. 4.0-17)

The native soil across the site includes a moderately compact, brown, sandy silt ranging between zero and 30 centimeters in depth, which became more compacted in the lower levels with many of the STPs terminating in bedrock. Since no artifacts were recovered and no culturally modified soil was observed, the results of the subsurface excavations indicate that there is no subsurface component to the site. (BFSA, 2021a, p. 4.0-17)

An analysis of the limited surface collection indicates that the majority of the site is composed of consumer items and the artifacts likely date to the period between 1943 and 1947 with another isolated dumping event occurring circa 1953. Based upon the surface data and the lack of subsurface materials, the site does not represent the level of focused historic activity that would correspond to a historic occupation site or multi-episodic refuse deposit. Instead, the site is classified as a transient, single episode refuse disposal site with no subsurface component and limited integrity. As a result of the current collection efforts and site analysis, the site exhibits no residual research potential. (BFSA, 2021a, p. 4.0-18)



Discussion Summary

The investigation of RIV-11,586 and RIV-11,587 identified surface artifacts at both sites with no subsurface deposits. The cultural materials recovered from the sites indicate that both RIV-11,586 and RIV-11,587 likely represent transient, single episode refuse dumping locations used between the mid-1930s and 1960. The materials recovered from both sites may have been deposited during the historic use of the property as an orchard. The collection of all surface artifacts and the subsequent reporting herein have exhausted the research potential of the sites. The archaeological sites were evaluated as not significant and ineligible for listing on the California Register of Historical Resources (CRHR). (BFSA, 2021a, pp. 4.0-18 and 5.0-1)

4.5.2 APPLICABLE ENVIRONMENTAL REGULATIONS

The following is a brief description of the federal, State, and local environmental laws and related regulations governing the protection of cultural resources.

A. Federal Regulations

1. National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) was passed primarily to acknowledge the importance of protecting our nation's heritage. While Congress recognized that national goals for historic preservation could best be achieved by supporting the drive, enthusiasm, and wishes of local citizens and communities, it understood that the federal government must set an example through enlightened policies and practices. In the words of the Act, the federal government's role would be to "provide leadership" for preservation, "contribute to" and "give maximum encouragement" to preservation, and "foster conditions under which our modern society and our prehistoric and historic resources can exist in productive harmony." (NPS, n.d.)

NHPA and related legislation sought a partnership among the federal government and the states that would capitalize on the strengths of each. The federal government, led by the National Park Service (NPS) provides funding assistance; basic technical knowledge and tools; and a broad national perspective on America's heritage. The states, through State Historic Preservation Officers (SHPOs) appointed by the governor of each state, would provide matching funds, a designated state office, and a statewide preservation program tailored to state and local needs and designed to support and promote state and local historic preservation interests and priorities. (NPS, n.d.)

An Advisory Council on Historic Preservation, the first and only federal entity created solely to address historic preservation issues, was established as a cabinet-level body of Presidentially-appointed citizens, experts in the field, and federal, state, and local government representatives, to ensure that private citizens, local communities, and other concerned parties would have a forum for influencing federal policy, programs, and decisions as they impacted historic properties and their attendant values. (NPS, n.d.)

Section 106 of NHPA granted legal status to historic preservation in federal planning, decision-making, and project execution. Section 106 requires all federal agencies to take into account the effects of their actions on



historic properties, and provide ACHP with a reasonable opportunity to comment on those actions and the manner in which federal agencies are taking historic properties into account in their decisions. (NPS, n.d.)

A number of additional executive and legislative actions have been directed toward improving the ways in which all federal agencies manage historic properties and consider historic and cultural values in their planning and assistance. Executive Order 11593 (1971) and, later, Section 110 of NHPA (1980, amended 1992), provided the broadest of these mandates, giving federal agencies clear direction to identify and consider historic properties in federal and federally assisted actions. The National Historic Preservation Amendments of 1992 further clarified Section 110 and directed federal agencies to establish preservation programs commensurate with their missions and the effects of their authorized programs on historic properties. (NPS, n.d.)

2. *National Register of Historic Places (NRHP)*

The National Register of Historic Places is the official list of the Nation's historic places worthy of preservation. Authorized by the National Historic Preservation Act of 1966, the NPS's National Register of Historic Places (NRHP) is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archeological resources. (NPS, 2020)

To be considered eligible, a property must meet the National Register Criteria for Evaluation. This involves examining the property's age, integrity, and significance, as follows:

- **Age and Integrity.** Is the property old enough to be considered historic (generally at least 50 years old) and does it still look much the way it did in the past?
- **Significance.** Is the property associated with events, activities, or developments that were important in the past? With the lives of people who were important in the past? With significant architectural history, landscape history, or engineering achievements? Does it have the potential to yield information through archeological investigation about our past? (NPS, 2020)

Nominations can be submitted to a SHPO from property owners, historical societies, preservation organizations, governmental agencies, and other individuals or groups. The SHPO notifies affected property owners and local governments and solicits public comment. If the owner (or a majority of owners for a district nomination) objects, the property cannot be listed but may be forwarded to the National Park Service (NPS) for a Determination of Eligibility (DOE). Listing in the National Register of Historic Places provides formal recognition of a property's historical, architectural, or archeological significance based on national standards used by every state. (NPS, 2020)

Under Federal Law, the listing of a property in the National Register places no restrictions on what a non-federal owner may do with their property up to and including destruction, unless the property is involved in a project that receives Federal assistance, usually funding or licensing/permitting. National Register listing does not lead to public acquisition or require public access. (NPS, 2020)



3. *National Historic Landmarks Program*

National Historic Landmarks (NHLs) are nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the United States. Today, just over 2,500 historic places bear this national distinction. Working with citizens throughout the nation, the National Historic Landmarks Program draws upon the expertise of National Park Service staff who guide the nomination process for new Landmarks and provide assistance to existing Landmarks. (NPS, 2021)

4. *American Indian Religious Freedom Act*

The American Indian Religious Freedom Act (AIRFA) requires each executive branch agency with statutory or administrative responsibility for the management of Federal lands shall, to the extent practicable, permitted by law, and not clearly inconsistent with essential agency functions, to accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners and avoid adversely affecting the physical integrity of such sacred sites. Where appropriate, agencies also are required to maintain the confidentiality of sacred sites. Each executive branch agency with statutory or administrative responsibility for the management of Federal lands are required to implement procedures to ensure reasonable notice is provided of proposed actions or land management policies that may restrict future access to or ceremonial use of, or adversely affect the physical integrity of, sacred sites. (NOAA, n.d.)

5. *Native American Graves Protection and Repatriation Act (NAGPRA)*

The Native American Graves Protection and Repatriation Act (NAGPRA; Public Law 101-601; 25 U.S.C. 3001-3013) describes the rights of Native American lineal descendants, Indian tribes, and Native Hawaiian organizations with respect to the treatment, repatriation, and disposition of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony, referred to collectively in the statute as cultural items, with which they can show a relationship of lineal descent or cultural affiliation. (NPS, n.d.)

One major purpose of this statute is to require that federal agencies and museums receiving Federal funds inventory holdings of Native American human remains and funerary objects and provide written summaries of other cultural items. The agencies and museums must consult with Indian Tribes and Native Hawaiian organizations to attempt to reach agreements on the repatriation or other disposition of these remains and objects. Once lineal descent or cultural affiliation has been established, and in some cases the right of possession also has been demonstrated, lineal descendants, affiliated Indian Tribes, or affiliated Native Hawaiian organizations normally make the final determination about the disposition of cultural items. Disposition may take many forms from reburial to long term curation, according to the wishes of the lineal descendent(s) or culturally affiliated Tribe(s). (NPS, n.d.)

The second major purpose of the statute is to provide greater protection for Native American burial sites and more careful control over the removal of Native American human remains, funerary objects, sacred objects, and items of cultural patrimony on Federal and tribal lands. NAGPRA requires that Indian tribes or Native Hawaiian organizations be consulted whenever archeological investigations encounter, or are expected to



encounter, Native American cultural items or when such items are unexpectedly discovered on Federal or tribal lands. Excavation or removal of any such items also must be done under procedures required by the Archaeological Resources Protection Act. This NAGPRA requirement is likely to encourage the in-situ preservation of archaeological sites, or at least the portions of them that contain burials or other kinds of cultural items. (NPS, n.d.)

Other provisions of NAGPRA: (1) stipulate that illegal trafficking in human remains and cultural items may result in criminal penalties; (2) authorizes the Secretary of the Interior to administer a grants program to assist museums and Indian Tribes in complying with certain requirements of the statute; (3) requires the Secretary of the Interior to establish a Review Committee to provide advice and assistance in carrying out key provisions of the statute; authorizes the Secretary of the Interior to penalize museums that fail to comply with the statute; and, (5) directs the Secretary to develop regulations in consultation with this Review Committee. (NPS, n.d.)

6. Federal Antiquities Act

The Antiquities Act is the first law to establish that archeological sites on public lands are important public resources. It obligates federal agencies that manage the public lands to preserve for present and future generations the historic, scientific, commemorative, and cultural values of the archaeological and historic sites and structures on these lands. It also authorizes the President to protect landmarks, structures, and objects of historic or scientific interest by designating them as National Monuments. (NPS, n.d.)

B. State Regulations

1. California Administrative Code, Title 14, Section 4308

Section 4308, *Archaeological Features*, of Title 14 of the California Administrative Code provides that: “No person shall remove, injure, disfigure, deface, or destroy any object of archaeological, or historical interest or value.” (NPS, n.d.)

2. California Code of Regulations Title 14, Section 1427

California Code of Regulations Title 14, Section 1427 provides that: “No person shall collect or remove any object or thing of archeological or historical interest or value, nor shall any person injure, disfigure, deface or destroy the physical site, location or context in which the object or thing of archeological or historical interest or value is found.” (NAHC, n.d.)

3. California Register of Historic Resources

The State Historical Resources Commission has designed this program for use by state and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The Register is the authoritative guide to the state's significant historical and archeological resources. The California Register program encourages public recognition and protection of resources of architectural, historical, archeological, and cultural significance; identifies historical resources for state and local planning



purposes; determines eligibility for state historic preservation grant funding; and affords certain protections under CEQA. (OHP, n.d.)

In order for a resource to be included on the Register of Historic Resources, the resources must meet one of the following criteria:

- Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States (Criterion 1).
- Associated with the lives of persons important to local, California or national history (Criterion 2).
- Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values (Criterion 3).
- Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation (Criterion 4). (OHP, n.d.)

For resources included on the Register of Historic Resources, environmental review may be required under CEQA if property is threatened by a project. Additionally, local building inspectors must grant code alternatives provided under State Historical Building Code. Further, the local assessor may enter into contract with property owner for property tax reduction pursuant to the Mills Act. A property owner also may place his or her own plaque or marker at the site of the resource. (OHP, n.d.)

Consent of owner is not required, but a resource cannot be listed over an owner's objections. The State Historical Resources Commission (SHRC) can, however, formally determine a property eligible for the California Register if the resource owner objects. (OHP, n.d.)

4. *Traditional Tribal Cultural Places Act (Senate Bill 18, "SB 18")*

Senate Bill 18 (SB 18) requires local (city and county) governments to consult with California Native American tribes to aid in the protection of traditional tribal cultural places ("cultural places") through local land use planning. SB 18 also requires the Governor's Office of Planning and Research (OPR) to include in the General Plan Guidelines advice to local governments for how to conduct these consultations. (OPR, 2005)

The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places. The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level land use decisions are made by a local government. (OPR, 2005)

SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to adoption and amendment of both general plans (defined in Government Code § 65300 et seq.) and specific plans (defined in Government Code § 65450 et seq.). Although SB 18 does not specifically mention consultation or notice requirements for adoption or amendment of specific plans, existing state



planning law requires local governments to use the same processes for adoption and amendment of specific plans as for general plans (see Government Code § 65453). Therefore, where SB 18 requires consultation and/or notice for a general plan adoption or amendment, the requirement extends also to a specific plan adoption or amendment. (OPR, 2005)

5. **Assembly Bill 52 (AB 52)**

California Assembly Bill 52 (AB 52) (2014) Chapter 532 amended Section 5097.94 of, and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21802.3, 21083.09, 21084.2 and 21084.3 to the California Public Resources Code, relating to Native Americans. AB 52 was approved on September 25, 2014. By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process. (OPR, 2017a)

The Public Resources Code now establishes that “[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.” (Pub. Resources Code, § 21084.2.) To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. (Pub. Resources Code, § 21080.3.1.) (OPR, 2017a)

If a lead agency determines that a project may cause a substantial adverse change to tribal cultural resources, the lead agency must consider measures to mitigate that impact. Public Resources Code § 20184.3 (b)(2) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources. These rules apply to projects that have a notice of preparation for an environmental impact report or negative declaration or mitigated negative declaration filed on or after July 1, 2015. (OPR, 2017a)

§ 21074 of the Public Resources Code defines “tribal cultural resources.” In brief, in order to be considered a “tribal cultural resource,” a resource must be either:

- (1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or
- (2) a resource that the lead agency chooses, in its discretion, to treat as a tribal cultural resource. (OPR, 2017a)



In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources. In applying those criteria, a lead agency must consider the value of the resource to the tribe. (OPR, 2017a)

6. State Health and Safety Code

California Health and Safety Code (HSC) § 7050.5(b) requires that excavation and disturbance activities must cease “In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery...” until the coroner can determine regarding the circumstances, manner, and cause of any death. The coroner is then required to make recommendations concerning the treatment and disposition of the human remains. Further, this section of the code makes it a misdemeanor to intentionally disturb, mutilate or remove interred human remains. § 7051 specifies that the removal of human remains from “internment or a place of storage while awaiting internment” with the intent to sell them or to dissect them with “malice or wantonness” is a public offense punishable by imprisonment in a state prison. Lastly, HSC §§ 8010-8011 establish the California Native American Graves Protection and Repatriation Act consistent with the federal law addressing the same. The Act stresses that “all California Indian human remains and cultural items are to be treated with dignity and respect.” It encourages voluntary disclosure and return of remains and cultural items by publicly funded agencies and museums in California. It also outlines the need for aiding California Indian tribes, including non-federally recognized tribes, in filing repatriation claims. (CA Legislative Info, n.d.)

7. California Code of Regulations Section 15064.5

The California Code of Regulations, Title 14, Chapter 3, § 15064.5 (the State CEQA Guidelines) establishes the procedure for determining the significance of impacts to archeological and historical resources, as well as classifying the type of resource. Cultural resources are aspects of the environment that require identification and assessment for potential significance. The evaluation of cultural resources under CEQA is based upon the definitions of resources provided in State CEQA Guidelines § 15064.5, as follows:

- *A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4850 et seq.).*
- *A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.*
- *Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to*



be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852) including the following:

- *Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;*
- *Is associated with the lives of persons important in our past;*
- *Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or*
- *Has yielded, or may be likely to yield, information important in prehistory or history.*
- *The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.*

4.5.3 BASIS FOR DETERMINING SIGNIFICANCE

Section V of Appendix G to the State CEQA Guidelines addresses typical adverse effects to cultural resources, and includes the following threshold questions to evaluate the Project’s impacts on cultural resources (OPR, 2018a):

- Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?
- Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?
- Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Significance thresholds set forth in the Riverside County’s Environmental Assessment Checklist form, are derived from Section V of Appendix G to the State CEQA Guidelines (listed above), as modified by the 2018 updates to the State CEQA Guidelines, and state that the proposed Project would have a significant impact on cultural resources if construction and/or operation of the Project would:

- a. *Alter or destroy an historic site;*
- b. *Cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations, § 15064.5;*
- c. *Alter or destroy an archaeological site;*



- d. Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, § 15064.5; or
- e. Disturb any human remains, including those interred outside of formal cemeteries.

The significance thresholds set forth in the Riverside County’s Environmental Assessment Checklist form, as modified by the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project’s impacts on cultural resources.

4.5.4 IMPACT ANALYSIS

Threshold a.: Would the Project alter or destroy an historic site?

Threshold b.: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to California Code of Regulations, Section 15064.5?

Under existing conditions, the Project site is undeveloped and there are no structures located on-site. Based on the results of the Project’s CRA (*Technical Appendix D*), the Project site includes two potentially historical sites (RIV-11,586 and RIV-11,587). However, the investigation of RIV-11,586 and RIV-11,587 identified surface artifacts at both sites with no subsurface deposits. The cultural materials recovered from the sites indicate that both RIV-11,586 and RIV-11,587 likely represent transient, single episode refuse dumping locations used between the mid-1930s and 1960. The materials recovered from both sites may have been deposited during the historic use of the property as an orchard. The collection of all surface artifacts and the subsequent reporting herein have exhausted the research potential of the sites. The archaeological sites were evaluated as not significant and ineligible for listing on the CRHR. There are no other historical resources present on the Project site. However, there is a possibility that historical resources may be present beneath the site’s surface and may be impacted by future ground-disturbing construction activities associated with the Project. Pursuant to California Code of Regulations, § 15064.5, this is a potentially significant impact for which mitigation would be required.

Threshold c.: Would the Project alter or destroy an archaeological site?

Threshold d.: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations, Section 15064.5?

Based on the results of the Project’s CRA (*Technical Appendix D*), the Project site does not contain any known archaeological resources as defined by Section 15064.5 of the California Code of Regulations. As such, the Project would not result in any impacts to any known archaeological sites or archaeological resources. However, there is a possibility that archaeological resources may be present beneath the site’s subsurface and may be impacted by future ground-disturbing construction activities associated with the Project. Due to the potential to discover significant archaeological resources within the Project boundaries, which could be significantly impacted if not properly identified and treated, a potentially significant impact to subsurface archaeological resources would occur, and mitigation would be required.



Threshold e.: Would the Project disturb any human remains, including those interred outside of formal cemeteries?

The Project site does not contain a cemetery and no known cemeteries are located within the immediate site vicinity. Field surveys conducted on the Project site by BFSA did not identify the presence of any human remains and no human remains are known to exist beneath the surface of the site. Nevertheless, the remote potential exists that human remains may be unearthed during grading and excavation activities associated with Project construction.

If human remains are unearthed during Project construction, the construction contractor would be required by law to comply with California Health and Safety Code, § 7050.5, “Disturbance of Human Remains.” According to § 7050.5(b) and (c), if human remains are discovered, the County Coroner must be contacted and if the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, the Coroner is required to contact the Native American Heritage Commission (NAHC) by telephone within 24 hours. Pursuant to California Public Resources Code § 5097.98, whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to Public Resources Code § 5097.94(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials. Notwithstanding the requirements of California Health and Safety Code § 7050.5 and California Public Resources Code § 5097.98, due to the potential to discover buried human remains during Project construction activities (i.e., grading), a potentially significant impact would occur and mitigation would be required.

4.5.5 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development within western Riverside County. This study area was selected for evaluation because it encompasses a broad region with similar geological, biological, and climatic conditions.

As noted above under Thresholds a. and b., the investigation of RIV-11,586 and RIV-11,587 determined that these sites are not significant and are ineligible for listing on the CRHR. There are no other known historical resources present on the Project site. However, there is a possibility that subsurface historical resources may be impacted by development of the Project as proposed. Other developments envisioned with buildout of the Riverside County General Plan and the general plans of cities within the County also have the potential to result in impacts to historical sites or resources, including sites or resources that may be buried beneath the



ground surface. As such, the Project's potential impacts to previously-discovered historical resources on the Project site would be cumulatively considerable prior to mitigation.

As discussed under the analysis of Thresholds c. and d., the Project's CRA (*Technical Appendix D*) did not identify any potentially significant archaeological resources or sites within the Project site. As such, the Project would not result in any cumulatively-considerable impacts to previously identified archaeological resources or sites. However, there is a possibility that previously-undiscovered subsurface archaeological resources may be impacted by development of the Project as proposed. Other cumulative developments resulting from buildout of the Riverside County General Plan and the general plans of cities within the County also have the potential to result in impacts to archaeological sites or resources, including sites or resources that may be buried beneath the ground surface. As such, the Project's potential impacts to previously-undiscovered archaeological sites or resources would be cumulatively considerable prior to mitigation.

As discussed under Threshold e., although the Project would be subject to compliance with the provisions of California Health and Safety Code § 7050.5 as well as Public Resources Code § 5097 et. seq., there is a potential that buried human remains could be uncovered during construction of the proposed Project. Other cumulative developments similarly would have the potential to uncover buried human remains. Accordingly, the Project's potential impacts to human remains would be cumulatively considerable prior to mitigation.

4.5.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Thresholds a. & b.: Significant Direct and Cumulatively-Considerable Impact. Although no significant historical resources, as defined by the CRHR and CEQA, were identified as part of the Project's CRA, there is a potential for previously-undiscovered historical resources to occur on the site surface or beneath the surface of areas planned for physical impact (i.e., grading) as part of the Project. Potential impacts to previously-undiscovered historical resources on site or within the off-site improvement areas would be significant on both a direct and cumulatively-considerable basis prior to mitigation.

Threshold c. & d.: Significant Direct and Cumulatively-Considerable Impact. Based on the results of the Project's CRA, the Project site does not contain any known archaeological sites or resources. Notwithstanding, there is a possibility that previously-undiscovered subsurface archaeological resources may be impacted by development of the Project as proposed. Therefore, Project impacts to previously-undiscovered archaeological resources would be significant prior to mitigation.

Threshold e.: Significant Direct and Cumulatively-Considerable Impact. The Project site does not contain a cemetery and no known cemeteries are located within the immediate site vicinity. Although the Project Applicant would be required to comply with the applicable provisions of California Health and Safety Code § 7050.5 and California Public Resources Code § 5097 et. seq., the Project's potential impacts to buried human remains would be significant on a direct and cumulatively-considerable basis prior to mitigation.



4.5.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- Unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code Section 6254 (r), parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 6254 (r).

Mitigation

MM 4.5-1 The applicant/developer shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring Program (CRMP). A CRMP shall be developed in coordination with the consulting tribe(s) that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural, tribal cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. A fully executed copy of the contract and a digitally-signed copy of the agreement shall be provided to the County Archaeologist to ensure compliance with this condition of approval. Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The Project Archaeologist may submit a detailed letter to the County of Riverside during grading requesting a modification to the monitoring program if circumstances are encountered that reduce the need for monitoring.

MM 4.5-2 Prior to the issuance of a grading permit, the Project Applicant shall enter into a monitoring agreement with a Native American Monitor. A Native American Monitor shall be on-site during all initial ground disturbing activities in previously undisturbed soil. In conjunction with the Project Archeologist, the Native American Monitor shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The Project Applicant shall submit a fully executed copy of the agreement to the Riverside County Planning Department to ensure compliance with this condition.



- MM 4.5-3 Prior to the issuance of a grading permit, the Project Applicant or construction contractor shall provide evidence to Riverside County that the construction site supervisors and crew members involved with grading operations are trained during a mandatory pre-grading meeting by the Project Archaeologist and Native American Monitor to recognize archaeological or historical resources should such resources be unearthed during ground-disturbing construction activities. Training shall include a brief review of cultural sensitivity of the Project and surrounding area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols as determined by the County-approved Project Archaeologist. If a suspected archaeological or historical resource is identified on the property, the construction supervisor shall be required by contract to immediately halt and redirect grading operations in a 60-foot radius around the find and seek identification and evaluation of the suspected resource by the Project Archaeologist. This requirement shall be noted on all grading plans and the construction contractor shall be obligated to comply with the note. The Project Archaeologist shall evaluate the suspected resource and make a determination of significance pursuant to California Public Resources Code Section 21083.2.
- MM 4.5-4 During the original cutting of previously-undisturbed deposits, the archaeological monitor(s) and tribal representative shall be on-site, as determined by the Project Archaeologist, to perform periodic inspections of the excavations. The frequency of inspections will depend upon the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The Project Archaeologist shall have the authority to modify the monitoring program if the potential for cultural resources appears to be less than anticipated.
- MM 4.5-5 In the event that previously unidentified archaeological or historical resources are discovered, the Project Archaeologist shall have the authority to divert or temporarily halt ground disturbance operation within 100 feet of the area of discovery to allow for the evaluation of potentially significant cultural resources. The Project Archaeologist shall contact the Lead Agency (Riverside County) at the time of discovery. The Project Archaeologist, in consultation with the County Archaeologist and Native American Monitor, shall determine the significance of the discovered resources. The Lead Agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the Project Archaeologist in consultation with the Native American Monitor and approved by the Lead Agency before being carried out using professional archaeological methods. If any human bones are discovered, the county coroner and lead agency shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains. Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional



archaeological methods. The Project Archaeologist shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to Riverside County upon the completion of a treatment plan and final report detailing the significance and treatment finding.

- MM 4.5-6 If any cultural or historical material is discovered on the property, all cultural and/or historical material collected during the grading monitoring program shall be processed and curated according to the current professional repository standards and the Project Applicant shall relinquish ownership of all cultural resources (with the exception of sacred items, burial goods, and Human Remains), including all archaeological and historical artifacts and non-human remains, as part of the required mitigation for impacts to cultural and historical resources. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation, or the artifacts may be delivered to the Native American representative if that is recommended by Riverside County. Evidence of compliance with this mitigation measure shall be provided to the Riverside County Planning Department in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.
- MM 4.5-7 Prior to final grading inspection, in the event any resources are found on-site during construction activities, a final report documenting the field and analysis results, and interpreting the artifact and research data within the research context, shall be completed and submitted to the satisfaction of Riverside County. The report will include (at a minimum) the following: a discussion of the monitoring methods and techniques used; the results of the monitoring program including any artifacts recovered; an inventory of any resources recovered; updated Department of Parks and Recreation Primary and Archaeological Site Forms for any new resources identified, and all sites affected by the development; final disposition of the resources including GPS data; artifact catalog; and any additional recommendations as may be determined by Riverside County. A final copy shall be submitted to the Riverside County Planning Department, the Project Applicant, the Eastern Information Center, and the affected Tribe (if Native American resources are uncovered).
- MM 4.5-8 In the event that human remains are discovered, pursuant to California Health and Safety Code § 7050.5, as well as the Public Resources Code § 5097 et. seq., the Project Archaeologist shall have the authority to divert or temporarily halt ground disturbance operation within 100 feet the area of discovery to allow for the evaluation of the human remains and the surrounding vicinity. If any human remains are discovered, the County Coroner and lead agency shall be contacted. The County Coroner shall determine that no investigation of the cause of death is required, and determine if the remains are of Native American origin. In the event that the remains are determined to be of Native American origin, the NAHC shall be contacted within



24 hours of the discovery. The Most Likely Descendant, as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains. If the NAHC is unable to identify a Most Likely Descendant, or if the Most Likely Descendant failed to make a recommendation within 48 hours after being notified by the NAHC, or the Project Applicant rejects the recommendation of the Most Likely Descendant; the Project Applicant shall rebury the Native American human remains and associated grave goods on the property in a location not subject to further ground disturbance. Evidence of compliance with this mitigation measure, if human remains are found, shall be provided to Riverside County upon the completion of a treatment plan and final report detailing the significance and treatment finding.

4.5.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Thresholds a. & b.: Less-than-Significant Impact with Mitigation. Implementation of the Project has the potential to uncover previously-unknown historical resources. Implementation of Mitigation Measures MM 4.5-1 through MM 4.5-7 would ensure that a Project Archaeologist would be present during ground-disturbing activities, and would ensure that any significant historical resources that may be uncovered are appropriately treated as recommended by the Project Archaeologist. With implementation of the required mitigation, impacts would be reduced to less-than-significant levels.

Thresholds c. & d.: Less-than-Significant Impact with Mitigation. Mitigation Measures MM 4.5-1 through MM 4.5-7 would ensure that any previously-undiscovered archaeological sites or resources identified on site or within the off-site improvement areas during ground-disturbing activities are appropriately treated as directed by the Project Archaeologist, County Archaeologist, and Native American Monitor. Implementation of the required mitigation would reduce the Project's potential impacts to previously-undiscovered subsurface archaeological sites or resources to below a level of significance.

Threshold e.: Less-than-Significant Impact with Mitigation. In the event that human remains are discovered during construction activities, Mitigation Measure MM 4.5-8 would require the Project Applicant to comply with the applicable provisions of California Health and Safety Code § 7050.5 and California Public Resources Code § 5097 et. seq. Mandatory compliance with Mitigation Measure MM 4.5-8, State law, and applicable regulatory requirements would reduce the Project's potential impacts to buried human remains to less-than-significant-levels.



4.6 ENERGY

This Subsection is based in part on the information contained in the Project's Energy Analysis Report ("Energy Analysis"), titled "Renaissance Ranch Specific Plan Energy Analysis," dated March 26, 2021, and appended to this EIR as *Technical Appendix E* (Urban Crossroads, 2021a). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.6.1 EXISTING CONDITIONS

A. Overview

The most recent data for California's estimated total energy consumption is from 2018, released by the United States (U.S.) Energy Information Administration's (EIA) California State Profile and Energy Estimates included (Urban Crossroads, 2021a, p. 7):

- Approximately 7,900 trillion British Thermal Unit (BTU) of energy was consumed;
- Approximately 3,444 trillion BTU of petroleum;
- Approximately 2,210 trillion BTU of natural gas; and
- Approximately 33.3 trillion BTU coal.

The California Energy Commission's (CEC) Transportation Energy Demand Forecast 2018-2030 was released in order to support the 2017 Integrated Energy Policy Report. The Transportation energy Demand Forecast 2018-2030 lays out graphs and data supporting their projections of California's future transportation energy demand. The projected inputs consider expected variable changes in fuel prices, income, population, and other variables. Predictions regarding fuel demand included: (Urban Crossroads, 2021a, p. 7)

- Gasoline demand in the transportation sector is expected to decline from approximately 15.8 billion gallons in 2017 to between 12.3 billion and 12.7 billion gallons in 2030.
- Diesel demand in the transportation sector is expected to rise, increasing from approximately 3.7 billion diesel gallons in 2015 to approximately 4.7 billion in 2030.
 - Data from the Department of Energy states that approximately 3.9 billion gallons of diesel fuel were consumed in 2017.

The most recent data provided by the EIA for energy use in California by demand sector is from 2018 and is reported as follows (Urban Crossroads, 2021a, p. 7):

- Approximately 39.1% transportation;
- Approximately 23.5% industrial;
- Approximately 18.3% residential; and
- Approximately 19.2% commercial.



In 2020, total system electric generation for California was 277,704 gigawatt hours (GWh). California's massive electricity in-state generation system generated approximately 200,475 GWh which accounted for approximately 72.2% of the electricity it uses; the rest was imported from the Pacific Northwest (8.6%) and the U.S. Southwest (19.2%). Natural gas is the main source for electricity generation at 34.23% of the total in-state electric generation system power as shown in Table 4.6-1, *Total Electricity System Power (California 2020)*. Renewables account for 31.7% of the total electrical system power. (Urban Crossroads, 2021a, p. 7)

Table 4.6-1 Total Electricity System Power (California 2020)

Fuel Type	California In-State Generation (GWh)	Percent of California In-State Generation	Northwest Imports (GWh)	Southwest Imports (GWh)	Total California Energy Mix (GWh)	Total California Power Mix
Coal	248	0.12%	219	7,765	8,233	2.96%
Natural Gas	86,136	42.97%	62	8,859	95,057	34.23%
Oil	36	0.02%	0	0	36	0.01%
Other	411	0.20%	0	11	422	0.15%
Nuclear	16,163	8.06%	39	8,743	24,945	8.98%
Large Hydro	33,145	16.53%	6,387	1,071	40,603	14.62%
Unspecified	0	0.00%	6,609	13,767	20,376	7.34%
Non-Renewables and Unspecified Totals	136,139	67.91%	13,315	40,218	189,672	68.30%
Biomass	5,851	2.92%	903	33	6,787	2.44%
Geothermal	10,943	5.46%	99	2,218	13,260	4.77%
Small Hydro	5,349	2.67%	292	4	5,646	2.03%
Solar	28,513	14.22%	282	5,295	34,090	12.28%
Wind	13,680	6.82%	9,038	5,531	28,249	10.17%
Renewables Totals	64,336	32.09%	10,615	13,081	88,032	31.70%
Total	200,475	100.00%	23,930	53,299	277,704	100.00%

Source: https://www.energy.ca.gov/almanac/electricity_data/total_system_power.html
 (Urban Crossroads, 2021a, Table 2-1)

An updated summary of, and context for energy consumption and energy demands within the State is presented in “U.S. Energy Information Administration, California State Profile and Energy Estimates, Quick Facts” excerpted below (Urban Crossroads, 2021a, p. 8):

- California was the seventh-largest producer of crude oil among the 50 states in 2018, and, as of January 2019, it ranked third in oil refining capacity.
- California is the largest consumer of jet fuel among the 50 states and accounted for one-fifth of the nation’s jet fuel consumption in 2018.



- California's total energy consumption is second highest in the nation, but, in 2018, the state's per capita energy consumption was the fourth-lowest, due in part to its mild climate and its energy efficiency programs.
- In 2018, California ranked first in the nation as a producer of electricity from solar, geothermal, and biomass resources and fourth in the nation in conventional hydroelectric power generation.
- In 2018, large- and small-scale solar photovoltaic (PV) and solar thermal installations provided 19% of California's net electricity generation.

As indicated above, California is one of the nation's leading energy-producing states, and California's per capita energy use is among the nation's most efficient. Given the nature of the Project, the remainder of this discussion will focus on the three sources of energy that are most relevant to the project – namely, electricity, natural gas, and transportation fuel for vehicle trips associated with the uses planned for the Project. (Urban Crossroads, 2021a, pp. 8-9)

B. Electricity

The usage associated with electricity use were calculated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2. The Southern California region's electricity reliability has been of concern for the past several years due to the planned retirement of aging facilities that depend upon once-through cooling technologies, as well as the June 2013 retirement of the San Onofre Nuclear Generating Station (SONGS). While the once-through cooling phase-out has been ongoing since the May 2010 adoption of the State Water Resources Control Board's once-through cooling policy, the retirement of SONGS complicated the situation. California Independent System Operator (ISO) studies revealed the extent to which the South California Air Basin (SCAB) and the San Diego Air Basin (SDAB) region were vulnerable to low-voltage and post-transient voltage instability concerns. A preliminary plan to address these issues was detailed in the 2013 Integrative Energy Policy Report (IEPR) after a collaborative process with other energy agencies, utilities, and air districts. Similarly, the subsequent 2018 and 2019 IEPR's identify broad strategies that are aimed at maintaining electricity system reliability. (Urban Crossroads, 2021a, p. 9)

Electricity is provided to the Project area by Southern California Edison (SCE). SCE provides electric power to more than 15 million persons in 15 counties and in 180 incorporated cities, within a service area encompassing approximately 50,000 square miles. Based on SCE's 2018 Power Content Label Mix, SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-state suppliers. (Urban Crossroads, 2021a, p. 9)

California's electricity industry is an organization of traditional utilities, private generating companies, and state agencies, each with a variety of roles and responsibilities to ensure that electrical power is provided to consumers. The California ISO is a nonprofit public benefit corporation and is the impartial operator of the State's wholesale power grid and is charged with maintaining grid reliability, and to direct uninterrupted electrical energy supplies to California's homes and communities. While utilities [such as SCE] still own



transmission assets, the ISO routes electrical power along these assets, maximizing the use of the transmission system and its power generation resources. The ISO matches buyers and sellers of electricity to ensure that enough power is available to meet demand. To these ends, every five minutes the ISO forecasts electrical demands, accounts for operating reserves, and assigns the lowest cost power plant unit to meet demands while ensuring adequate system transmission capacities and capabilities. (Urban Crossroads, 2021a, p. 9)

Part of the ISO’s charge is to plan and coordinate grid enhancements to ensure that electrical power is provided to California consumers. To this end, transmission owners (investor-owned utilities such as SCE) file annual transmission expansion/modification plans to accommodate the State’s growing electrical needs. The ISO reviews and either approves or denies the proposed additions. In addition, and perhaps most importantly, the ISO works with other areas in the western United States electrical grid to ensure that adequate power supplies are available to the State. In this manner, continuing reliable and affordable electrical power is assured to existing and new consumers throughout the State. (Urban Crossroads, 2021a, pp. 9-10)

Table 4.6-2, *SCE 2019 Power Content Mix*, identifies SCE’s specific proportional shares of electricity sources in 2019. As indicated in Table 4.6-2, the 2019 SCE Power Mix has renewable energy at 35.1% of the overall energy resources. Geothermal resources are at 5.9%, wind power is at 11.5%, large hydroelectric sources are at 7.9%, solar energy is at 16%, and coal is at 0%. (Urban Crossroads, 2021a, p. 10)

Table 4.6-2 SCE 2019 Power Content Mix

Energy Resources	2019 SCE Power Mix
Eligible Renewable	35.1%
Biomass & waste	0.6%
Geothermal	5.9%
Small Hydroelectric	1.0%
Solar	16.0%
Wind	11.5%
Coal	0%
Large Hydroelectric	7.9%
Natural Gas	16.1%
Nuclear	8.2%
Other	0.1%
Unspecified Sources of power*	32.6%
Total	100%

* "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources.

(Urban Crossroads, 2021a, Table 2-2)



C. Natural Gas

The usage associated with natural gas use were calculated using the CalEEMod Version 2016.3.2. The following summary of natural gas customers & volumes, supplies, delivery of supplies, storage, service options, and operations is excerpted from information provided by the California Public Utilities Commission (CPUC). (Urban Crossroads, 2021a, pp. 10-13)

“The CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from Pacific Gas and Electric (PG&E), Southern California Gas (SoCalGas), San Diego Gas & Electric (SDG&E), Southwest Gas, and several smaller natural gas utilities. The CPUC also regulates independent storage operators: Lodi Gas Storage, Wild Goose Storage, Central Valley Storage and Gill Ranch Storage.

California's natural gas utilities provide service to over 11 million gas meters. SoCalGas and PG&E provide service to about 5.9 million and 4.3 million customers, respectively, while SDG&E provides service to over 800, 000 customers. In 2018, California gas utilities forecasted that they would deliver about 4740 million cubic feet per day (MMcfd) of gas to their customers, on average, under normal weather conditions.

The overwhelming majority of natural gas utility customers in California are residential and small commercial customers, referred to as "core" customers. Larger volume gas customers, like electric generators and industrial customers, are called "noncore" customers. Although very small in number relative to core customers, noncore customers consume about 65% of the natural gas delivered by the state's natural gas utilities, while core customers consume about 35%.

A significant amount of gas (about 19%, or 1131 MMcfd, of the total forecasted California consumption in 2018) is also directly delivered to some California large volume consumers, without being transported over the regulated utility pipeline system. Those customers, referred to as "bypass" customers, take service directly from interstate pipelines or directly from California producers.

SDG&E and Southwest Gas' southern division are wholesale customers of SoCalGas, i.e., they receive deliveries of gas from SoCalGas and in turn deliver that gas to their own customers. (Southwest Gas also provides natural gas distribution service in the Lake Tahoe area.) Similarly, West Coast Gas, a small gas utility, is a wholesale customer of PG&E. Some other wholesale customers are municipalities like the cities of Palo Alto, Long Beach, and Vernon, which are not regulated by the CPUC.

Natural gas from out-of-state production basins is delivered into California via the interstate natural gas pipeline system. The major interstate pipelines that deliver out-of-state natural gas to California gas utilities are Gas Transmission Northwest Pipeline, Kern River Pipeline, Transwestern Pipeline, El Paso Pipeline, Ruby Pipeline, Mojave Pipeline, and Tuscarora. Another pipeline, the North Baja - Baja Norte Pipeline takes gas off the El Paso Pipeline at the California/Arizona border, and delivers that gas through California into Mexico. While the Federal Energy Regulatory Commission (FERC)



regulates the transportation of natural gas on the interstate pipelines, and authorizes rates for that service, the California Public Utilities Commission may participate in FERC regulatory proceedings to represent the interests of California natural gas consumers.

The gas transported to California gas utilities via the interstate pipelines, as well as some of the California-produced gas, is delivered into the PG&E and SoCalGas intrastate natural gas transmission pipelines systems (commonly referred to as California's "backbone" pipeline system). Natural gas on the utilities' backbone pipeline systems is then delivered to the local transmission and distribution pipeline systems, or to natural gas storage fields. Some large volume noncore customers take natural gas delivery directly off the high-pressure backbone and local transmission pipeline systems, while core customers and other noncore customers take delivery off the utilities' distribution pipeline systems. The state's natural gas utilities operate over 100,000 miles of transmission and distribution pipelines, and thousands more miles of service lines.

Bypass customers take most of their deliveries directly off the Kern/Mojave pipeline system, but they also take a significant amount of gas from California production.

PG&E and SoCalGas own and operate several natural gas storage fields that are located within their service territories in northern and southern California, respectively. These storage fields, and four independently owned storage utilities - Lodi Gas Storage, Wild Goose Storage, Central Valley Storage, and Gill Ranch Storage - help meet peak seasonal and daily natural gas demand and allow California natural gas customers to secure natural gas supplies more efficiently. PG&E is a 25% owner of the Gill Ranch Storage field. These storage fields provide a significant amount of infrastructure capacity to help meet California's natural gas requirements, and without these storage fields, California would need much more pipeline capacity in order to meet peak gas requirements.

Prior to the late 1980s, California regulated utilities provided virtually all natural gas services to all their customers. Since then, the Commission has gradually restructured the California gas industry in order to give customers more options while assuring regulatory protections for those customers that wish to, or are required to, continue receiving utility-provided services.

The option to purchase natural gas from independent suppliers is one of the results of this restructuring process. Although the regulated utilities procure natural gas supplies for most core customers, core customers have the option to purchase natural gas from independent natural gas marketers, called "core transport agents" (CTA). Contact information for core transport agents can be found on the utilities' web sites. Noncore customers, on the other hand, make natural gas supply arrangements directly with producers or with marketers.

Another option resulting from the restructuring process occurred in 1993, when the Commission removed the utilities' storage service responsibility for noncore customers, along with the cost of this service from noncore customers' transportation rates. The Commission also encouraged the development of independent storage fields, and in subsequent years, all the independent storage fields



in California were established. Noncore customers and marketers may now take storage service from the utility or from an independent storage provider (if available), and pay for that service, or may opt to take no storage service at all. For core customers, the Commission assures that the utility has adequate storage capacity set aside to meet core requirements, and core customers pay for that service.

In a 1997 decision, the Commission adopted PG&E's "Gas Accord", which unbundled PG&E's backbone transmission costs from noncore transportation rates. This decision gave customers and marketers the opportunity to obtain pipeline capacity rights on PG&E's backbone transmission pipeline system, if desired, and pay for that service at rates authorized by the Commission. The Gas Accord also required PG&E to set aside a certain amount of backbone transmission capacity in order to deliver gas to its core customers. Subsequent Commission decisions modified and extended the initial terms of the Gas Accord. The "Gas Accord" framework is still in place today for PG&E's backbone and storage rates and services and is now simply referred to as PG&E Gas Transmission and Storage (GT&S).

In a 2006 decision, the Commission adopted a similar gas transmission framework for Southern California, called the "firm access rights" system. SoCalGas and SDG&E implemented the firm access rights system in 2008, and it is now referred to as the backbone transmission system framework. As under the PG&E backbone transmission system, SoCalGas backbone transmission costs are unbundled from noncore transportation rates. Noncore customers and marketers may obtain, and pay for, firm backbone transmission capacity at various receipt points on the SoCalGas system. A certain amount of backbone transmission capacity is obtained for core customers to assure meeting their requirements.

Many if not most noncore customers now use a marketer to provide for several of the services formerly provided by the utility. That is, a noncore customer may simply arrange for a marketer to procure its supplies, and obtain any needed storage and backbone transmission capacity, in order to assure that it will receive its needed deliveries of natural gas supplies. Core customers still mainly rely on the utilities for procurement service, but they have the option to take procurement service from a CTA. Backbone transmission and storage capacity is either set aside or obtained for core customers in amounts to assure very high levels of service.

In order properly operate their natural gas transmission pipeline and storage systems, PG&E and SoCalGas must balance the amount of gas received into the pipeline system and delivered to customers or to storage fields. Some of these utilities' storage capacity is dedicated to this service, and under most circumstances, customers do not need to precisely match their deliveries with their consumption. However, when too much or too little gas is expected to be delivered into the utilities' systems, relative to the amount being consumed, the utilities require customers to more precisely match up their deliveries with their consumption. And, if customers do not meet certain delivery requirements, they could face financial penalties. The utilities do not profit from these financial penalties - the amounts are then returned to customers as a whole. If the utilities find that they are unable to deliver all the gas that is expected to be consumed, they may even call for a curtailment of some gas deliveries. These



curtailments are typically required for just the largest, noncore customers. It has been many years since there has been a significant curtailment of core customers in California.”

As indicated in the preceding discussions, natural gas is available from a variety of in-state and out-of-state sources and is provided throughout the State in response to market supply and demand. Complementing available natural gas resources, biogas may soon be available via existing delivery systems, thereby increasing the availability and reliability of resources in total. The CPUC oversees utility purchases and transmission of natural gas to ensure reliable and affordable natural gas deliveries to existing and new consumers throughout the State. (Urban Crossroads, 2021a, p. 13)

D. Transportation Energy Resources

The Project would generate additional vehicle trips with resulting consumption of energy resources, predominantly gasoline and diesel fuel. In March 2019, the Department of Motor Vehicles (DMV) identified 36.4 million registered vehicles in California, and those vehicles consume an estimated 17.8 billion gallons of fuel each year. Gasoline (and other vehicle fuels) are commercially provided commodities and would be available to the Project patrons and employees via commercial outlets. (Urban Crossroads, 2021a, p. 14)

California’s on-road transportation system includes 394,383 land miles, more than 27.5 million passenger vehicles and light trucks, and almost 8.1 million medium- and heavy-duty vehicles. While gasoline consumption has been declining since 2008 it is still by far the dominant fuel. Petroleum comprises about 91% of all transportation energy use, excluding fuel consumed for aviation and most marine vessels. Nearly 17.8 billion gallons of on-highway fuel are burned each year, including 14.6 billion gallons of gasoline (including ethanol) and 3.2 billion gallons of diesel fuel (including biodiesel and renewable diesel). In 2019, Californians also used 194 million cubic feet of natural gas as a transportation fuel, or the equivalent of 183 billion gallons of gasoline. (Urban Crossroads, 2021a, p. 14)

4.6.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to energy use and conservation.

A. Federal Regulations

1. Intermodal Surface Transportation Efficiency Act (ISTEA)

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of intermodal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions. The applicable MPO for the County of Riverside is the Southern California Association of Governments (SCAG). SCAG’s Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is the applicable planning document for the area. (FHWA, n.d.)



B. State Regulations

1. Integrated Energy Policy Report

Senate Bill 1389 (Bowen, Chapter 568, Statutes of 2002) requires the CEC to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing California's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the State's economy; and protect public health and safety (Public Resources Code § 25301a). The CEC prepares these assessments and associated policy recommendations every two years, with updates on alternate years, as part of the Integrated Energy Policy Report (IEPR). (CEC, n.d.)

The 2017 IEPR focuses on next steps for transforming transportation energy use in California. The 2017 IEPR addresses the role of transportation in meeting state climate, air quality, and energy goals; the transportation fuel supply; the Alternative and Renewable Fuel and Vehicle Technology Program; current and potential funding mechanisms to advance transportation policy; transportation energy demand forecasts; the status of statewide plug-in electric vehicle infrastructure; challenges and opportunities for electric vehicle infrastructure deployment; measuring success and defining metrics within the Alternative and Renewable Fuel and Vehicle Technology Program; market transformation benefits resulting from Alternative and Renewable Fuel and Vehicle Technology Program investments; the state of hydrogen, zero-emission vehicle, biofuels, and natural gas technologies over the next ten years; transportation linkages with natural gas infrastructure; evaluation of methane emissions from the natural gas system and implications for the transportation system; changing trends in California's sources of crude oil; the increasing use of crude-by-rail in California; the integration of environmental information in renewable energy planning processes; an update on electricity reliability planning for Southern California energy infrastructure; and an update to the electricity demand forecast. (CEC, n.d.)

2. California Code Title 24, Part 6, Energy Efficiency Standards

California Code Title 24, Part 6 (also referred to as the California Energy Code) was promulgated by the CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption. To these ends, the California Energy Code provides energy efficiency standards for residential and nonresidential buildings. California's building efficiency standards are updated on an approximately three-year cycle. The 2019 Standards for building construction, which went into effect on January 1, 2020, improved upon the former 2016 Standards for residential and nonresidential buildings. The CEC anticipates that single-family homes built with the 2019 standards will use approximately 7% less energy compared to the residential homes built under the 2016 standards. Additionally, after implementation of solar PV systems, homes built under the 2019 standards will about 53% less energy than homes built under the 2016 standards. Nonresidential buildings will use approximately 30% less energy due to lighting upgrades compared to the prior code. (CEC, n.d.)



3. ***California Renewable Portfolio Standards (RPS)***

The California Energy Commission (CEC) implements and administers portions of California's Renewables Portfolio Standard (RPS). Under the existing RPS, 25% of retail sales are required to be from renewable sources by December 31, 2016, 33% by December 31, 2020, 40% by December 31, 2024, 45% by December 31, 2027, and 50% by December 31, 2030. SB 100 raises California's RPS requirement to 50% renewable resources target by December 31, 2026, and to achieve a 60% target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours (kWh) of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045, and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the Department of Food and Agriculture (CDFA), and the California Air Resources Board (CARB) to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal. (CEC, 2017)

4. ***Pavley Fuel Efficiency Standards (AB 1493)***

In California, AB 1493 establishes fuel efficiency ratings for model year 2009-2016 passenger cars and light trucks. (CARB, n.d.)

5. ***Senate Bill 350 (SB 350) – Clean Energy and Pollution Reduction Act of 2015***

In October 2015, the legislature approved, and the Governor signed, SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the renewables portfolio standard (RPS), higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Specifically, SB 350 requires the following to reduce statewide GHG emissions: (Urban Crossroads, 2021a, p. 17)

- Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 25 percent by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the CEC, and local publicly owned utilities.
- Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.



C. Local Regulations

1. *Riverside County Climate Action Plan (CAP)*

The County of Riverside's most current Climate Action Plan, updated in November 2019 uses several methods to promote renewable energy and energy efficiency. The regulation most relevant to the project is R2-CE1: Clean Energy, which states:

- Clean energy includes energy efficiency and clean energy supply options such as highly efficient combined heat and power as well as renewable energy sources. Installing solar photovoltaics panels on residential and commercial building rooftops is an effective way to produce renewable energy on-site. Moreover, when combined with energy storage systems, solar panels could continuously meet residential and commercial energy demand. The Riverside County Settlement Agreement requires that on-site renewable energy production (including but not limited to solar) shall apply to any tentative tract map, plot plan, or conditional use permit that proposes to add more than 75 new dwelling units of residential development or one or more new buildings totaling more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development. Renewable energy production shall be onsite generation of at least 20 percent of energy demand for commercial, office, industrial or manufacturing development, meet or exceed 20 percent of energy demand for multi-family residential development, and meet or exceed 30 percent of energy demand for single-family residential development. These renewable energy requirements should be updated with every CAP Update by the County based on most recent technology advancements. (Riverside County, 2019, pp. 4-11 and 4-12)

The County of Riverside also has several other non-mandatory regulations that would serve to benefit the Project. For example, CAP measure R2-L1, *Tree Planting for Shading and Energy Saving*, encourages residents and developers to plant trees to lower outdoor summer temperatures. CAP measure R2-L2, *Light Reflecting Surfaces for Energy Saving*, advocates for coating surfaces such as roofs and asphalt with substances that reflect sunlight, for example by painting them white or installing rooftop gardens.

4.6.3 BASIS FOR DETERMINING SIGNIFICANCE

Section VI of Appendix G to the State CEQA Guidelines addresses typical adverse effects due to energy consumption, and includes the following threshold questions to evaluate the Project's impacts on energy resources (OPR, 2018a):

- Would the Project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Significance thresholds set forth in the Riverside County's Environmental Assessment Checklist form, are derived from Section VI of Appendix G to the State CEQA Guidelines (listed above), as modified by the 2018



updates to the State CEQA Guidelines, and state that the proposed Project would have a significant impact on energy resources if construction and/or operation of the Project would:

- a. *Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*
- b. *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

The significance thresholds set forth in the Riverside County's Environmental Assessment Checklist form, as modified by the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on energy.

4.6.4 IMPACT ANALYSIS

A. Methodology for Calculating Project Energy Demands

Information from the CalEEMod Version 2016.3.2 outputs from the Project's Air Quality Analysis ("AQA"; *Technical Appendix B*) was utilized in the analysis, detailing Project related construction equipment, transportation energy demands, and facility energy demands (Urban Crossroads, 2021a).

On October 17, 2017, the SCAQMD, in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the CalEEMod Version 2016.3.2. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources as well as energy usage. Accordingly, CalEEMod has been used to determine the proposed Project's anticipated transportation and facility energy demands. Output from the annual construction and operations model runs are provided in Appendices 4.1 and 4.2 to the Project's Energy Analysis (*Technical Appendix E*). (Urban Crossroads, 2021a, p. 19)

On August 19, 2019, the EPA approved the 2017 version of the Emissions FACtor model (EMFAC) web database for use in State Implementation Plan and transportation conformity analyses. EMFAC2017 is a mathematical model that was developed to calculate emission rates, fuel consumption, Vehicle Miles Travelled (VMT) from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources. This energy study utilizes the different fuel types for each vehicle class from the annual EMFAC2017 emission inventory in order to derive the average vehicle fuel economy which is then used to determine the estimated annual fuel consumption associated with vehicle usage during Project construction (2021) and operational (2025) activities. Year 2021 and 2025 are used as these years represent the start year of Project construction and the opening year of Project operations. If construction or operations occur at a later date, it can be expected that Project energy demands would be less than disclosed herein because CalEEMod incorporates lower emission factors and increased vehicular efficiencies associated with construction equipment and operational vehicular traffic in future years due to improved emissions controls and fleet modernization through turnover. (Urban Crossroads, 2021a, p. 20)



Threshold a.: Would the Project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

A. Construction Energy Demands

1. Construction Equipment Electricity Usage Estimates

The focus within this subsection is the energy implications of the construction process, specifically the power cost from on-site electricity consumption during construction of the proposed Project. Based on the 2021 National Construction Estimator, the typical power cost per 1,000 square feet of construction per month is estimated to be \$2.38. The proposed Project includes the development of 740,960 s.f. of general light industry land uses, 235,220 s.f. of industrial park land uses, 211,700 s.f. of manufacturing uses, 423,400 s.f. of refrigerated warehouse space, 897,780 s.f. of unrefrigerated warehouse space without rail, 3,300 s.f. of other asphalt surfaces, and 11,500 s.f. of non-asphalt surfaces. Based on information provided in the CalEEMod outputs provided by the Project’s AQA (*Technical Appendix B*), facility construction activities would occur over a 52-month period, including one-month for off-site improvements and 51 months for on-site improvements. Based on Table 4.6-3, *Construction Equipment Assumptions*, the total power cost of the on-site electricity usage during the construction of the Project is estimated to be approximately \$306,393.73. (Urban Crossroads, 2021a, p. 21)

Table 4.6-3 Construction Equipment Assumptions

Land Use	Power Cost (per 1,000 SF of building per month of construction)	Total Building Size (1,000 SF)	Construction Duration (months)	Total Project Construction Power Cost
General Light Industry	\$2.38	740.960	51	\$89,937.72
Industrial Park	\$2.38	235.220	51	\$28,551.00
Manufacturing	\$2.38	211.700	51	\$25,696.15
Refrigerated Warehouse	\$2.38	423.400	51	\$51,392.29
Unrefrigerated Warehouse-No Rail	\$2.38	156.820	51	\$19,034.81
Unrefrigerated Warehouse-No Rail	\$2.38	740.960	51	\$89,937.72
Other Asphalt Surfaces	\$2.38	3.300	51	\$400.55
Other Non-Asphalt Surfaces	\$2.38	11.500	51	\$1,395.87
Off-Site Improvements	\$2.38	20.000	1	\$47.60
TOTAL PROJECT CONSTRUCTION COST				\$306,393.73

(Urban Crossroads, 2021a, Table 4-3)

The SCE’s general service rate schedule were used to determine the Project’s electrical usage. As of January 1, 2021, SCE’s general service rate is \$0.11 per kilowatt hours (kWh) of electricity for industrial services. As shown on Table 4.6-4, *Construction Electricity Usage*, the total electricity usage from on-site Project construction related activities is estimated to be approximately 2,784,965 kWh. (Urban Crossroads, 2021a, p. 23)



Table 4.6-4 Construction Electricity Usage

Land Use	Cost per kWh	Total Project Construction Electricity Usage (kWh)
General Light Industry	\$0.11	817,616
Industrial Park	\$0.11	259,555
Manufacturing	\$0.11	233,601
Refrigerated Warehouse	\$0.11	467,203
Unrefrigerated Warehouse-No Rail	\$0.11	173,044
Unrefrigerated Warehouse-No Rail	\$0.11	817,616
Other Asphalt Surfaces	\$0.11	3,641
Other Non-Asphalt Surfaces	\$0.11	12,690
Off-Site Improvements	\$0.11	433
TOTAL PROJECT CONSTRUCTION ELECTRICTY USAGE (kWh)		2,784,965

(Urban Crossroads, 2021a, Table 4-4)

2. Construction Equipment Fuel Estimates

Fuel consumed by construction equipment would be the primary energy resource expended over the course of Project construction. Project construction activity timeline estimates, construction equipment schedules, equipment power ratings, load factors, and associated fuel consumption estimates are presented in Table 4.6-5, *Construction Equipment Fuel Consumption Estimates*. Daily use of equipment is based on the CalEEMod outputs prepared by ECORP as part of the Project’s AQA and included in Appendix 4.1 to the Project’s Energy Analysis (*Technical Appendix E*). The aggregate fuel consumption rate for all equipment is estimated at 18.5 horsepower hour per gallon (hp-hr-gal.), obtained from CARB 2018 Emissions Factors Tables and cited fuel consumption rate factors presented in Table D-24 of the Moyer guidelines. (Urban Crossroads, 2021a, pp. 23, 26)

For the purposes of analysis, the calculations are based on all construction equipment being diesel-powered which is consistent with industry standards. Diesel fuel would be supplied by existing commercial fuel providers serving the County and region. (Urban Crossroads, 2021a, p. 26)

As presented in Table 4.6-5, Project construction activities would consume an estimated 559,372 gallons of diesel fuel. Project construction would represent a “single-event” diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources for this purpose. (Urban Crossroads, 2021a, p. 26)

3. Construction Trips and VMT

Based on the CalEEMod outputs in Appendix 4.1 of the Project’s AQA (*Technical Appendix B*), the trips and trip length are the quantity and length of on-road vehicle trips for workers, vendors, and hauling for each



Table 4.6-5 Construction Equipment Fuel Consumption Estimates

Activity/ Duration	Duration (Days)	Equipment	HP Rating	Quantity	Usage Hours	Load Factor	HP-hrs/day	Total Fuel Consumption (gal. diesel fuel)
Site Preparation	120	Rubber Tired Dozers	247	6	8.00	0.40	4,742	30,762
		Tractors/Loaders/Backhoes	97	8	8.00	0.37	2,297	14,899
Grading	200	Graders	158	4	8.00	0.38	1,921	20,771
		Rubber Tired Dozers	187	2	8.00	0.41	1,227	13,262
		Scrapers	247	2	8.00	0.40	1,581	17,090
		Tractors/Loaders/Backhoes	367	4	8.00	0.48	5,637	60,942
		Cranes	97	4	8.00	0.37	1,148	12,416
Building Construction	810	Forklifts	231	2	7.00	0.29	938	41,063
		Generator Sets	89	6	8.00	0.20	854	37,409
		Tractors/Loaders/Backhoes	84	2	8.00	0.74	995	43,546
		Welders	97	6	7.00	0.37	1,507	65,999
Paving	810	Pavers	46	2	8.00	0.45	331	14,501
		Paving Equipment	130	4	8.00	0.42	1,747	76,499
		Rollers	132	4	8.00	0.36	1,521	66,579
Architectural Coating	810	Air Compressors	80	4	8.00	0.38	973	42,593
Site Preparation - Offsite	1	Graders	187	1	8	0.41	613	33
		Tractors/Loaders/Backhoes	97	1	8	0.37	287	16
Installation of Waterline - Offsite	10	Concrete/Industrial Saws	81	1	7	0.73	414	224
		Cranes	231	0	4	0.29	0	0
		Excavators	158	1	8	0.38	480	260
		Forklifts	89	1	6	0.20	107	58
		Tractors/Loaders/Backhoes	97	1	8	0.37	287	155
Paving - Offsite	5	Cement and Mortar Mixers	9	1	6	0.56	30	8
		Pavers	130	1	7	0.42	382	103
		Rollers	80	1	7	0.38	213	58
		Tractors/Loaders/Backhoes	97	1	7	0.37	251	68
Architectural Coating - Offsite	5	Air Compressors	78	1	6	0.48	225	61
CONSTRUCTION FUEL DEMAND (GALLONS DIESEL FUEL)								559,372

(Urban Crossroads, 2021a, Table 4-5)



construction phase used to develop the associated VMT. The trips identified in Table 4.6-6, *Construction Trips and VMT*, are based on the CalEEMod output files prepared as part of the Project’s AQA. (Urban Crossroads, 2021a, p. 26)

Table 4.6-6 Construction Trips and VMT

Phase Name	Worker Trips / Day	Vendor Trips / Day	Worker Trip Length	Vendor Trip Length
Site Preparation	18	0	14.7	6.9
Grading	20	0	14.7	6.9
Building Construction	1325	517	14.7	6.9
Paving	15	0	14.7	6.9
Architectural Coating	265	0	14.7	6.9
Site Preparation - Offsite	5	0	14.7	6.9
Installation of Waterline - Offsite	10	3	14.7	6.9
Paving - Offsite	10	0	14.7	6.9
Architectural Coating - Offsite	2	0	14.7	6.9

(Urban Crossroads, 2021a, Table 4-6)

4. Construction Worker Fuel Estimates

With respect to estimated VMT for the Project, the construction worker trips would generate an estimated 13,040,837 VMT during the 52 months of construction. Based on the data for Riverside County and included in the 2017 version of the Emission Factor (EMFAC2017) model developed by CARB, it is estimated that 70.7% of all vendor trips are from light-duty-auto vehicles (LDA), 7.2% are from light-duty-trucks (LDT1¹), and 22.1% are from light-duty-trucks (LDT2²). Data regarding Project related construction worker trips were based on EMFAC2017 defaults for the Riverside County annual emission inventory. (Urban Crossroads, 2021a, pp. 26-27)

Vehicle fuel efficiencies for LDA, LDT1, and LDT2 were estimated using information generated within EMFAC2017. EMFAC2017 is a mathematical model that was developed to calculate emission rates based on fuel consumption and VMT from motor vehicles that operate on highways, freeways, and local roads in California and is the primary tool used by CARB to project changes in future emissions from on-road mobile sources. For construction worker emissions, EMFAC2017 was run for the LDA, LDT1, and LDT2 vehicle

¹ Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.

² Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs



classes within the Riverside County (South-Coast) sub-area for the 2021. Data from EMFAC2017 is shown in Appendix 4.3 to the Project’s Energy Analysis (*Technical Appendix E*). (Urban Crossroads, 2021a, p. 27)

As generated by EMFAC2017, an aggregated fuel economy of LDAs ranging from model year 1974 to model year 2021 are estimated to have a fuel efficiency of 31.83 miles per gallon (mpg). Table 4.6-7, *Construction Worker Fuel Consumption Estimates – LDA*, provides an estimated annual fuel consumption resulting from LDAs related to the Project construction worker trips. Based on Table 4.6-7, it is estimated that 325,936 gallons of fuel would be consumed related to construction worker trips during full construction of the Project. (Urban Crossroads, 2021a, p. 27)

Table 4.6-7 Construction Worker Fuel Consumption Estimates – LDA

Construction Activity	Duration (Days)	Worker LDA Trips / Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Site Preparation	120	10	14.7	17,640	31.83	554
Grading	200	11	14.7	32,340	31.83	1,016
Building Construction	810	715	14.7	8,513,505	31.83	267,459
Paving	810	9	14.7	107,163	31.83	3,367
Architectural Coating	810	143	14.7	1,702,701	31.83	53,492
Site Preparation - Offsite	1	3	14.7	44	31.83	1
Installation of Waterline - Offsite	10	6	14.7	882	31.83	28
Paving - Offsite	5	6	14.7	441	31.83	14
Architectural Coating - Offsite	5	2	14.7	147	31.83	5
TOTAL CONSTRUCTION WORKER (LDA) FUEL CONSUMPTION						325,936

(Urban Crossroads, 2021a, Table 4-7)

The EMFAC2017 aggregated fuel economy of LDT1s ranging from model year 1974 to model year 2021 are estimated to have a fuel efficiency of 26.78. Table 4.6-8, *Construction Worker Fuel Consumption Estimates – LDT1*, provides an estimated annual fuel consumption resulting from LDT1s related to the Project construction worker trips. Based on Table 4.6-8, it is estimated that 24,863 gallons of fuel would be consumed related to construction worker trips during full construction of the Project. (Urban Crossroads, 2021a, p. 27)

The EMFAC2017 aggregated fuel economy of LDT2s ranging from model year 1974 to model year 2021 is estimated to have a fuel efficiency of 25.09 mpg. Table 4.6-9, *Construction Worker Fuel Consumption Estimates – LDT2*, provides an estimated annual fuel consumption resulting from LDT2s related to the Project construction worker trips. Based on Table 4.6-9, it is estimated that 79,729 gallons of fuel would be consumed related to construction worker trips during full construction of the Project. (Urban Crossroads, 2021a, p. 28)



Table 4.6-8 Construction Worker Fuel Consumption Estimates – LDT1

Construction Activity	Duration (Days)	Worker LDT1 Trips / Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Site Preparation	120	2	6.9	3,312	26.78	124
Grading	200	2	6.9	2,760	26.78	103
Building Construction	810	96	6.9	536,544	26.78	20,039
Paving	810	2	6.9	11,178	26.78	417
Architectural Coating	810	20	6.9	111,780	26.78	4,175
Site Preparation - Offsite	1	1	6.9	7	26.78	0
Installation of Waterline - Offsite	10	1	6.9	69	26.78	3
Paving - Offsite	5	1	6.9	35	26.78	1
Architectural Coating - Offsite	5	1	6.9	35	26.78	1
TOTAL CONSTRUCTION WORKER (LDT2) FUEL CONSUMPTION						24,863

(Urban Crossroads, 2021a, Table 4-8)

Table 4.6-9 Construction Worker Fuel Consumption Estimates – LDT2

Construction Activity	Duration (Days)	Worker LDT2 Trips / Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Site Preparation	120	4	6.9	3,312	25.09	132
Grading	200	5	6.9	6,900	25.09	275
Building Construction	810	293	6.9	1,637,577	25.09	65,273
Paving	810	4	6.9	22,356	25.09	891
Architectural Coating	810	59	6.9	329,751	25.09	13,144
Site Preparation - Offsite	1	2	6.9	14	25.09	1
Installation of Waterline - Offsite	10	3	6.9	207	25.09	8
Paving - Offsite	5	3	6.9	104	25.09	4
Architectural Coating - Offsite	5	1	6.9	35	25.09	1
TOTAL CONSTRUCTION WORKER (LDT1) FUEL CONSUMPTION						79,729

(Urban Crossroads, 2021a, Table 4-9)

It should be noted that construction worker trips would represent a “single-event” gasoline fuel demand and would not require on-going or permanent commitment of fuel resources for this purpose (Urban Crossroads, 2021a, p. 29).



5. Construction Vendor Fuel Estimates

With respect to estimated VMT, the construction vendor trips (vehicles that deliver materials to the site during construction) would generate an estimated 3,110,530 VMT along area roadways for the Project over the duration of construction activity. Based on the EMFAC2017 inventory data for Riverside County (South Coast) sub-area, 46.1% of all vendor trips are estimated to come from medium-heavy duty trucks (MHDT) and 53.9% are from heavy-heavy duty trucks (HHDT). Vehicle fuel efficiencies for MHDTs and HHDTs were estimated using information generated within EMFAC2017. EMFAC2017 was run for the MHDT and HHDT vehicle classes within the Riverside County (South Coast) sub-area for the 2021 calendar year. Data from EMFAC2017 is shown in Appendix 4.3 to the Project’s Energy Analysis (*Technical Appendix E*). (Urban Crossroads, 2021a, p. 29).

As generated by EMFAC2017, an aggregated fuel economy of MHDTs ranging from model year 1974 to model year 2021 are estimated to have a fuel efficiency of 10.05 mpg. Based on Table 4.6-10, *Construction Vendor Fuel Consumption Estimates – MHDT*, it is estimated that 140,617 gallons of fuel will be consumed related to construction vendor trips (MHDTs) during full construction of the Project. (Urban Crossroads, 2021a, p. 29)

Table 4.6-10 Construction Vendor Fuel Consumption Estimates – MHDT

Construction Activity	Duration (Days)	Vendor Trips / Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Building Construction	810	239	7.3	1,413,207	10.05	140,602
Installation of Waterline - Offsite	10	2	7.3	146	10.05	15
TOTAL CONSTRUCTION VENDOR (MHDT) FUEL CONSUMPTION						140,617

(Urban Crossroads, 2021a, Table 4-10)

Table 4.6-11, *Construction Vendor Fuel Consumption Estimates – HHDT*, shows the estimated fuel economy of HHDTs accessing the Project site. As generated by EMFAC2017, an aggregated fuel economy of HHDTs ranging from model year 1974 to model year 2021 are estimated to have a fuel efficiency of 6.89 mpg, respectively. Based on Table 4.6-11, fuel consumption from construction vendor trips (HHDTs) would total approximately 246,463 gallons. (Urban Crossroads, 2021a, p. 29)

It should be noted that like all construction activities, Project construction vendor trips would represent a “single-event” diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources for this purpose (Urban Crossroads, 2021a, p. 30).



Table 4.6-11 Construction Vendor Fuel Consumption Estimates – HHDT

Construction Activity	Duration (Days)	Vendor Trips / Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Building Construction	810	287	7.3	1,697,031	6.89	246,442
Installation of Waterline - Offsite	10	2	7.3	146	6.89	21
TOTAL CONSTRUCTION VENDOR (HHDT) FUEL CONSUMPTION						246,463

(Urban Crossroads, 2021a, Table 4-11)

6. Construction Energy Efficiency/Conservation Measures

Starting in 2014, CARB adopted the nation's first regulation aimed at cleaning up off-road construction equipment such as bulldozers, graders, and backhoes. These requirements ensure fleets gradually turnover the oldest and dirtiest equipment to newer, cleaner models and prevent fleets from adding older, dirtier equipment. As such, the equipment used for Project construction would conform to CARB regulations and California emissions standards. It should also be noted that there are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities, or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the Project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel. (Urban Crossroads, 2021a, p. 30)

Construction contractors would be required to comply with applicable CARB regulations regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. Compliance with anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption. (Urban Crossroads, 2021a, p. 30)

Additional construction-source energy efficiencies would occur due to required California regulations and best available control measures (BACM). For example, CCR Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Section 2449(d)(3) requires that “grading plans shall reference the requirement that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling.” In this manner, construction equipment operators are required to be informed that engines are to be turned off at or prior to five minutes of idling. Enforcement of idling limitations is realized through periodic site inspections conducted by County building officials, and/or in response to citizen complaints. (Urban Crossroads, 2021a, pp. 30-31)



In general, the construction processes promote conservation and efficient use of energy by reducing raw materials demands, with related reduction in energy demands associated with raw materials extraction, transportation, processing, and refinement. Use of materials in bulk reduces energy demands associated with preparation and transport of construction materials as well as the transport and disposal of construction waste and solid waste in general, with corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations. (Urban Crossroads, 2021a, p. 31)

B. Operational Energy Demands

Energy consumption in support of or related to Project operations would include transportation energy demands (energy consumed by passenger car and truck vehicles accessing the Project site) and facilities energy demands (energy consumed by building operations and site maintenance activities). (Urban Crossroads, 2021a, p. 31)

1. Transportation Energy Demands

Energy that would be consumed by Project-generated traffic is a function of total VMT and estimated vehicle fuel economies of vehicles accessing the Project site. To assess operational energy demand, EMFAC2017 was run for all vehicle classes within the Riverside County (South Coast) sub-area for the 2025 calendar year to develop fuel efficiencies for vehicles associated with the operation of the Project. VMT data is provided in Appendix 4.2 to the Project's Energy Analysis (*Technical Appendix E*) and data from EMFAC2017 is shown in Appendix 4.3 to the Project's Energy Analysis. As shown in Table 4.6-12, *Total Project-Generated Traffic Annual Fuel Consumption (All Vehicles)*, the Project would result in 41,264,710 annual VMT and an estimated annual fuel consumption of 3,552,331 gallons of fuel. These calculations are conservative and do not include any measures to reduce VMT from vehicles. (Urban Crossroads, 2021a, p. 31)

2. Facility Energy Demands

Project building operations and Project site maintenance activities would result in the consumption of natural gas and electricity. Natural gas would be supplied to the Project by SoCalGas and electricity would be supplied to the Project by SCE. Annual energy demand is based on the CalEEMod outputs prepared as part of the Project's AQA (*Technical Appendix B*). Annual natural gas and electricity demands of the Project are summarized in Table 4.6-13, Project Annual Operational Energy Demand Summary, and provided in Appendix 4.1 to the Project's Energy Analysis (*Technical Appendix E*). (Urban Crossroads, 2021a, p. 31)

3. Operational Energy Efficiency/Conservation Measures

Energy efficiency/energy conservation attributes of the Project would be complemented by increasingly stringent State and federal regulatory actions addressing vehicle fuel economies and vehicle emissions standards, and enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title 24, California Green Building Standards Code). (Urban Crossroads, 2021a, p. 33)



Table 4.6-12 Total Project-Generated Traffic Annual Fuel Consumption (All Vehicles)

Vehicle Type	Annual Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Annual Fuel Consumption (gallons)
LDA	9,294,340	36.06	257,780
LDT1	951,523	30.19	31,516
LDT2	2,973,509	29.13	102,074
MDV	118,940	23.06	5,158
LHD1	1,121,438	15.03	74,638
LHD2	305,847	15.68	19,509
MHDT	4,296,362	11.10	386,903
HHDT	19,976,868	7.66	2,608,070
OBUS	67,966	7.04	9,649
MCY	2,157,918	37.84	57,035
Total (All Vehicles)	41,264,710	NA	3,552,331

(Urban Crossroads, 2021a, Table 4-12)



Table 4.6-13 Project Annual Operational Energy Demand Summary

Natural Gas Demand	kBTU/year
General Light Industry	20,659,300
Industrial Park	571,359
Manufacturing	5,902,680
Other Asphalt Surfaces	0
Other Non- Asphalt Surfaces	0
Refrigerated Warehouse-No Rail	21,502,500
Unrefrigerated Warehouse-No Rail	1,059,570
Unrefrigerated Warehouse-No Rail	224,247
TOTAL PROJECT NATURAL GAS DEMAND	49,919,656

kBTU – kilo-British Thermal Units

Electricity Demand	kWh/year
General Light Industry	7,031,670
Industrial Park	2,022,690
Manufacturing	2,009,050
Other Asphalt Surfaces	0
Other Non- Asphalt Surfaces	0
Refrigerated Warehouse-No Rail	16,780,300
Unrefrigerated Warehouse-No Rail	1,666,410
Unrefrigerated Warehouse-No Rail	352,679
TOTAL PROJECT ELECTRICITY DEMAND	29,862,799

kWh - kilo-Watt hours

(Urban Crossroads, 2021a, Table 4-13)

Project annual fuel consumption estimates presented previously in Table 4.6-12 represent likely potential maximums that would occur for the Project. Under subsequent future conditions, average fuel economies of vehicles accessing the Project site can be expected to improve as older, less fuel-efficient vehicles are removed from circulation, and in response to fuel economy and emissions standards imposed on newer vehicles entering the circulation system. (Urban Crossroads, 2021a, p. 33)

Enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. Location of the Project proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. (Urban Crossroads, 2021a, p. 33)

The future development under the Project would comply with the County’s Transportation Demand Management Ordinance, which includes the provision of preferential parking for carpool and rideshare



vehicles, on-site bicycle storage facilities, lockers and shower facilities, and sidewalks or paved pathways from the external pedestrian circulation system to each building. (Urban Crossroads, 2021a, p. 33)

C. Conclusion

As supported by the preceding analyses, Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. Future building permit applications associated with the Project would be required to comply with the 2019 Title 24 standards. The CEC anticipates that non-residential buildings will use approximately 30% less energy due to lighting upgrades compared to the prior code. As such, energy consumed by the Project's operation is calculated to be comparable to, or less than, energy consumed by other older warehouse uses of similar scale and intensity that are constructed and operating in California. Additionally, the Project's proximity to the Interstate freeway system would reduce VMT and therefore decrease reliance on fossil fuels. On this basis, the Project would not result in the inefficient, wasteful, or unnecessary consumption of energy. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservation goals within the State of California. Therefore, the Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant.

Threshold b.: Would the Project conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?

A summary of the Project's consistency with applicable regulations and requirements is provided below.

Consistency with Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

Transportation and access to the Project site is provided by the local and regional roadway systems. The Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because the Southern California Association of Governments (SCAG) is not planning for intermodal facilities on or through the Project site. (Urban Crossroads, 2021a, p. 35)

Consistency with the Transportation Equity Act for the 21st Century (TEA-21)

The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the Project facilitates access, acts to reduce vehicle miles traveled, takes advantage of existing infrastructure systems, and promotes land use compatibilities through collocation of similar uses. The Project supports the strong planning processes emphasized under TEA-21. The Project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21. (Urban Crossroads, 2021a, p. 35)



Consistency with 2019 Integrative Energy Policy Report (IEPR)

Electricity would be provided to the Project by SCE and natural gas would be provided by SoCalGas. SCE's Clean Power and Electrification Pathway (CPEP) white paper and SoCalGas 2018 Corporate Sustainability Report builds on existing state programs and policies. As such, the Project is consistent with, and would not otherwise interfere with, nor obstruct implementation the goals presented in the 2019 IEPR. (Urban Crossroads, 2021a, p. 35)

Consistency with State of California Energy Plan

The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the Project facilitates access and takes advantage of existing infrastructure systems. The Project therefore supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan. (Urban Crossroads, 2021a, pp. 35-36)

Consistency with California Code Title 24, Part 6, Energy Efficiency Standards

The 2019 version of Title 24 was adopted by the CEC and became effective on January 1, 2020. It should be noted that the analysis herein assumes compliance with the 2019 Title 24 Standards. The CEC anticipates that nonresidential buildings will use approximately 30% less energy compared to the prior code. (Urban Crossroads, 2021a, p. 36)

Consistency with Assembly Bill 1493 (AB 1493)

AB 1493 is not applicable to the Project as it is a Statewide measure establishing vehicle emissions standards. No feature of the Project would interfere with implementation of the requirements under AB 1493. (Urban Crossroads, 2021a, p. 36)

Consistency with Renewable Portfolio Standard (RPS)

California's Renewable Portfolio Standard (RPS) is not applicable to the Project as it is a Statewide measure that establishes a renewable energy mix. No feature of the Project would interfere with implementation of the requirements under RPS. (Urban Crossroads, 2021a, p. 36)

Consistency with Senate Bill 350 (SB 350)

The proposed Project would use energy from SCE, which has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. No feature of the Project would interfere with implementation of SB 350. Additionally, the Project would be designed and constructed to implement the energy efficiency measures and would include several measures designed to reduce energy consumption. (Urban Crossroads, 2021a, p. 36)



Consistency with the County of Riverside Climate Action Plan (CAP)

The Project Applicant would be required to install solar panels on future buildings to achieve more than 20% of energy from on-site renewable sources as required by CAP measure R2-CE1, *Clean Energy*. The Project Applicant also would be required to incorporate environmentally sound landscaping into the project, as required by CAP measure R2-L1, *Tree Planting for Shading and Energy Saving*. Additionally, and as documented in EIR Subsection 4.8, *Greenhouse Gas Emissions*, and as shown in Table 3-4 of the Project's AQA (*Technical Appendix B*), the Project would be required to achieve a minimum of 100 points pursuant to the CAP Screening Tables (CAP Appendix D). As such, no feature of the Project would conflict with the County of Riverside Climate Action Plan.

Conclusion

As indicated in the preceding analysis, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Thus, impacts would be less than significant.

4.6.5 CUMULATIVE IMPACT ANALYSIS

As indicated under the analysis of Threshold a., there are no components of the proposed Project that would result in the wasteful, inefficient, or unnecessary consumption of energy resources. Although it is possible other cumulative developments could result in the wasteful, inefficient, or unnecessary consumption of energy resources, the Project's projected energy demand during operations would be less-than-cumulatively considerable with mandatory compliance with applicable regulations.

As indicated under the analysis of Threshold b., the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As such, the Project has no potential to result in cumulatively-considerable impacts due to a conflict with or obstruction of such plans.

4.6.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Less-than-Significant Impact. Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservation goals within the State of California. As such, Project impacts due to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant requiring no mitigation.

Threshold b.: Less-than-Significant Impact. Energy consumed by the Project's operation is calculated to be comparable to, or less than, energy consumed by other warehouse projects of similar scale and intensity that are operating in California, as the Project would be subject to current regulatory requirements, such as the 2019 version of Title 24, which was not in effect when most existing developments were constructed. Specifically, the CEC anticipates that non-residential buildings will use approximately 30% less energy due to lighting upgrades compared to the 2016 version of the Title 24 requirements. Moreover, the Project would be subject



to compliance with the Riverside County CAP and would be required to achieve a minimum of 100 points per the CAP screening tables, which would further reduce the Project's energy demand. Based on the analysis presented herein, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

4.6.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are applicable regulations and design requirements within the County of Riverside. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable City regulations and design requirements.

- Pavley Fuel Efficiency Standards (AB1493). Establishes fuel efficiency ratings for new vehicles.
- Renewable Portfolio Standards (SB 100). Increases California's RPS requirement to 50% renewable resources target by December 31, 2026, and to achieve a 60% target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours (kWh) of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the Department of Food and Agriculture (CDFA), and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.
- CCR Title 13, Motor Vehicles, Section 2449(d)(3), *Idling*. Grading plans shall reference the requirement that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling.

Mitigation

Project impacts due to energy consumption would be less than significant; therefore, mitigation measures are not required.



4.7 GEOLOGY AND SOILS

This Subsection assesses the existing surface and subsurface geologic conditions and features of the Project site and determines the potential for impacts associated with these features. The analysis in this Subsection is based, in part, on information from the report titled, “Geotechnical Update Report, Proposed Industrial Park Development, Renaissance Ranch Project, Horsethief Canyon Area of Riverside County, California,” prepared by Petra Geosciences (herein, “Petra”), dated July 30, 2020, and included as EIR *Technical Appendix F1* (Petra, 2020). The Geotechnical Update Report makes reference to two geotechnical studies that were prepared in conjunction with the original adoption of the Renaissance Ranch Specific Plan No. 333. The first report, which addresses geotechnical conditions for a majority of the Project site (i.e., for Planning Areas 2 through 6 of proposed SP 333A1), was prepared by GeoSoils, Inc. (herein, “GeoSoils”), is entitled, “Geotechnical Feasibility Investigation, Tentative Tract Map No. 31210, ±134-Acre Parcel, Horsethief Canyon Area, Riverside County, California,” is dated April 28, 2003, and is included as EIR *Technical Appendix F2* (GeoSoils, 2003a). The second report, also prepared by GeoSoils, is entitled, “Geotechnical Feasibility Investigation, Tentative Tract 31485, +23-Acres, Horsethief Canyon Area, Riverside County, California,” is dated June 30, 2003, and is included as EIR *Technical Appendix F3* (GeoSoils, 2003b). This Subsection also relies on information contained in the “Renaissance Ranch Specific Plan Final Environmental Impact Report (SCH No. 2003071177), dated October 2004, which was prepared in conjunction with the adoption of the Renaissance Ranch Specific Plan No. 333 (Riverside County, 2004). For purposes of discussion herein, the northwestern portion of the Project site (corresponding to Planning Area 1 of proposed SP 333A1) is referred to as the “Northern Area,” while the remaining portions of the Project site (corresponding to Planning Areas 2 through 5 of proposed SP 333A1) are referred to as the “Southern Area.”

4.7.1 EXISTING CONDITIONS

A. Regional Geology

The Project site is situated in the northern portion of the Peninsular Range Province of Southern California. In general, the Peninsular Ranges are underlain primarily of plutonic rock of the Southern California Batholith. These rocks formed from the cooling of molten magma deep within the earth's crust. Intense heat associated with the plutonic magma metamorphosed the ancient sedimentary rocks into which the plutons intruded. (Petra, 2020, p. 5)

Specifically, the Project site is located in the western portion of the Perris Peneplain, which is a broad valley bounded on three sides by mountain ranges: the San Jacinto Mountains on the east, the San Bernardino Mountains on the north, and the Santa Ana Mountains to the west. The northwestern extent of the Perris Peneplain is the Santa Ana River. The Peneplain is a large depositional basin composed primarily of materials eroded from the granitic bedrock surfaces of the Southern California Batholith. Granitic and/or metasedimentary bedrock related to the Santa Ana Mountains are located just to the south of the Project site. (Petra, 2020, pp. 5-6)



B. Local Geology and Subsurface Soil Conditions

The Project site is located on the distal portion of a large alluvial fan emanating from the Santa Ana mountains further to the southwest. These fan deposits are generally mapped as Pleistocene aged older fan deposits and are incised by various recent drainages generally trending to the north. These incised drainages have been infilled with recent alluvium including active wash deposits and existing undocumented fill. Older fan deposits are generally located in the elevated portions of the Project site. Recent alluvium is prominently in the eastern portion of the site and within the drainages overlying the older fan deposits. Appendix A to the Project's Geotechnical Evaluation (*Technical Appendix F1*) includes geologic maps which depict the approximate surface contact between the two main units. In some places, a thin veneer of topsoil and/or colluvium is present above the older fan deposits and younger alluvium. Existing artificial fill from past residential development is present along the southern and western edges of the site. Undocumented fill is present in various places on the site due to undocumented filling of canyons with trash and debris and bridging drainages for agriculture purposes. Provided below is a summary of on-site geologic units. (Petra, 2020, p. 6)

- Artificial Fill – Undocumented. Areas of undocumented artificial fill materials were locally observed in many locations across the Project site. The undocumented fill, ranging from approximately one to ten feet in thickness (roadway fills), appears to have been placed during previous agricultural operations (i.e., citrus groves). Due to the potentially compressible nature of these soils/materials, they are considered unsuitable for support of structures and/or improvements in their existing state. Clean fill materials may be reused for compacted fills provided that any organic materials have been removed, and they have been approved by the geotechnical engineer prior to placement. (Riverside County, 2004, pp. II-26 and II-27)
- Artificial Fill – Engineered. Localized areas of engineered artificial fill, associated with existing fill slopes, descend to the property on the western and southern perimeters of the site. The fill slopes, up to ten (10) feet in height onsite, appear to have been constructed during grading of the adjacent Horsethief Canyon Ranch residential development. The upper one or two feet of the engineered fill is extremely weathered, and erosional rills are common. (Riverside County, 2004, p. II-27)
- Colluvium/Topsoil. This geologic unit was observed mantling the Quaternary fan deposits throughout the site. These soils were generally observed to be approximately one to four feet in thickness. The colluvium/topsoil varied from yellowish to reddish brown, medium to dark brown, silty to clayey sands. The colluvium/topsoil was generally non-uniform, dry to locally damp, and loose/soft. These soils typically have a very low to low expansion potential; however, some clayey factions may have a medium expansion potential. (Riverside County, 2004, pp. II-27 and II-28)
- Alluvium – Younger. Quaternary alluvial sediments were encountered in the incised drainage channels/canyons on the north-northeastern portion of the Project site. These sediments were generally observed to be predominantly light to dark brown, silty, fine- to coarse-grained sands and silty sands. The alluvial sediments varied from dry to damp, and were generally loose to medium dense with depth. Where encountered, these sediments generally ranged from four to 30 feet in thickness, in the areas



proposed for development. The alluvium typically has a very low expansion potential. (Riverside County, 2004, p. II-28)

- Quaternary Fan Deposits - Older (Pleistocene-age Alluvial Fans). These soils were encountered underlying the fill, colluvium/topsoil, and younger alluvial soils onsite. These sediments were generally observed to be generally medium to reddish brown, silty to clayey fine- to coarse-grained sands and sandy gravels with locally abundant cobbles and boulders. The cobbles and boulders were generally granitic, well rounded to sub-rounded and highly weathered (grussified); however, localized areas of intact non-weathered cobbles and boulders were encountered. These deposits are mapped as late Pleistocene-age. The sediments generally varied from dry to damp, and ranged from medium dense to very dense with depth. As encountered onsite, the fan deposits typically have a very low expansion potential; however, some clayey factions may have a medium expansion potential. D (Riverside County, 2004, p. II-28)

C. Groundwater

Groundwater was encountered in the lower eastern canyons of the Southern Area at approximately 10 to 20 feet below ground surface (bgs). These groundwater depths in the Southern Area are equivalent to about 1,160 to 1,180 feet amsl. Seepage was noted in test pits at 2 to 20 feet bgs in the lower canyons of the Northern Area. These groundwater depths in the Northern Area are equivalent to about 1,210 to 1,250 feet amsl. Research for other sources of groundwater levels in the vicinity of the site did not indicate available groundwater data. In addition, no seepage was noted in the canyon sidewalls of the Northern and Southern Areas. Based on available data, a groundwater table could not be inferred beneath the Project site. Therefore, it is reasonable to estimate groundwater in the elevated areas of the Southern Area as being greater than 50 feet in depth. Groundwater within the Northern Area should be considered as being within 20 feet in depth. These estimates reflect site conditions at the time of previous investigations in 2003 to 2005 and do not preclude changes in local groundwater conditions from heavy irrigation, precipitation, or other factors not obvious in the alluvium and fan deposits. (Petra, 2020, pp. 6-7)

D. Faulting and Seismicity

1. Faulting

Based on a review of published and unpublished geologic maps, no known active faults are located within or immediately adjacent to the Project site. Additionally, the Project site does not lie within an “Earthquake Fault Zone” as defined by the State of California in the Alquist-Priolo (AP) Earthquake Fault Hazard Zoning Act or within a Riverside County fault zone. Based on a review of published and unpublished geotechnical maps and literature pertaining to Project site and regional geology, the closest active fault to the site is the Elsinore fault-Glen Ivy Section located approximately 0.6 mile to the southwest, which is the most significant fault with respect to anticipated ground motions at the site due to its proximity and large possible magnitude. (Petra, 2020, p. 7)



2. ***Secondary Seismic Effects***

Secondary effects of seismic activity normally considered as possible hazards to a site include several types of ground failure. Various general types of ground failures, which might occur as a consequence of severe ground shaking at the site, include ground subsidence, ground lurching and lateral spreading. The probability of occurrence of each type of ground failure depends on the severity of the earthquake, distance from faults, topography, subsoil, and groundwater conditions, in addition to other factors. Landslides or evidence for surficial slope instability were not observed within the Project site during site reconnaissance conducted by Petra or fieldwork conducted by others, however ongoing erosion along near vertical cuts along the major active drainages is present. The potential for ground lurching and lateral spreading are considered very low. The potential for seismically-induced flooding due to tsunami or seiche (i.e., a wave-like oscillation of the surface of water in an enclosed basin) is considered negligible at the Project site. (Petra, 2020, p. 7)

3. ***Liquefaction and Seismically-Induced Settlement***

Liquefaction occurs when dynamic loading of a saturated sand or silt causes pore-water pressures to increase to levels where grain-to-grain contact is lost, and the material temporarily behaves as a viscous fluid. Liquefaction can cause settlement of the ground surface, settlement and tilting of engineered structures, flotation of buoyant buried structures and fissuring of the ground surface. (Petra, 2020, p. 7)

According to Riverside County GIS, the Project site is mapped as having a low to moderate liquefaction susceptibility. The low zones generally coincide with the older alluvial areas and the moderate zones generally coincide with the younger alluvial areas and drainages. Based on the absence of a shallow groundwater table in the older fan deposits, the dense to very dense nature of the older fan, the potential for liquefaction in the Southern Area and for seismic (i.e., dynamic) settlement, in the form of dry sand settlement, are anticipated to be very low. (Petra, 2020, p. 8)

E. Compressible Soils

A geotechnical factor affecting the Project site is the presence of porous, dry, and compressible near-surface undocumented fills, topsoil/colluvium, alluvial soils, and weathered terrace deposits. Such materials in their present state are not considered suitable for support of fill or structural loads. (Petra, 2020, p. 8)

F. Volumetric Changes – Shrinkage and Subsidence

Volumetric changes in earth quantities occur when excavated onsite soil and bedrock materials are replaced as properly compacted fill. Provided below is an estimate of shrinkage and bulking factors for the various geologic units present onsite: (Petra, 2020, pp. 8-9)

- Artificial Fill: Shrinkage 15 to 20%
- Topsoil/Colluvium: Shrinkage 10% to 15%
- Younger Alluvium: Shrinkage 15 to 20%
- Weathered Quaternary Fan Deposits: Shrinkage 5% to 10%
- Quaternary Fan Deposits: Bulking 0 to 5%



Subsidence from scarification and re-compaction of exposed bottom surfaces in over-excavated areas to receive fill is expected to vary from negligible to approximately 0.1 foot (Petra, 2020, p. 9).

4.7.2 APPLICABLE ENVIRONMENTAL REGULATIONS

The following is a brief description of the federal, state, and local environmental laws and related regulations governing issues related to geology and soils.

A. Federal Regulations

1. Clean Water Act

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. (EPA, n.d.)

B. State Regulations

1. Alquist-Priolo Earthquake Fault Zoning Act (A-P Act)

The Alquist-Priolo Earthquake Fault Zoning Act (A-P Act) was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The A-P Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The A-P Act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards. (CA Legislative Info, n.d.)

The A-P Act requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps. ["Earthquake Fault Zones" were called "Special Studies Zones" prior to January 1, 1994.] The maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Local agencies must regulate most development projects within the zones. Projects include all land divisions and most structures for human occupancy. Single family wood-frame and steel-frame dwellings up to two stories not part of a development of four units or more are exempt. However, local agencies can be more restrictive than state law requires. (CA Legislative Info, n.d.)



Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed buildings will not be constructed across active faults. An evaluation and written report of a specific site must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet). (CA Legislative Info, n.d.)

2. *Seismic Hazards Mapping Act*

The Seismic Hazards Mapping Act (SHMA) of 1990 (Public Resources Code, Chapter 7.8, § 2690-2699.6) directs the Department of Conservation, California Geological Survey to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. The purpose of the SHMA is to minimize loss of life and property through the identification, evaluation, and mitigation of seismic hazards. (CDC, n.d.)

Staff geologists in the Seismic Hazard Zonation Program gather existing geological, geophysical, and geotechnical data from numerous sources to produce the Seismic Hazard Zone Maps. They integrate and interpret these data regionally in order to evaluate the severity of the seismic hazards and designate as Zones of Required Investigation (ZORI) those areas prone to liquefaction and earthquake-induced landslides. Cities and counties are then required to use the Seismic Hazard Zone Maps in their land use planning and building permit processes. (CDC, n.d.)

The SHMA requires site-specific geotechnical investigations be conducted within the Zones of Required Investigation to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy. (CDC, n.d.)

3. *Natural Hazards Disclosure Act*

The Natural Hazards Disclosure Act, effective June 1, 1998 (as amended June 9, 1998), requires that sellers of real property and their agents provide prospective buyers with a "Natural Hazard Disclosure Statement" when the property being sold lies within one or more state-mapped hazard areas, including a Seismic Hazard Zone. (CA Legislative Info, n.d.)

The law requires the State Geologist to establish regulatory zones (Zones of Required Investigation) and to issue appropriate maps (Seismic Hazard Zone maps). These maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling construction and development. Single-family frame dwellings up to two stories not part of a development of four or more units are exempt from the state requirements. However, local agencies can be more restrictive than state law requires. (CA Legislative Info, n.d.)

Before a development permit can be issued or a subdivision approved, cities and counties must require a site-specific investigation to determine whether a significant hazard exists at the site and, if so, recommend measures to reduce the risk to an acceptable level. The investigation must be performed by state-licensed engineering geologists and/or civil engineers. (CA Legislative Info, n.d.)



4. Essential Services Buildings Seismic Safety Act

In 1986, the California Legislature determined that buildings providing essential services should be capable of providing those services to the public after a disaster. Their intent in this regard was defined in legislation known as the Essential Services Buildings Seismic Safety Act of 1986 and includes requirements that such buildings shall be "...designed and constructed to minimize fire hazards and to resist...the forces generated by earthquakes, gravity, and winds." This enabling legislation can be found in the California Health and Safety Code, Chapter 2, § 16000 through 16022. In addition, the California Building Code defines how the intent of the act is to be implemented in Title 24, Part 1 of the California Building Standards Administrative Code, Chapter 4, Articles 1 through 3. (CAB, n.d.)

5. California Building Standards Code (Title 24)

California Code of Regulations (CCR) Title 24 is reserved for state regulations that govern the design and construction of buildings, associated facilities, and equipment. These regulations are also known as building standards (reference California Health and Safety Code § 18909). Health and Safety Code (state law) § 18902 gives CCR Title 24 the name California Building Standards Code (CBSC). (CBSC, 2019, p. 1)

The CBSC in CCR Title 24 is published by the California Building Standards Commission and it applies to all building occupancies (see Health and Safety Code §§ 18908 and 18938) throughout the State of California. Cities and counties are required by state law to enforce CCR Title 24 (reference Health and Safety Code §§ 17958, 17960, 18938(b), and 18948). Cities and counties may adopt ordinances making more restrictive requirements than provided by CCR Title 24, because of local climatic, geological, or topographical conditions. Such adoptions and a finding of need statement must be filed with the California Building Standards Commission (Reference Health and Safety Code §§ 17958.7 and 18941.5). (CBSC, 2019, p. 1)

6. Porter-Cologne Water Control Act

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code § 13000 *et seq.*), the policy of the State is as follows:

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation. (SWRCB, 2014)

The Porter-Cologne Act established nine Regional Water Boards (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility



for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and Regional Water Boards have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management.

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The Storm Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions. (SWRCB, 2014)

The Porter-Cologne Act also implements many provisions of the Clean Water Act, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. (SWRCB, 2014) The Project site is located in the Santa Ana River Watershed, which is within the purview of Santa Ana Regional Water Quality Control Board (RWQCB). The RWQCB's Santa Ana Region Basin Plan ("Basin Plan"), as most recently updated in June 2019, is the governing water quality plan for the region (RWQCB, 2019).

C. Local Regulations

1. Riverside County Ordinance No. 457 - Riverside County Building and Fire Codes

Every three years, Riverside County's Building and Fire Codes are adapted from the California Building Standards Code (CCR Title 24), which includes both building and fire codes. These codes establish site-specific investigation requirements, construction standards and inspection procedures to ensure that development authorized by the County of Riverside does not pose a threat to the health, safety, or welfare of the public. The California Building Standards Code contains minimum baseline standards to guard against unsafe development. This ordinance also adopts, in some cases with modification to a stricter standard, a number of California State's Title 24 codes (fire, building, plumbing, electrical, etc.). The Riverside County Department of Building and Safety provides technical expertise in reviewing and enforcing these codes. (Riverside County, 2015, p. 4.12-25)



2. *Riverside County Ordinance No. 547 - Implementation of the Alquist-Priolo Earthquake Fault Zoning Act*

This ordinance establishes the policies and procedures used by the County of Riverside to implement the A-P Act. Among other things, it requires all projects proposed within an “earthquake fault zone,” as shown on the maps prepared by the State Geologist to comply with the provisions of the A-P Act. It establishes regulations for construction, including for grading, slopes and compaction, erosion control, retaining wall design and earthquake fault zone setbacks. (Riverside County, 2015, p. 4.12-25)

3. *Riverside County Ordinance No. 484 – Control of Blowing Dust*

This ordinance establishes requirements for the control of blowing sand within county-designated “Agricultural Dust Control Areas.” It defines activities that may contribute to wind erosion, identifies restrictions on activities within these areas, establishes penalties for violation of the ordinance and identifies procedures necessary to obtain a valid permit. (Riverside County, 2015, p. 4.12-25)

4.7.3 BASIS FOR DETERMINING SIGNIFICANCE

Section VI of Appendix G to the State CEQA Guidelines addresses typical adverse effects due to geological conditions, and includes the following threshold questions to evaluate the Project’s impacts resulting from geologic or soil conditions (OPR, 2018a):

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - 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? Refer to Division of Mines and Geology Special Publication 42.
 - Strong seismic ground shaking?
 - Seismic-related ground failure, including liquefaction?
 - Landslides?
- Result in substantial soil erosion or the loss of topsoil?
- 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, subsidence, liquefaction or collapse?
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?
- Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?



Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, as modified based on the 2018 updates to Section VII of Appendix G to the State CEQA Guidelines (listed above), and indicate significant impacts would occur if the Project or any Project-related component would:

- 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;*
- b. *Be subject to seismic-related ground failure, including liquefaction;*
- c. *Be subject to strong seismic ground shaking;*
- d. *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;*
- e. *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;*
- f. *Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard;*
- g. *Change topography or ground surface relief features;*
- h. *Create cut or fill slopes greater than 2:1 or higher than 10 feet;*
- i. *Result in grading that affects or negates subsurface sewage disposal systems;*
- j. *Result in substantial soil erosion or the loss of topsoil;*
- k. *Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), creating substantial direct or indirect risks to life or property;*
- l. *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;*
- m. *Be impacted by or result in an increase in wind erosion and blow sand, either on or off site.*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, as modified by the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on geology and soils. It should be noted that impacts to paleontological resources and unique geologic features are addressed separately in Subsection 4.13, *Paleontological Resources*, of this EIR.



4.7.4 IMPACT ANALYSIS

Threshold a.: *Would the Project 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?*

Threshold c.: *Would the Project be subject to strong seismic ground shaking?*

The Project site is not located within a State of California Earthquake Fault Zone (i.e., Alquist- Priolo Earthquake Fault Act Zone) and no active faults are known to cross the site. The closest active fault to the site is the Elsinore fault-Glen Ivy Section located approximately 0.6 mile to the southwest. Impacts due to rupture of a known earthquake would therefore be less than significant. (Petra, 2020, p. 7)

The Project site is, however, located in a seismically active area of southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. The risk is not considered substantially different than that of other similar properties in the southern California area. The Project would be required to construct all proposed structures in accordance with the California Building Standards Code (CBSC, Title 24) and the Riverside County Building Code. The CBSC and Riverside County Building Code have been designed to preclude significant adverse effects associated with strong seismic ground shaking.

Notwithstanding, the Project is being evaluated at a programmatic level and as project-specific plans are proposed, they will be accompanied by project-specific geotechnical studies with recommendations for addressing project-specific seismic impacts. Grading plans would be required for future implementing developments, and proposed grading plans would be required to incorporate the recommendations of the future-required site-specific geotechnical evaluations. However, a significant impact due to strong seismic ground shaking could occur if future developments failed to incorporate the site-specific recommendations of the future-required geotechnical studies. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required.

Threshold b.: *Would the Project be subject to seismic-related ground failure, including liquefaction?*

Seismically-induced liquefaction is a phenomenon in which cyclic stresses, produced by earthquake-induced ground motion, create excess pore pressures in soils. The soils may thereby acquire a high degree of mobility, and lead to lateral movement, sliding, sand boils, consolidation and settlement of loose sediments, and other damaging deformations. This phenomenon occurs only below the water table; but after liquefaction has developed, it can propagate upward into overlying, non-saturated soil as excess pore water dissipates. Typically, liquefaction has a relatively low potential at depths greater than 45 feet and is virtually unknown below a depth of 60 feet. (GeoSoils, 2003a, p. 11)

The condition of liquefaction has two principal effects. One is the consolidation of loose sediments with resultant settlement of the ground surface. The other effect is lateral sliding. Significant permanent lateral movement generally occurs only when there is significant differential loading, such as fill on natural ground slopes. Liquefaction susceptibility is related to numerous factors and the following conditions should be



present for liquefaction to occur: 1) sediments must be relatively young in age and not have developed a large amount of cementation; 2) sediments generally consist of medium to fine grained, relatively cohesionless sands; 3) the sediments must have low relative density; 4) free groundwater must be present in the sediment; and 5) the site must experience a seismic event of a sufficient duration and magnitude, to induce straining of soil particles. (GeoSoils, 2003a, p. 10)

Based on site observations and subsurface investigations conducted by GeoSoils in 2003, there was no evidence of upward-directed hydraulic force that was suddenly applied, and was of short duration, nor were there any features commonly caused by seismically induced liquefaction, such as dikes, sills, vented sediments, lateral spreads, or soft-sediment deformation. In addition, mottled soils were not noted during the subsurface investigation, which also indicates the absence of high groundwater levels historically. These features would be expected if the site area had been subject to liquefaction in the past. Inasmuch as the future performance of the site with respect to liquefaction should be similar to the past, excluding the effects of urbanization (irrigation), GeoSoils concluded that the site generally has not been subject to liquefaction in the geologic past, regardless of the depth of the localized water table. (GeoSoils, 2003a, pp. 10-11)

Based on the absence of a shallow groundwater table in the older fan deposits, the dense to very dense nature of the older fan, the potential for liquefaction and for seismic (i.e., dynamic) settlement, in the form of dry sand settlement, are anticipated to be very low. (Petra, 2020, p. 8) Site-specific geotechnical evaluations would be required for future implementing developments within the Project site (i.e., tentative tract maps, plot plans, etc.). Grading plans would be required for future implementing developments, and proposed grading plans would be required to incorporate the recommendations of the future-required site-specific geotechnical evaluations. However, a significant impact due to localized liquefaction hazards could occur if future developments failed to incorporate the site-specific recommendations of the future-required geotechnical studies. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required.

Threshold d.: Would the Project 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?

Landslide Hazards

Indications of existing slope instability, including deep-seated landsliding, slope creep, or significant surficial failures on the site were not observed as part of previous geotechnical evaluations conducted on the Project site. However, small localized features (i.e., slumps, slopewash, etc.), were noted on the existing slopes/cliffs associated with the incised canyon drainage courses, in the north and northeastern portions of the site. These small slumps are anticipated to lie outside of the areas proposed for development, and/or would be completely removed by the proposed grading. (Riverside County, 2004, p. II-29) Nonetheless, impacts could occur if proposed slopes are not constructed in accordance with the site-specific recommendations of the future-required geotechnical studies. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required.



Lateral Spreading

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope towards a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements and such movement typically damages pipelines, utilities, bridges, and structures. Due to the low probability of liquefaction to occur on site, the potential for lateral spreading is also considered low (Petra, 2020, p. 8). Nonetheless, impacts could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required.

Collapse Hazards

A geotechnical factor affecting the Project site is the presence of porous, dry, and compressible near-surface undocumented fills, topsoil/colluvium, alluvial soils, and weathered terrace deposits. Such materials in their present state are not considered suitable for support of fill or structural loads. (Petra, 2020, p. 8) Impacts due to collapse hazards could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required.

Rockfall Hazards

A rockfall is a fragment of rock, or block of rocks, that detaches from a vertical to sub-vertical cliff or bluff in a downward motion. Under existing conditions, the Project site and surrounding areas do not contain any significant areas of boulder outcrops. As such, the Project site is not be subject to rockfall hazards. Notwithstanding, impacts due to rockfall hazards could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required.

***Threshold e.:* Would the Project 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?**

A review of the available literature conducted by GeoSoils did not indicate that the site area is subsiding due to down-faulting along bordering fault zones, groundwater withdrawal, or hydrocompaction. Field investigations and review of aerial photographs showed no features generally associated with areal subsidence (i.e., radially-directed drainages flowing into depressions, linearity of depressions associated with mountain fronts, or ground fissures). Ground fissures are generally associated with excessive groundwater withdrawal and associated subsidence, or regional neotectonics. The review conducted by GeoSoils did not indicate that excessive groundwater withdrawal in the site vicinity is occurring at this time, and faults are not known to transect the property. As such, and given the dense nature of the Quaternary fan deposits, regional groundwater



withdrawal is not anticipated to adversely impact the Project site. (GeoSoils, 2003a, p. 11; GeoSoils, 2003b, p. 12)

Local ground subsidence may occur over the site because of equipment working (vibrations). Such subsidence depends upon the equipment used and on the dynamic effects of the equipment. Given that the site is underlain by dense Quaternary fan deposits, the amount of such subsidence would be minimal. GeoSoils estimates that local ground subsidence due to vibration/loading during grading would be less than 0.15 feet, but would depend on haul routes, etc. (GeoSoils, 2003a, p. 11; GeoSoils, 2003b, p. 12)

Notwithstanding, impacts due to subsidence hazards could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required.

Threshold f.: Would the Project be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?

There are no volcanoes in the Project region; thus, no impacts due to volcanic hazards would occur.

A seiche is an underwater wave that oscillates through a body of water which may be triggered by earthquakes or landslides. In general, seiches are small (on the order of a few inches) and are present in larger lakes as a result of the depth, temperature, and contours of the body of water. Due to the lack of an onsite body of water or other bodies of water within close proximity to the site that have the potential to result in site inundation, the potential for the subject site to be impacted by seiches is considered low. As such, impacts due to seiches would be less than significant.

Mass wasting refers to the various processes by which earth materials are moved down slope in response to the force of gravity. Indications of deep-seated landsliding, slope creep, or significant surficial failures on the site were not observed during site reconnaissance and geologic mapping conducted by GeoSoils in 2003. However, small localized features (i.e., slumps, slopewash, etc.) were noted on the existing slopes associated with the incised canyon drainage courses, in the northeastern portion of the site, as well as in the existing slopes/cliffs associated with the incised canyon drainage courses, in the northwestern portion of the site. These small slumps are anticipated to lie outside of the areas proposed for development, and/or would be completely removed by the proposed grading. Notwithstanding, there is a potential for the Project to result in increased hazards associated with mudflow if the recommendations of future-required geotechnical evaluations are not incorporated into the design of future development. This is evaluated as a potentially significant impact for which mitigation would be required. (GeoSoils, 2003a, pp. 10-11; GeoSoils, 2003b, pp. 11-12)

With respect to mudflow hazards potentially affecting future development on the Project site, areas to the west and south of the Project site are developed with residential uses and there is very little potential for mudflow hazards in these areas. Areas to the east and north of the Project site occur at a lower elevation relative to the



Project site, and thus have no potential to affect the Project site with potential mudflow hazards. Accordingly, impacts due to mudflow hazards associated with off-site areas would be less than significant.

Threshold g.: Would the Project change topography or ground surface relief features?

Threshold h.: Would the Project create cut or fill slopes greater than 2:1 or higher than 10 feet?

Due to the undulating topography of the Project site, as well as the presence of existing slopes along the western and southern boundaries of the Project site, extensive grading activities would be required to establish development pads. While precise grading plans would be developed in conjunction with future implementing developments (i.e., plot plans, etc.), retaining/geo-grid walls are anticipated to be used across the site and these walls may range in height from 0 to 30 feet, and in some instances may exceed 50 feet in height. Additionally, it is possible that future implementing developments may propose or require slopes exceeding 10 feet in height or at a slope angle greater than 2:1. If such slopes are proposed, the slopes would be subject to evaluation as part of the geotechnical studies required for future implementing development on site (e.g., tentative tract maps, plot plans, etc.). Notwithstanding, a potentially significant impact would occur due to the proposed retaining/geo-grid walls, slopes greater than 2:1, and/or slopes higher than 10 feet if future implementing projects were to fail to incorporate the recommendations of the future-required geotechnical evaluations. This is evaluated as a potentially significant impact for which mitigation would be required.

Threshold i.: Would the Project result in grading that affects or negates subsurface sewage disposal systems?

Threshold l.: Would the Project 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?

According to the Project's Phase I Environmental Site Assessment (EIR *Technical Appendix G*), and based upon the historic and present property use, septic tanks (systems) may exist on the property. A significant impact could occur if the any buried septic systems are not properly removed or abandoned following health department guidelines.

SP 333A1 includes a Conceptual Sewer Plan (refer to EIR Figures 3-8 and 3-9) that would involve the construction of sewer lines, force mains, and/or sewer lift stations to convey wastewater generated by the Project to the existing Horsethief Canyon Water Reclamation Facility (WRF), located off-site immediately west of the Project site. The Project Applicant does not propose any septic tanks or alternative waste water disposal systems. As such, no impact associated with septic tanks or alternative waste water disposal systems would occur.



Threshold j.: Would the Project result in substantial soil erosion or the loss of topsoil?

Threshold m.: Would the Project be impacted by or result in an increase in wind erosion and blow sand, either on or off site?

Implementation of the Project has the potential to result in soil erosion. The analysis below summarizes the likelihood of the Project to result in substantial soil erosion during temporary construction activities and long-term operation.

Construction-Related Impacts

Proposed grading and construction activities at the Project site would expose underlying soils and disturb surficial soils. Exposed soils would be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water.

Pursuant to the requirements of the State Water Resources Control Board, the Project Applicant is required to obtain a NPDES permit for construction activities, including proposed grading. The NPDES permit is required for all projects that include construction activities such as clearing, grading, and/or excavation that disturb at least one (1) acre of total land area. The County’s Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the Project Applicant to prepare and submit to the County for approval a Project-specific SWPPP. The SWPPP would identify a combination of erosion control and sediment control measure (i.e., Best Management Practices (BMPs)) to reduce or eliminate sediment discharge to surface water from storm water and non-stormwater source discharges during construction.

In addition, proposed construction activities would be required to comply with SCAQMD Rule 403, which would reduce the amount of particulate matter in the air and minimize the potential for wind erosion. Rule 403 requires that certain construction practices be following that limit dust and dirt from leaving the construction site. For example, no dust is allowed to be tracked out of the site by more than 25 feet. In addition, proposed construction activities would be required to comply with applicable County ordinances (i.e., Ordinance Nos. 457 and 460) to protect and enhance the water quality of the County, which requires the Project Applicant to prepare an erosion control plan to be used during the rainy season. With mandatory compliance to the requirements noted in the Project’s SWPPP, as well as mandatory compliance to applicable regulatory requirements including but not limited to SCAQMD Rule 403, and Riverside County Ordinance Nos. 457 and 460, the potential for water and/or wind erosion impacts during Project construction would be reduced to less-than-significant levels.

Long-Term Operational Impacts

Following construction, wind and water erosion on the Project site would be minimized, as the disturbed areas would be landscaped or covered with impervious surfaces, and drainage would be controlled through a storm drain system. As discussed in detail in EIR Subsection 4.10, *Hydrology and Water Quality*, the Project is not anticipated to substantially increase the rate or amount of runoff leaving the site, as compared to existing conditions. Future implementing developments (e.g., tentative tract maps, plot plans, etc.) would be required to construct stormwater facilities (such as detention basins) to reduce on-site runoff flows to pre-development



conditions. As discussed in Subsection 4.10, construction of detention basins and water quality basins on-site would ensure that post-development rates and amounts of runoff are similar or slightly reduced as compared to those occurring under existing conditions. Accordingly, implementation of the Project would not increase the risk of siltation or erosion in stormwater discharged from the Project site. In addition, Water Quality Management Plans (WQMPs) would be required for future implementing developments within the Project site, which would identify post-construction measures to ensure on-going protection against erosion. Compliance with the WQMP would be required as a condition of approval for future implementing developments, and long-term maintenance of on-site water quality features also would be required. Based on the foregoing, implementation of the Project would not significantly increase the risk of long-term wind or water erosion on- or off-site, and impacts would be less than significant.

Threshold k.: Would the Project be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), creating substantial risks to life or property?

According to the Project's Geotechnical Update Report (*Technical Appendix F1*), on-site soils have an expansion rating ranging from very low to medium. However, results of expansion testing at finish grades would need to be utilized to confirm final foundation design. Accordingly, impacts due to expansive soils could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required.

4.7.5 CUMULATIVE IMPACT ANALYSIS

With exception of erosion hazards, potential geologic and soils effects are inherently restricted to the areas proposed for development and would not contribute to cumulative impacts associated with other existing, planned, or proposed development. That is, thresholds including fault rupture, seismic ground shaking, liquefaction, landslides, expansive soils, and other geologic hazards would involve effects to (and not from) the proposed development, and are specific to on-site conditions. Accordingly, addressing these potential hazards for the proposed development would involve using measures to conform to existing requirements, and/or site-specific design and construction efforts that have no relationship to, or impact on, off-site areas. Because of the site-specific nature of these potential hazards and the measures to address them, there would be no connection to similar potential issues or cumulative effects to or from other properties. Cumulatively-considerable impacts would be less than significant.

As discussed under Thresholds j. and m., during both near-term construction and long-term operation, measures would be incorporated into the Project's design to ensure that significant erosion hazards do not occur. Other developments within the cumulative study area would be required to comply with similar requirements, such as the need to obtain an NPDES permit and mandatory compliance with the resulting SWPPPs. All projects in the cumulative study area also would be required to demonstrate that measures have been incorporated to ensure that development does not result in substantial increases in the amount or rate of runoff under long-term operating conditions, which could in turn increase soil erosion. Further, all projects in the cumulative study area also would be required to comply with Riverside County Ordinance Nos. 457 and 460, as well as SCAQMD Rule 403, which would preclude water- and wind-related erosion hazards during



construction. Therefore, because the Project site would result in less-than-significant erosion impacts, and because other projects within the cumulative study area would be subject to similar requirements to control erosion hazards during construction and long-term operation, cumulatively-considerable impacts associated with wind and water erosion hazards are evaluated as less than significant.

4.7.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Thresholds a. & c.: Significant Direct Impact. The Project site is not subject to fault hazards, as none occur on site. However, the Project as evaluated herein is limited to changes in the land use designations and zoning classifications for the 157.1-acre Project site. Site-specific geotechnical evaluations would be required for future implementing developments within the Project site (i.e., tentative tract maps, plot plans, etc.). Grading plans would be required for future implementing developments, and proposed grading plans would be required to incorporate the recommendations of the future-required site-specific geotechnical evaluations. However, a significant impact due to strong seismic ground shaking could occur if future developments failed to incorporate the site-specific recommendations of the future-required geotechnical studies.

Threshold b.: Significant Direct Impact. Based on the absence of a shallow groundwater table in the older fan deposits, the dense to very dense nature of the older fan, the potential for liquefaction and for seismic (i.e., dynamic) settlement, in the form of dry sand settlement, are anticipated to be very low. However, a significant impact due to localized liquefaction hazards could occur if future developments failed to incorporate the site-specific recommendations of the future-required geotechnical studies. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required.

Threshold d.: Significant Direct Impact. Impacts due to landslide hazards, lateral spreading, collapse hazards, and rockfall hazards could occur if proposed grading is not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies.

Threshold e.: Significant Direct Impact. Impacts due to subsidence hazards could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies.

Threshold f.: Significant Direct Impact. The Project site is not subject to volcanic hazards or hazards associated with seiches. Additionally, due to existing development to the west and south of the Project site, and the lower elevation of properties located to the north and east of the Project site, the Project site is not subject to mudflow hazards associated with surrounding properties. However, there is a potential for the Project to result in increased hazards associated with mudflow if the recommendations of future-required geotechnical evaluations are not incorporated into the design of future development. This is evaluated as a potentially significant impact for which mitigation would be required.

Thresholds g. and h.: Significant Direct Impact. Due to the undulating topography of the Project site, as well as the presence of existing slopes along the western and southern boundaries of the Project site, extensive grading activities would be required to establish development pads. While precise grading plans would be



developed in conjunction with future implementing developments (i.e., plot plans, etc.), retaining/geo-grid walls are anticipated to be used across the site and these walls may range in height from 0 to 30 feet, and in some instances may exceed 50 feet in height. Additionally, it is possible that future implementing developments may propose or require slopes exceeding 10 feet in height or at a slope angle greater than 2:1. A potentially significant impact would occur due to the proposed retaining/geo-grid walls, slopes greater than 2:1, and/or slopes higher than 10 feet if future implementing projects were to fail to incorporate the recommendations of the future-required geotechnical evaluations. This is evaluated as a potentially significant impact for which mitigation would be required.

Thresholds i. and l: Significant Direct Impact. The Project Applicant does not propose any septic tanks or alternative waste water disposal systems, as sewer service to the Project site would be accommodated by the proposed sewer lines, force mains, and/or sewer lift stations that would convey sewer flows to the Horsethief Canyon WRF. However, based upon the historic and present property use, septic tanks (systems) may exist on the property. This is evaluated as a significant impact for which mitigation would be required.

Thresholds j. and m.: Less-than-Significant Impact. The Project would not result in substantial soil erosion or loss of topsoil. The Project Applicant would be required to obtain a NPDES permit for construction activities and adhere to a SWPPP as well as SCAQMD Rule 403 and Riverside County Ordinance Nos. 457, and 460. With mandatory compliance to these regulatory requirements, the potential for water and wind erosion impacts during construction would be less than significant. Following development, wind and water erosion on the Project site would be minimized, as the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. Furthermore, the Project is required by law to implement a WQMP during operation, which would preclude substantial erosion impacts in the long-term.

Threshold k.: Significant Direct Impact. Impacts due to expansive soils could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies.

4.7.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- The Project is required to comply with the provisions of County Ordinance Nos. 457, 460, and 547. Ordinance No. 457 requires that all projects comply with California Building Codes and the International Building Codes. These codes establish site-specific investigation requirements, construction standards, and inspection procedures to ensure that development does not pose a threat to the health, safety, and welfare of the public, and includes requirements related to erosion. Ordinance No. 460 sets forth soil erosion control requirements and requires preparation and implementation of a



wind erosion control plan. In addition, Ordinance No. 547 requires that cases where a proposed project falls within an earthquake fault zone as shown on the maps prepared by the State Geologist, this Ordinance requires compliance with all of the provisions of the Alquist-Priolo Act and the adopted policies and criteria of Ordinance No. 547.

- The Project is required to comply with the provisions of SCAQMD Rule 403, by addressing blowing dust from the Project's construction activities.
- The Project is required to comply with the provisions of the Project's National Pollution Discharge Elimination System (NPDES) permit, and the Project's Storm Water Pollution Prevention Plan (SWPPP). Compliance with the NPDES permit and the SWPPP would identify and implement an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate discharge to surface water from stormwater and non-stormwater discharges.

Mitigation

MM 4.7-1 Prior to approval of any future implementing developments within the 157.1-acre Project site (e.g., tentative tract maps, plot plans, etc.), updated site-specific geotechnical studies shall be prepared to evaluate grading and site work proposed as part of the future implementing developments. The future-required geotechnical studies shall be reviewed by the County Geologist for conformance with all applicable State and County requirements. All future implementing projects shall be conditioned to require that the site-specific recommendations of the implementing geotechnical evaluations shall be incorporated into future grading and building permit applications. Future grading or building permits shall not be issued by the County unless the investigations required by Riverside County Ordinance Nos. 457 and 547 have been completed and the site-specific recommendations have been incorporated into the design of grading and/or building permits, as appropriate.

MM 4.7-2 As a condition of grading permit issuance, any septic systems identified on site as part of the future-required geotechnical studies shall be removed in accordance with the standards and requirements of the Riverside County Department of Environmental Health (DEH).

4.7.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Thresholds a. & c.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address seismic-related hazards in conformance with the CBSC and the Riverside County Building Code. With implementation of the required mitigation, impacts due to strong seismic ground shaking would be reduced to less-than-significant levels.

Threshold b.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or



building permit applications to address any localized liquefaction hazards that may be identified in areas subject to grading and development. With implementation of the required mitigation, impacts due to liquefaction hazards would be reduced to less-than-significant levels.

Threshold d.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address the potential for landslide hazards, lateral spreading, collapse hazards, and rockfall hazards. With implementation of the required mitigation, impacts due to landslide hazards would be reduced to less-than-significant levels.

Threshold e.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address potential subsidence hazards. With implementation of the required mitigation, impacts due to subsidence hazards would be reduced to less-than-significant levels.

Threshold f.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address potential mudflow hazards. With implementation of the required mitigation, impacts due to mudflow hazards would be reduced to less-than-significant levels.

Thresholds g. and h.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to ensure that any slopes higher than 10 feet or at a gradient steeper than 2:1 would be grossly stable. With implementation of the required mitigation, impacts associated with unstable slopes would be reduced to less-than-significant levels.

Thresholds i. and l.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-2 would ensure that any septic tanks that may be present on site are appropriately removed from the Project site in accordance with Riverside County DEH requirements. Implementation of the required mitigation would reduce potential impacts associated with existing septic tanks on site to less-than-significant levels.

Threshold k.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address expansive soils on site. With implementation of the required mitigation, impacts associated with expansive soils would be reduced to less-than-significant levels.



4.8 GREENHOUSE GAS EMISSIONS

The analysis in this Subsection is based in part on a greenhouse gas (GHG) analysis prepared as part of the Project's Air Quality Assessment (AQA), which is entitled, "Air Quality & Greenhouse Gas Assessment, Renaissance Ranch Project," prepared by ECORP Consulting, Inc. (herein, "ECORP"), and dated March 2021 (ECORP, 2021a). The AQA is included as *Technical Appendix B* to this EIR. Refer to Section 7.0, *References*, for a complete list of reference sources.

4.8.1 EXISTING CONDITIONS

A. Greenhouse Gas Setting

Certain gases in the earth's atmosphere, classified as Greenhouse Gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the Earth's surface and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the Earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the Earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead trapped, resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth. Without the greenhouse effect, the earth would not be able to support life as we know it. (ECORP, 2021a, pp. 51-52)

Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Fluorinated gases include chlorofluorocarbons, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride; however, it is noted that these gases are not associated with typical land use development. Human-caused emissions of these GHGs in excess of natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change or global warming. It is "extremely likely" that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in GHG concentrations and other anthropogenic factors together. (ECORP, 2021a, p. 52)

Table 4.8-1, *Greenhouse Gases*, describes the primary GHGs attributed to global climate change, including their physical properties, primary sources, and contributions to the greenhouse effect. Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. CH₄ traps over 25 times more heat per molecule than CO₂, and N₂O absorbs 298 times more heat per molecule than CO₂. Often, estimates of GHG emissions are presented in carbon dioxide equivalents (CO₂e), which weigh each gas by its global warming potential. Expressing GHG emissions in CO₂e takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO₂ were being emitted. (ECORP, 2021a, p. 52)



Table 4.8-1 Greenhouse Gases

Greenhouse Gas	Description
CO ₂	Carbon dioxide is a colorless, odorless gas. CO ₂ is emitted in a number of ways, both naturally and through human activities. The largest source of CO ₂ emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, industrial facilities, and other sources. A number of specialized industrial production processes and product uses such as mineral production, metal production, and the use of petroleum-based products can also lead to CO ₂ emissions. The atmospheric lifetime of CO ₂ is variable because it is so readily exchanged in the atmosphere. ¹
CH ₄	Methane is a colorless, odorless gas and is the major component of natural gas, about 87 percent by volume. It is also formed and released to the atmosphere by biological processes occurring in anaerobic environments. Methane is emitted from a variety of both human-related and natural sources. Human-related sources include fossil fuel production, animal husbandry (intestinal fermentation in livestock and manure management), rice cultivation, biomass burning, and waste management. These activities release significant quantities of CH ₄ to the atmosphere. Natural sources of CH ₄ include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, non-wetland soils, and other sources such as wildfires. The atmospheric lifetime of CH ₄ is about 12 years. ²
N ₂ O	Nitrous oxide is a clear, colorless gas with a slightly sweet odor. Nitrous oxide is produced by both natural and human-related sources. Primary human-related sources of N ₂ O are agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuels, adipic acid production, and nitric acid production. N ₂ O is also produced naturally from a wide variety of biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N ₂ O is approximately 120 years. ³

(ECORP, 2021a, Table 3-1)

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and Toxic Air Contaminants (TACs), which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric lifetimes (one to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of any particular GHG molecule is dependent on multiple variables and cannot be pinpointed, it is understood that more CO₂ is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms. Of the total annual human-caused CO₂ emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO₂ emissions remains stored in the atmosphere. (ECORP, 2021a, p. 52)

The quantity of GHGs that it takes to ultimately result in climate change is not precisely known; it is sufficient to say the quantity is enormous, and no single project alone would measurably contribute to a noticeable incremental change in the global average temperature or to global, local, or microclimates. From the standpoint of CEQA, GHG impacts to global climate change are inherently cumulative. (ECORP, 2021a, p. 53)

B. Sources of Greenhouse Gas Emissions

In 2020, the California Air Resources Board (CARB) released the 2020 edition of the California GHG inventory covering calendar year 2018 emissions. In 2018, California emitted 425.3 million gross metric tons of CO₂e including from imported electricity. Combustion of fossil fuel in the transportation sector was the single largest source of California’s GHG emissions in 2018, accounting for approximately 30 percent of total



GHG emissions in the state. This sector was followed by the industrial sector (21 percent) and the electric power sector including both in-state and out-of-state sources (15 percent). Emissions of CO₂ are byproducts of fossil fuel combustion. CH₄, a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. N₂O is also largely attributable to agricultural practices and soil management. Carbon dioxide sinks, or reservoirs, include vegetation and the ocean, which absorb CO₂ through sequestration and dissolution (CO₂ dissolving into the water), respectively, two of the most common processes for removing CO₂ from the atmosphere. (ECORP, 2021a, p. 53)

4.8.2 APPLICABLE ENVIRONMENTAL REGULATIONS

The following is a brief description of the international, federal, State, and local environmental laws and related regulations related to GHG emissions.

A. *International Regulations*

1. *Kyoto Protocol*

The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change, which commits its Parties by setting internationally binding emission reduction targets. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities." (UNFCCC, n.d.)

The Kyoto Protocol was adopted in Kyoto, Japan, on December 11, 1997 and entered into force on February 16, 2005. The detailed rules for the implementation of the Protocol were adopted at Conference of the Parties (COP) 7 in Marrakesh, Morocco, in 2001, and are referred to as the "Marrakesh Accords." Its first commitment period started in 2008 and ended in 2012. (UNFCCC, n.d.)

On December 8, 2012, in Doha, Qatar, the "Doha Amendment to the Kyoto Protocol" was adopted. The amendment includes:

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from January 1, 2013 to December 31, 2020;
- A revised list of greenhouse gases (GHG) to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period. (UNFCCC, n.d.)

On December 21, 2012, the amendment was circulated by the Secretary-General of the United Nations, acting in his capacity as Depositary, to all Parties to the Kyoto Protocol in accordance with Articles 20 and 21 of the Protocol. (UNFCCC, n.d.)



During the first commitment period, 37 industrialized countries and the European Community committed to reduce GHG emissions to an average of five percent against 1990 levels. During the second commitment period, Parties committed to reduce GHG emissions by at least 18 percent below 1990 levels in the eight-year period from 2013 to 2020; however, the composition of Parties in the second commitment period is different from the first. (UNFCCC, n.d.)

2. *The Paris Agreement*

The Paris Agreement builds upon the Convention and – for the first time – brings all nations into a common cause to undertake ambitious efforts to combat climate change and adapt to its effects, with enhanced support to assist developing countries to do so. As such, it charts a new course in the global climate effort. (UNFCCC, n.d.)

The Paris Agreement’s central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. Additionally, the agreement aims to strengthen the ability of countries to deal with the impacts of climate change. To reach these ambitious goals, appropriate financial flows, a new technology framework and an enhanced capacity building framework will be put in place, thus supporting action by developing countries and the most vulnerable countries, in line with their own national objectives. The Agreement also provides for enhanced transparency of action and support through a more robust transparency framework. (UNFCCC, n.d.)

The Paris Agreement requires all Parties to put forward their best efforts through “nationally determined contributions” (NDCs) and to strengthen these efforts in the years ahead. This includes requirements that all Parties report regularly on their emissions and on their implementation efforts. (UNFCCC, n.d.)

In 2018, Parties will take stock of the collective efforts in relation to progress towards the goal set in the Paris Agreement and to inform the preparation of NDCs. There will also be a global stock-taking every five years to assess the collective progress towards achieving the purpose of the Agreement and to inform further individual actions by Parties. (UNFCCC, n.d.)

The Paris Agreement entered into force on November 4, 2016, thirty days after the date on which at least 55 Parties to the Convention accounting in total for at least an estimated 55% of the total global greenhouse gas emissions have deposited their instruments of ratification, acceptance, approval, or accession with the Depositary. (UNFCCC, n.d.)

B. Federal Regulations

1. Clean Air Act

Coinciding with the 2009 meeting of international leaders in Copenhagen, on December 7, 2009, the EPA issued an Endangerment Finding under § 202(a) of the Clean Air Act (CAA), opening the door to federal regulation of GHGs. The Endangerment Finding notes that GHGs threaten public health and welfare and are



subject to regulation under the CAA. To date, the EPA has not promulgated regulations on GHG emissions, but it has begun to develop them. (EPA, n.d.; DOJ, 2015)

Previously the EPA had not regulated GHGs under the CAA because it asserted that the Act did not authorize it to issue mandatory regulations to address Global Climate Change (GCC) and that such regulation would be unwise without an unequivocally established causal link between GHGs and the increase in global surface air temperatures. In *Massachusetts v. Environmental Protection Agency et al.* (127 S. Ct. 1438 [2007]); however, the U.S. Supreme Court held that GHGs are pollutants under the CAA and directed the EPA to decide whether the gases endangered public health or welfare. The EPA had also not moved aggressively to regulate GHGs because it expected Congress to make progress on GHG legislation, primarily from the standpoint of a cap-and-trade system. However, proposals circulated in both the House of Representative and Senate have been controversial and it may be some time before the U.S. Congress adopts major climate change legislation. The EPA's Endangerment Finding paves the way for federal regulation of GHGs with or without Congress. (EPA, n.d.; DOJ, 2015)

C. State Regulations

1. Title 24 Building Energy Standards

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The latest revisions (2016 Building Energy Efficiency Standards) became effective on January 1, 2017. The 2016 Building Energy Efficiency Standards are 28 percent more efficient than the previous (2013) Building Energy Efficiency Standards for residential construction and 5 percent more efficient than the previous Standards for non-residential construction. (The 2013 Building Energy Efficiency Standards already were 25 percent more efficient for residential construction and 30 percent more efficient for nonresidential construction than the 2008 Building Energy Efficiency Standards they replaced.) (CEC, 2018)

Part 11 of Title 24 is referred to as the California Green Building Standards Code (CALGreen Code). The purpose of the CALGreen Code is to “improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality.” The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). Unless otherwise noted in the regulation, all newly constructed buildings in California are subject of the requirements of the CALGreen Code. (CEC, 2018)



2. *California Assembly Bill No. 1493 (AB 1493)*

AB 1493 required CARB to adopt the nation's first GHG emission standards for automobiles. On September 24, 2009, CARB adopted amendments to the "Pavley" regulations that reduce greenhouse gas (GHG) emissions in new passenger vehicles from model year 2009 through 2016. These amendments were part of California's commitment toward a nation-wide program to reduce new passenger vehicle GHGs from 2012 through 2016. CARB's September amendments cement California's enforcement of the Pavley rule starting in 2009 while providing vehicle manufacturers with new compliance flexibility. The amendments also prepare California to harmonize its rules with the federal rules for passenger vehicles. (CARB, n.d.)

The U.S. EPA granted California the authority to implement GHG emission reduction standards for new passenger cars, pickup trucks, and sport utility vehicles On June 30, 2009. The first California request to implement GHG standards for passenger vehicles, known as a waiver request, was made in December 2005, and was denied by the EPA in March 2008. That decision was based on a finding that California's request to reduce GHG emissions from passenger vehicles did not meet the CAA requirement of showing that the waiver was needed to meet "compelling and extraordinary conditions." (CARB, n.d.)

CARB's Board originally approved regulations to reduce GHGs from passenger vehicles in September 2004, with the regulations to take effect in 2009. These regulations were authorized by the 2002 legislation Assembly Bill 1493 (Pavley). (CARB, n.d.)

The regulations had been threatened by automaker lawsuits and were stalled by the EPA's delay in reviewing and then initially denying California's waiver request. The parties involved entered a May 19, 2009 agreement to resolve these issues. With the granting of the waiver on June 30, 2009, it is expected that the Pavley regulations reduced GHG emissions from California passenger vehicles by about 22 percent in 2012 and about 30 percent in 2016, all while improving fuel efficiency and reducing motorists' costs. (CARB, n.d.)

The CARB has adopted a new approach to passenger vehicles – cars and light trucks – by combining the control of smog-causing pollutants and greenhouse gas emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California. (CARB, n.d.)

3. *Executive Order S-3-05*

Executive Order (EO) S-3-05 documents GHG emission reduction goals, creates the Climate Action Team and directs the Secretary of the California EPA to coordinate efforts with meeting the GHG reduction targets with the heads of other state agencies. The EO requires the Secretary to report back to the Governor and Legislature biannually to report: progress toward meeting the GHG goals; GHG impacts to California; and applicable Mitigation and Adaptation Plans. EO S-3-05 goals for GHG emissions reductions include: reducing GHG emissions to 2000 levels by the year 2010; reducing GHG emissions to 1990 levels by the year 2020; and reducing GHG emissions to 80 percent below 1990 levels by 2050.



4. California Assembly Bill 32 – Global Warming Solutions Act of 2006

In September 2006, Governor Schwarzenegger signed Assembly Bill 32 (AB 32), the California Climate Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020, which represents a reduction of approximately 15 percent below emissions expected under a “business as usual” scenario. Pursuant to AB 32, the CARB must adopt regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. The full implementation of AB 32 will help mitigate risks associated with climate change, while improving energy efficiency, expanding the use of renewable energy resources, cleaner transportation, and reducing waste. (CARB, 2018)

AB 32 specifically required that CARB do the following: (CARB, 2018)

- Prepare and approve a Scoping Plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions from sources or categories of sources of GHGs by 2020, and update the Scoping Plan every five years.
- Maintain and continue reductions in emissions of GHG beyond 2020.
- Identify the statewide level of GHG emissions in 1990 to serve as the emissions limit to be achieved by 2020.
- Identify and adopt regulations for discrete early actions that could be enforceable on or before January 1, 2010.
- Adopt a regulation that establishes a system of market-based declining annual aggregate emission limits for sources or categories of sources that emit GHG emissions.
- Convene an Environmental Justice Advisory Committee to advise the Board in developing and updating the Scoping Plan and any other pertinent matter in implementing AB 32.
- Appoint an Economic and Technology Advancement Advisory Committee to provide recommendations for technologies, research, and GHG emission reduction measures.

In November 2007, CARB completed its estimated calculations of Statewide 1990 GHG levels. Net emission 1990 levels were estimated at 427 million metric tons (MMTs) (emission sources by sector were: transportation – 35 percent; electricity generation – 26 percent; industrial – 24 percent; residential – 7 percent; agriculture – 5 percent; and commercial – 3 percent). Accordingly, 427 million metric tons of carbon dioxide equivalent (MMT_{CO₂e}) equivalent was established as the emissions limit for 2020. For comparison, CARB’s estimate for baseline GHG emissions was 473 MMT_{CO₂e} for 2000 and without emissions reduction measures 2010 emissions were projected to be 532 MMT_{CO₂e}. “Business as usual” conditions (without the reductions to be implemented by CARB regulations) for 2020 were projected to be 596 MMT_{CO₂e}. (CARB, 2007)

AB 32 required CARB to develop a Scoping Plan which lays out California’s strategy for meeting the goals. The Scoping Plan must be updated every five years. In December 2008, CARB approved the initial Scoping Plan, which included a suite of measures to sharply cut GHG emissions. Table 4.8-2, *Scoping Plan GHG Reduction Measures Towards 2020 Target*, shows the proposed reductions from regulations and programs outlined in the Scoping Plan. While local government operations were not accounted for in achieving the Year 2020 emissions reduction, local land use changes are estimated to result in a reduction of 5 MMT_{CO₂e}, which is approximately 3 percent of the 2020 GHG emissions reduction goal. In recognition of the critical role local



governments will play in successful implementation of AB 32, CARB is recommending GHG reduction goals of 15 percent of 2006 levels by 2020 to ensure that municipal and community-wide emissions match the State's reduction target. According to the Measure Documentation Supplement to the Scoping Plan, local government actions and targets are anticipated to reduce vehicle miles by approximately 2 percent through land use planning, resulting in a potential GHG reduction of 2 MMTCO_{2e} (or approximately 1.2 percent of the GHG reduction target). (CARB, 2018)

Overall, CARB determined that achieving the 1990 emission level in 2020 would require a reduction in GHG emissions of approximately 28.5 percent in the absence of new laws and regulations (referred to as "Business-As-Usual" [BAU]). The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team (CAT) early actions and additional GHG reduction measures, identifies additional measures to be pursued as regulations, and outlines the role of the cap-and-trade program.

When the 2020 emissions level projection also was updated to account for implemented regulatory measures, including Pavley (vehicle model-years 2009 - 2016) and the renewable portfolio standard (12% - 20%), the 2020 projection in the BAU condition was reduced further to 507 metric tons of carbon dioxide equivalent (MTCO_{2e}). As a result, based on the updated economic and regulatory data, CARB determined that achieving the 1990 emissions level in 2020 would now only require a reduction of GHG emissions of 80 MTCO_{2e}, or approximately 16 percent (down from 28.5 percent), from the BAU condition.

In May 2014, CARB approved the First Update to the Climate Change Scoping Plan (Update), which builds upon the initial Scoping Plan with new strategies and recommendations. The Update highlights California's progress toward meeting the near-term 2020 GHG emission reduction goals, highlights the latest climate change science and provides direction on how to achieve long-term emission reduction goal described in Executive Order S-3-05. The Update recalculates 1990 GHG emissions using new global warming potentials identified in the IPCC Fourth Assessment Report released in 2007. Using those GWPs, the 427 MTCO_{2e} 1990 emissions level and 2020 GHG emissions limit identified in the 2008 Scoping Plan would be slightly higher, at 431 MTCO_{2e}. Based on the revised 2020 emissions level projection identified in the 2011 Final Supplement and the updated 1990 emissions levels identified in the discussion draft of the First Update, achieving the 1990 emissions level in 2020 would require a reduction of 78 MTCO_{2e} (down from 509 MTCO_{2e}), or approximately 15.3 percent (down from 28.5 percent), from the BAU condition. (CARB, 2018; CARB, 2017)

In November 2017, CARB adopted the Second Update to the Scoping Plan, which identifies the State's post-2020 reduction strategy. The Second Update reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Senate Bill (SB) 32. Key GHG emissions reductions programs that the draft Second Update proposes to build upon include the Cap-and-Trade Regulation, the Low Carbon Fuel Standard, and much cleaner cars, trucks and freight movement, utilizing cleaner, renewable energy, and strategies to reduce methane emissions from agricultural and other wastes. (CARB, 2017)



Table 4.8-2 Scoping Plan GHG Reduction Measures Towards 2020 Target

<i>Recommended Reduction Measures</i>	<i>Reductions Counted toward 2020 Target of 169 MMT CO2e</i>	<i>Percentage of Statewide 2020 Target</i>
Cap and Trade Program and Associated Measures		
California Light-Duty Vehicle GHG Standards	31.7	19%
Energy Efficiency	26.3	16%
Renewable Portfolio Standard (33 percent by 2020)	21.3	13%
Low Carbon Fuel Standard	15	9%
Regional Transportation-Related GHG Targets ¹	5	3%
Vehicle Efficiency Measures	4.5	3%
Goods Movement	3.7	2%
Million Solar Roofs	2.1	1%
Medium/Heavy Duty Vehicles	1.4	1%
High Speed Rail	1.0	1%
Industrial Measures	0.3	0%
Additional Reduction Necessary to Achieve Cap	34.4	20%
Total Cap and Trade Program Reductions	146.7	87%
Uncapped Sources/Sectors Measures		
High Global Warming Potential Gas Measures	20.2	12%
Sustainable Forests	5	3%
Industrial Measures (for sources not covered under cap and trade program)	1.1	1%
Recycling and Waste (landfill methane capture)	1	1%
Total Uncapped Sources/Sectors Reductions	27.3	16%
Total Reductions Counted toward 2020 Target	174	100%
Other Recommended Measures – Not Counted toward 2020 Target		
State Government Operations	1.0 to 2.0	1%
Local Government Operations	To Be Determined ²	NA
Green Buildings	26	15%
Recycling and Waste	9	5%
Water Sector Measures	4.8	3%
Methane Capture at Large Dairies	1	1%
Total Other Recommended Measures – Not Counted toward 2020 Target	42.8	NA

Source: CARB. 2008, MMTons CO2e: million metric tons of CO2e

¹Reductions represent an estimate of what may be achieved from local land use changes. It is not the SB 375 regional target.

²According to the Measure Documentation Supplement to the Scoping Plan, local government actions and targets are anticipated to reduce vehicle miles by approximately 2 percent through land use planning, resulting in a potential GHG reduction of 2 million metric tons of CO2e (or approximately 1.2 percent of the GHG reduction target). However, these reductions were not included in the Scoping Plan reductions to achieve the 2020 Target

5. California Senate Bill No. 1368 (SB 1368)

In 2006, the State Legislature adopted Senate Bill (SB) 1368 (Perata, Chapter 598, Statutes of 2006), which directs the California Public Utilities Commission (CPUC) to adopt a GHG emission performance standard (EPS) for the future power purchases of California utilities. SB 1368 seeks to limit carbon emissions associated



with electrical energy consumed in California by forbidding procurement arrangements for energy longer than five years from resources that exceed specified emissions criteria. Accordingly, SB 1368 effectively prevents California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. SB 1368 will lead to dramatically lower GHG emissions associated with California energy demand. (CEC, n.d.)

6. *Executive Order S-01-07*

Executive Order (EO) S-01-07 is effectively known as the Low Carbon Fuel Standard (LCFS). The Executive Order seeks to reduce the carbon intensity of California's passenger vehicle fuels by at least 10 percent by 2020. The LCFS requires fuel providers in California to ensure that the mix of fuel they sell into the California market meet, on average, a declining standard for GHG emissions measured in CO₂e grams per unit of fuel energy sold.

7. *Senate Bill 1078*

Senate Bill (SB) 1078 establishes the California Renewables Portfolio Standard Program, which requires electric utilities and other entities under the jurisdiction of the California Public Utilities Commission to meet 20% of their renewable power by December 31, 2017 for the purposes of increasing the diversity, reliability, public health, and environmental benefits of the energy mix.

8. *Senate Bill 107*

SB 107 directed California Public Utilities Commission's Renewable Energy Resources Program to increase the amount of renewable electricity (Renewable Portfolio Standard) generated per year, from 17% to an amount that equals at least 20% of the total electricity sold to retail customers in California per year by December 31, 2010.

9. *Executive Order S-14-08*

On November 17, 2008, Governor Schwarzenegger signed Executive Order S-14-08, revising California's existing Renewable Portfolio Standard (RPS) upward to require all retail sellers of electricity to serve 33% of their load from renewable energy sources by 2020. In order to meet this new goal, a substantial increase in the development of wind, solar, geothermal, and other "RPS eligible" energy projects will be needed. Executive Order S-14-08 seeks to accelerate such development by streamlining the siting, permitting, and procurement processes for renewable energy generation facilities. To this end, S-14-08 issues two directives: (1) the existing Renewable Energy Transmission Initiative will identify renewable energy zones that can be developed as such with little environmental impact, and (2) the CEC and the California Department of Fish and Wildlife (CDFW) will collaborate to expedite the review, permitting, and licensing process for proposed RPS-eligible renewable energy projects.



10. Senate Bill 97

By enacting SB 97 in 2007, California’s lawmakers expressly recognized the need to analyze GHGs as a part of the CEQA process. SB 97 required the Governor’s Office of Planning and Research (OPR) to develop, and the Natural Resources Agency to adopt, amendments to the State CEQA Guidelines addressing the analysis and mitigation of greenhouse gas emissions. Those State CEQA Guidelines amendments clarified several points, including the following: (CA Legislative Info, n.d.)

- Lead agencies must analyze the GHG emissions of proposed projects, and must reach a conclusion regarding the significance of those emissions. (See State CEQA Guidelines § 15064.4.)
- When a project’s GHG emissions may be significant, lead agencies must consider a range of potential mitigation measures to reduce those emissions. (See State CEQA Guidelines § 15126.4(c).)
- Lead agencies must analyze potentially significant impacts associated with placing projects in hazardous locations, including locations potentially affected by climate change. (See State CEQA Guidelines § 15126.2(a).)
- Lead agencies may significantly streamline the analysis of GHGs on a project level by using a programmatic GHG emissions reduction plan meeting certain criteria. (See State CEQA Guidelines § 15183.5(b).)
- CEQA mandates analysis of a proposed project’s potential energy use (including transportation-related energy), sources of energy supply, and ways to reduce energy demand, including through the use of efficient transportation alternatives. (See State CEQA Guidelines, Appendix F.)

As part of the administrative rulemaking process, the Natural Resources Agency developed a Final Statement of Reasons explaining the legal and factual bases, intent, and purpose of the State CEQA Guidelines amendments. The amendments to the State CEQA Guidelines implementing SB 97 became effective on March 18, 2010. (CA Legislative Info, n.d.)

Of note, the new guidelines state that a lead agency shall have discretion to determine whether to use a quantitative model or methodology, or in the alternative, rely on a qualitative analysis or performance based standards. Pursuant to State CEQA Guidelines § 15064.4(a), “A lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use; or (2) Rely on a qualitative analysis or performance based standards.” (CA Legislative Info, n.d.)

CEQA emphasizes that the effects of greenhouse gas emissions are cumulative, and should be analyzed in the context of CEQA’s requirements for cumulative impacts analysis. (See State CEQA Guidelines § 15130(f)).

§ 15064.4(b) of the guidelines provides direction for lead agencies for assessing the significance of impacts of greenhouse gas emissions:

1. The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;



2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; or
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must include specific requirements that reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The CEQA Guideline amendments do not identify a threshold of significance for GHG emissions, nor do they prescribe assessment methodologies or specific mitigation measures. Instead, they call for a “good-faith effort, based on available information, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project.” The amendments encourage lead agencies to consider many factors in performing a CEQA analysis and preserve lead agencies’ discretion to make their own determinations based upon substantial evidence. The amendments also encourage public agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. Specific GHG language incorporated in the Guidelines’ suggested Environmental Checklist (Guidelines Appendix G) is as follows:

VII. GREENHOUSE GAS EMISSIONS

Would the project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

11. Senate Bill 375

The Sustainable Communities and Climate Protection Act of 2008 (Sustainable Communities Act, SB 375, Chapter 728, Statutes of 2008) supports the State's climate action goals to reduce greenhouse gas (GHG) emissions through coordinated transportation and land use planning with the goal of more sustainable communities. (CARB, n.d.)

Under the Sustainable Communities Act, CARB sets regional targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established these targets for 2020 and 2035 for each region covered by one of the State's metropolitan planning organizations (MPO). CARB will periodically review and update the targets, as needed. (CARB, n.d.)

Each of California’s MPOs must prepare a "sustainable communities strategy" (SCS) as an integral part of its regional transportation plan (RTP). The SCS contains land use, housing, and transportation strategies that, if



implemented, would allow the region to meet its GHG emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. CARB must review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets. If the combination of measures in the SCS would not meet the regional targets, the MPO must prepare a separate "alternative planning strategy" (APS) to meet the targets. The APS is not a part of the RTP. (CARB, n.d.)

The Sustainable Communities Act also establishes incentives to encourage local governments and developers to implement the SCS or the APS. Developers can get relief from certain environmental review requirements under CEQA if their new residential and mixed-use projects are consistent with a region's SCS (or APS) that meets the targets (see Cal. Public Resources Code §§ 21155, 21155.1, 21155.2, 21159.28.). (CARB, n.d.)

12. *Executive Order B-30-15*

On April 29, 2015, Governor Brown issued Executive Order B-30-15, which sets a goal to reduce GHG emissions in California to 40 percent below 1990 levels by 2030. The 2030 target serves as a benchmark goal on the way to achieving the GHG reduction goal set by former Governor Schwarzenegger via Executive Order S-3-05 (i.e., 80 percent below 1990 greenhouse gas emissions levels by 2050).

13. *Senate Bill 32*

On September 8, 2016, Governor Jerry Brown signed the Senate Bill (SB) 32 and its companion bill, Assembly Bill (AB) 197. SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide greenhouse gas reduction target of 80% below 1990 levels by 2050. (CA Legislative Info, n.d.)

D. *Regional Regulations*

1. *Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*

The Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles.

SCAG's *2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS)*, also referred to as *Connect SoCal*, develops long-range regional transportation plans including a sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations and other plans for the region. The RTP/SCS provides objectives for meeting air pollution emissions reduction targets set forth by the California Air Resources Board (CARB);



these objectives were provided in direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. The Subregional Sustainable Communities Strategies identifies the Project Site as being located in an area with a “Standard Suburban” land use pattern, which is defined as auto-oriented development with a minimal mix of land uses.

The *Goods Movement Technical Report* of *Connect SoCal* recognizes that the SCAG region is the premier trade gateway for the United States. *Connect SoCal* acknowledges that the SCAG region has witnessed continued growth for warehousing, distribution, cold storage, and truck terminal facilities, with a majority of the growth for national and regional distribution facilities occurring in the Inland Empire. Through *Connect SoCal*, SCAG is working on various regional strategies to maintain the SCAG region as an important trade gateway while addressing regional transportation efficiency and environmental sustainability.

2. South Coast Air Quality Management District (SCAQMD)

To provide guidance to local lead agencies on determining significance for GHG emissions in CEQA documents, SCAQMD staff is convening an ongoing GHG CEQA Significance Threshold Working Group. Members of the working group include government agencies implementing CEQA and representatives from various stakeholder groups that provide input to SCAQMD staff on developing the significance thresholds. On October 8, 2008, the SCAQMD released the Draft AQMD Staff CEQA GHG Significance Thresholds. These thresholds have not been finalized and continue to be developed through the working group. (ECORP, 2021a, p. 56)

The *Draft AQMD Staff CEQA GHG Significance Thresholds* guidance document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association (CAPCOA), explored various approaches for establishing a significance threshold for GHG emissions and was described as a “work in progress” of efforts to date. However, the draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. In December 2008, the SCAQMD adopted an interim 10,000 metric tons of CO_{2e} per year (MTCO_{2e}/yr) screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency. From December 2008 to September 2010, SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal, issued in September 2010, used the following tiered approach to evaluate potential GHG impacts from various uses: (ECORP, 2021a, pp. 56-57)

- Tier 1: Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.
- Tier 2: Consider whether or not the proposed project is consistent with a locally-adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.



- Tier 3: Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MTCO₂e/yr threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MTCO₂e/yr), commercial projects (1,400 MTCO₂e/yr), and mixed-use projects (3,000 MTCO₂e/yr). Under option 2, a single numerical screening threshold of 3,000 MTCO₂e/yr would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.
- Tier 4: Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MTCO₂e/yr per service population for project level analyses and 6.6 MTCO₂e/yr per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.
- Tier 5: Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

The SCAQMD has not announced when staff is expecting to present a finalized version of its GHG thresholds to the governing board. These thresholds were developed as part of the SCAQMD GHG CEQA Significance Threshold Working Group. This working group was formed to assist SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research (OPR), CARB, the Attorney General's Office, a variety of city and county planning departments in the SCAB, various utilities such as sanitation and power companies throughout the SCAB, industry groups, and environmental and professional organizations. These thresholds were developed to be consistent with CEQA requirements for developing significance thresholds, are supported by substantial evidence, and provides guidance to CEQA practitioners with regard to determining whether GHG emissions from a proposed land use project are significant. (ECORP, 2021a, p. 57)

3. *Riverside County Climate Action Plan (CAP)*

The County of Riverside Climate Action Plan (CAP), which was adopted in December 2015 and most recently updated in November 2019, was designed under the premise that the County of Riverside, and the community it represents, is uniquely capable of addressing emissions associated with sources under Riverside County's jurisdiction, and that Riverside County's emission reduction efforts should coordinate with the state strategies of reducing emissions in order to accomplish these reductions in an efficient and cost-effective manner. The 2019 CAP Update establishes GHG emission reduction programs and regulations that correlate with and support evolving state GHG emissions reduction goals and strategies. The CAP Update includes reduction targets for year 2030 and year 2050. These reduction targets require the County to reduce emissions by at least 525,511 MTCO₂e/yr below the Adjusted Business As Usual (ABAU) scenario by 2030 and at least 2,982,948 MTCO₂e/yr below the ABAU scenario by 2050. To evaluate consistency with the CAP Update, the County has implemented CAP Update Screening Tables (Screening Tables) to aid in measuring the reduction of GHG



emissions attributable to certain design and construction measures incorporated in development projects. To this end, the Screening Tables establish categories of GHG Implementation Measures. Under each Implementation Measure category, mitigation or project design features (collectively “features”) are assigned point values that correspond to the minimum GHG emissions reduction that would result from each feature. Projects that yield at least 100 points are considered to be consistent with the GHG emissions reduction quantities anticipated in the County’s GHG Technical Report and support the GHG emissions reduction targets established under the CAP Update. The potential for such projects to generate direct or indirect GHG emissions that would result in a significant impact on the environment; or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG would be considered less than significant. (ECORP, 2021a, p. 60)

4. Riverside County Board of Supervisors Policy F-3

The logistics industry is a well-established sector of the Riverside County economy that has contributed to local job growth, fueled by societal growth trends in e-commerce and coupled with our strategic location along a major trade corridor that connects to the Ports of Los Angeles and Long Beach. It is expected that Riverside County will continue to see strong demand for growth in the logistics industry. However, it is also recognized that the construction and operations of logistics and warehouse projects in close proximity to residences or other sensitive land uses may negatively affect the quality of life of those existing communities. The County of Riverside Board of Supervisors Policy F-3, *Good Neighbor Policy for Logistics and Warehouse/Distribution Uses*, provides a framework through which large-scale logistics and warehouse projects, such as that proposed by the Project, can be designed and operated in a way that lessens their impact on surrounding communities and the environment. It is meant to apply Best Management Practices to help minimize potential impacts to sensitive receptors and is intended to be used in conjunction with the County’s Land Use Ordinance, which provides development requirements for said projects, and CEQA. This policy provides a series of development and operational criteria applicable to logistics and warehouse projects that include any building larger than 250,000 square feet in size that are implemented to supplement project-level mitigation measures in order to further reduce impacts related to logistics and warehousing development and operations. Pursuant to Mitigation Measure MM 4.3-7 in EIR Subsection 4.3, *Air Quality*, all future buildings within the Project site would be subject to applicable provisions of Policy F-3, regardless as to building size. The specific policy provisions germane to Project GHG emissions include the following: (ECORP, 2021a, pp. 59-60)

- 2.1 During construction of the warehouse/distribution facility, all heavy-duty haul trucks accessing the site shall have CARB-approved 2010 engines or newer approved CARB engine standards.
- 2.4 Construction contractors shall utilize construction equipment, with properly operating and maintained mufflers, consistent with manufacturers’ standards.
- 2.9 Construction Contractors shall prohibit truck drivers from idling more than five (5) minutes and require operators to turn off engines when not in use, in compliance with the California Air Resources Board regulations.
- 4.1 Facility operators shall maintain records of their fleet equipment and ensure that all diesel-fueled Medium-Heavy Duty Trucks (“MHDT”) and Heavy-Heavy Duty Trucks (“HHDT”) accessing the



site use year CARB 2010 or newer engines. The records should be maintained on-site and be made available for inspection by the County.

- 4.2 Facility operators shall prohibit truck drivers from idling more than five (5) minutes and require operators to turn off engines when not in use, in compliance with the California Air Resources Board regulations.
- 4.3 Facility operators shall train their managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- 4.4 Facility operators shall coordinate with CARB and SCAQMD to obtain the latest information about regional air quality concentrations, health risks, and trucking regulations.
- 4.7 Facility operators for sites that exceed 250 employees shall establish a rideshare program, in accordance with AQMD rule 2202, with the intent of discouraging single-occupancy vehicle trips and promote alternate modes of transportation, such as carpooling and transit where feasible.
- 4.8 A minimum of 5 percent of employee parking spaces shall be designated for electric or other alternative fueled vehicles.
- 5.5 Each Facility shall designate a Compliance Officer responsible for implementing the measures described herein and/or in the project conditions of approval and mitigation measures. Contact information should be provided to the County and updated annually, and signs should be posted in visible locations providing the contact information for the Compliance Officer to the surrounding community.

4.8.3 BASIS FOR DETERMINING SIGNIFICANCE

While estimated Project-related GHG emissions can be quantified, the direct impacts of such emissions on GCC and global warming cannot be determined on the basis of available science. There is no evidence at this time that would indicate that the emissions from a project the size of the proposed Project would directly or indirectly affect the global climate.

AB 32 states, in part, that “[g]lobal warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California.” Because global warming is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, the proposed Project would have no potential to result in a direct impact to global warming; rather, Project-related contributions to GCC, if any, only have potential significance on a cumulative basis. Therefore, the analysis below focuses on the Project’s potential to contribute to GCC in a cumulatively-considerable way.

Section VIII of Appendix G to the State CEQA Guidelines addresses typical adverse effects due to greenhouse gas emissions, and includes the following threshold questions. (OPR, 2018a) The proposed Project would result in a significant impact due to greenhouse gas emissions if the Project or any Project-related component would:



- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The above-listed thresholds are derived directly from Section VII of Appendix G to the State CEQA Guidelines and the County’s Environmental Assessment form, and address typical adverse effects associated with greenhouse gas emissions.

The above-listed thresholds for GHG’s do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the State CEQA Guidelines emphasize the lead agency’s discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA. With respect to GHG emissions, State CEQA Guidelines Section 15064.4(a) states that lead agencies “shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate” GHG emissions resulting from a project. The State CEQA Guidelines note that an agency has the discretion to either quantify a project’s GHG emissions or rely on a “qualitative analysis or other performance-based standards.” A lead agency may use a “model or methodology” to estimate GHG emissions and has the discretion to select the model or methodology it considers “most appropriate to enable decision makers to intelligently take into account the project’s incremental contribution to climate change.” Section 15064.4(b) provides that the lead agency should consider the following when determining the significance of impacts from GHG emissions on the environment: (ECORP, 2021a, p. 61)

1. The extent a project may increase or reduce GHG emissions as compared to the existing environmental setting.
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4(b)).

In addition, Section 15064.7(c) of the State CEQA Guidelines specifies that “[w]hen adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.” The State CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA’s requirements for cumulative impact analysis. As a note, the State CEQA Guidelines were amended in response to SB 97. In particular, the State CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant. (ECORP, 2021a, pp. 61-62)



Per State CEQA Guidelines Section 15064(h)(3), a project’s incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a “water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans, [and] plans or regulations for the reduction of greenhouse gas emissions.” Put another way, State CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions. (ECORP, 2021a, p. 62)

The significance of the Project’s GHG emissions is evaluated consistent with State CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. (ECORP, 2021a, p. 63)

The County of Riverside CAP aims to reduce GHG emissions from development projects under County jurisdiction. The CAP builds on state and regional policies aimed at reducing GHG emissions consistent with the SB 32 2030 GHG reduction target and statewide post-2030 reduction goals. To evaluate consistency with the CAP Update, the County has implemented CAP Update Screening Tables (Screening Tables) to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated in development projects. To this end, the Screening Tables establish categories of GHG Implementation Measures. Under each Implementation Measure category, mitigation or project design features (collectively “features”) are assigned point values that correspond to the minimum GHG emissions reduction that would result from each feature. Projects that yield at least 100 points are considered to be consistent with the GHG emissions reduction quantities anticipated in the County’s GHG Technical Report and support the GHG emissions reduction targets established under the CAP Update. The potential for such projects to generate direct or indirect GHG emissions that would result in a significant impact on the environment, or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG emissions, would be considered less than significant. (ECORP, 2021a, p. 63)

The CAP Update identifies a two-step approach in evaluating GHG emissions. First, a screening threshold of 3,000 MTCO₂e/yr is used to determine if additional analysis is required. Projects that exceed the 3,000 MTCO₂e/yr will be required to quantify and disclose the anticipated GHG emissions then either: 1) demonstrate how the project would reduce GHG emissions to levels below 3,000 MTCO₂e/yr through project design features and/or mitigation measures; or 2) garner 100 points through the Screening Tables. Projects that garner at least 100 points (equivalent to an approximate 49 percent reduction in GHG emissions) are determined to be consistent with the reduction quantities anticipated in the County’s GHG Technical Report, and consequently would be consistent with the CAP Update. As such, projects that achieve a total of 100 points



or more are considered to have a less-than-significant individual and cumulative impact on GHG emissions. (ECORP, 2021a, p. 63)

Consistent with State CEQA Guidelines § 15064.4(b)(2) and SCAQMD Tier 2 thresholds, the proposed Project is analyzed for consistency with the CAP Update in order to determine its significance.

4.8.4 IMPACT ANALYSIS

A. Methodology

GHG-related impacts were assessed in accordance with methodologies recommended by the County of Riverside. Onsite construction-related (including worker commutes and vendors), area source, energy source and water/wastewater pumping were modeled using CalEEMod, version 2016.3.2. CalEEMod is a statewide land use emissions computer model designed to quantify potential GHG emissions associated with both construction and operations from a variety of land use projects. (ECORP, 2021a, pp. 63-64)

Construction-generated GHG emissions for the proposed Project, including offsite improvements, were primarily calculated using CalEEMod model defaults for Riverside County. All on-road haul trucks were modeled as CARB-approved 2010 engines or newer, consistent with the requirements of the County of Riverside Board of Supervisors Good Neighbor Policy for Logistics and Warehouse/Distribution Uses (also refer to Mitigation Measure MM 4.3-7 in EIR Subsection 4.3). (ECORP, 2021a, p. 64)

GHG emissions during operations were based on the Project site plans and the estimated traffic trip generation rates and Project fleet mix from the Project’s Traffic Analysis (“TA”; EIR *Technical Appendix L2*). Additionally, operational mobile GHG emissions for the proposed Project are calculated with the 2017 version of the Emission FACtor model (EMFAC) developed by CARB. EMFAC 2017 is a mathematical model that was developed to calculate emission rates from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by CARB to estimate changes in future emissions from on-road mobile sources. The most recent United States Environmental Protection Agency (USEPA) approved version of this model, EMFAC 2017, incorporates regional motor vehicle data, information and estimates regarding the distribution of vehicle miles traveled by speed, and number of starts per day. The most important improvement in EMFAC 2017 is the integration of the new data and methods to estimate emissions from diesel trucks and buses. The model includes the emissions benefits of the truck and bus rule and the previously adopted rules for other on-road diesel equipment. The EMFAC 2021 model is available although has not yet been approved by the USEPA. (ECORP, 2021a, p. 64)

B. Project Impacts due to Greenhouse Gas Emissions

Threshold a.: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

As discussed below, the Project’s GHG emissions were estimated for both construction and long-term operation.



1. **Construction-Related GHG Emissions**

Construction-related activities that would generate GHG emissions include worker commute trips, haul trucks carrying supplies and materials to and from the Project site, and off-road construction equipment (e.g., dozers, loaders, excavators). Construction-generated GHG emissions associated with the proposed Project were calculated using the CARB-approved CalEEMod computer program, which is designed to model GHG emissions for land use development projects, based on typical construction requirements. The duration of construction has been adjusted to reflect a start date in the summer of 2021 and an anticipated opening year in the year 2025. The CalEEMod model defaults for the number of construction equipment employed was doubled for all construction phases with accelerated timelines. Construction-generated emissions were calculated to account for the construction of the entire Project simultaneously in order to identify the worst-case construction emissions potential. However, the actual construction of the Project site would be dependent on several factors, including timing of Project approvals, market conditions, and/or Project funding. As such, this analysis accounts for minor modifications as Project plans evolve from conceptual planning to final mapping. If construction starts at a later date, it can be expected that Project emissions would be reduced because CalEEMod incorporates lower emission factors associated with construction equipment in future years due to improved emissions controls and fleet modernization through turnover. See Attachment C to the Project's AQA (*Technical Appendix B*) for more information regarding the construction assumptions, including construction equipment and duration, used in this analysis. (ECORP, 2021a, pp. 64-65)

Table 4.8-3, *Construction-Related Greenhouse Gas Emissions*, illustrates the specific construction generated GHG emissions that would result from onsite and offsite construction of the Project. As shown in Table 4.8-3, Project construction would result in the generation of approximately 15,387 metric tons of CO₂e over the course of construction. Once construction is complete, the generation of these GHG emissions would cease. Consistent with SCAQMD guidance, total construction GHG emissions have been amortized over the estimated life of the Project, which is estimated at 30 years. The amortized construction emissions are added to the annual average operational emissions for the proposed Project. (ECORP, 2021a, p. 65)

2. **Operational-Related GHG Emissions**

Operation of the Project would result in GHG emissions predominantly associated with motor vehicle use. As previously described, the County of Riverside Board of Supervisors Good Neighbor Policy for Logistics and Warehouse/Distribution Uses contains several policy provisions that address GHG generated during construction of warehouse/distribution projects proposing building space larger than 250,000 square feet in size. These provisions would apply to the operations of the Project per Mitigation Measure MM 4.3-7 (refer to EIR Subsection 4.3). EIR Mitigation Measure MM 4.3-2 requires that all future cold storage warehousing be equipped with electrical hookups to eliminate idling of main and auxiliary engines during the loading and unloading process and provide for transport refrigeration units, auxiliary power units and other trucks requiring electrical power. This requirement eliminates the need for transport refrigeration units to supply the energy for refrigeration from diesel fuel, and thus substantially reduces emissions. EIR Mitigation Measure MM 4.3-3 also requires an electrical room(s) and/or exterior area(s) of the site to be designated where future electrical



Table 4.8-3 Construction-Related Greenhouse Gas Emissions

Emissions Source	CO ₂ e (Metric Tons/ Year)
Construction in 2021 (including offsite improvements)	389
Construction in 2022	2,038
Construction in 2023	4,502
Construction in 2024	4,469
Construction in 2025	3,989
Total	15,387

Source: CalEEMod version 2016.3.2; EMFAC2017. Refer to Attachment C to the Project’s AQA (*Technical Appendix B*) for Model Data Outputs.

Notes: All on-road haul trucks were modeled as CARB-approved 2010 engines or newer, consistent with County requirements and EIR Mitigation Measure 4.3-7. (ECORP, 2021a, Table 3-2)

panels would be located for the purpose of supplying power to on-site charging facilities for electric powered trucks at shell building permit. Conduit must be installed from this designated area where the panel would be located to the on-site location where the charging facilities would be located and where electric-powered trucks would park and connect to charging facilities to charge the batteries that power the motors of the electric-powered trucks. If the tenant is served by electric trucks, the electrical panel and charging units must be installed, and the electrical wiring connections must be made from the electrical panel to the charging units at issuance of a building permit for Tenant Improvements. EIR Mitigation Measure MM 4.3-4 also requires that at least five percent of all passenger vehicle parking spaces include EV charging stations. EIR Mitigation Measure 4.3-7 requires facility operators to maintain records of their fleet equipment and ensure that all diesel-fueled Medium-Heavy Duty Trucks and Heavy-Heavy Duty Trucks accessing the site use year CARB 2010 or newer engines. Thus, older model year trucks, which are less efficient and produce greater GHG emissions, would be prohibited from visiting the site. (ECORP, 2021a, pp. 65-66)

As previously described, operational GHG emissions were based on the Project site plans and the estimated traffic trip generation rates and Project fleet mix identified by the Project’s TA (*Technical Appendix L2*). Consistent with SCAQMD recommendations, in order to more accurately account for the trip distribution patterns of freight trucks, the average trip length is calculated at 63.7 miles, which represents the average distance between the Project site and the Port of Los Angeles/Long Beach, the Project site and the Banning Pass, the Project Site and the San Diego County line, the Project site and the Cajon Pass, and the Project site and downtown Los Angeles. Long-term operational GHG emissions attributable to the proposed Project (inclusive of amortized construction-related emissions) are identified in Table 4.8-4, *Total Project-Related GHG Emissions*. As shown in Table 4.8-4, the Project would generate 45,902 metric tons of CO₂e emissions annually. (ECORP, 2021a, p. 66)



Table 4.8-4 Total Project-Related GHG Emissions

Emissions Source	CO₂e (Metric Tons/ Year)
Construction Emissions (amortized over the 30-year life of the Project)	512
Area Source Emissions	0
Energy Source Emissions	9,522
Mobile Source Emissions	
<i>Passenger Vehicles</i>	146
<i>Heavy-Duty Trucks</i>	34,138
Mobile Source Total	34,284
Solid Waste Emissions	1,365
Water Emissions	219
Total Emissions	45,902

Source: CalEEMod version 2016.3.2; EMFAC2017. Refer to Attachment C to the Project’s AQA (*Technical Appendix B*) for Model Data Outputs.

Notes: Emissions projections account for a trip generation rate and fleet mix identified by the Project’s TA (*Technical Appendix L2*). Specifically, the Project’s TA estimates the generation of 5,422 average vehicle trips daily, 1,044 of which would be heavy-duty trucks. The average trip length is calculated at 63.7 miles, which represents the average distance between the Project site and the Port of Los Angeles/Long Beach, the Project site and the Banning Pass, the Project Site and the San Diego County line, the Project site and the Cajon Pass, and the Project site and downtown Los Angeles. (ECORP, 2021a, Table 3-3)

As previously described, the purpose of the County of Riverside CAP Update is to provide guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects within the County, including the proposed Specific Plan. To address the state’s requirement to reduce GHG emissions, the County prepared its CAP Update with the goal of reducing GHG emissions within the County by 49 percent below “existing” 2008 levels by the year 2030. The County’s target is consistent with the State Scoping Plan target and ensures that the County will be providing GHG reductions locally that will complement state efforts to reduce GHG emissions. The County’s target is also consistent with the SB 32 target that expands on AB 32 to reduce GHG emissions to 40 percent below the 1990 levels by 2030. Because the County’s CAP Update addresses GHG emissions reductions and is consistent with the requirements of the state Scoping Plan, SB 32, and international efforts to reduce GHG emissions, compliance with the CAP Update fulfills the description of mitigation found in the State CEQA Guidelines. (ECORP, 2021a, p. 67)

The CAP Update identifies a two-step approach in evaluating GHG emissions. First, a screening threshold of 3,000 metric tons of CO₂e per year is used to determine if additional analysis is required. Projects that exceed the 3,000 metric tons of CO₂e per year are required to quantify and disclose the anticipated GHG then either 1) demonstrate how the project would reduce GHG emissions to levels below 3,000 metric tons annually through project design features and/or mitigation measures; or 2) garner 100 points through the CAP Screening Tables. As shown on Table 4.8-4, the Project would result in substantially more GHG emissions than the



County's screening threshold of 3,000 metric tons of CO₂e per year. As such, prior to mitigation, the Project's impacts due to GHG emissions would be significant on a cumulatively-considerable basis, and mitigation requiring future developments to achieve 100 points per the CAP Screening Tables is required. (ECORP, 2021a, p. 67)

Threshold b.: Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

As previously stated, pursuant to § 15604.4 of the State CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. As such, the Project's consistency with AB 32, SB 32, and the County's CAP are discussed below.

☐ Project Consistency with AB 32/CARB 2008 Scoping Plan

The California Air Resources Board (CARB) Scoping Plan identifies strategies to reduce California's GHG emissions in support of AB 32 which requires the State to reduce its GHG emissions to 1990 levels by 2020. Many of the strategies identified in the Scoping Plan are not applicable at the project level, such as long-term technological improvements to reduce emissions from vehicles. Some measures are applicable and supported by the Project, such as energy efficiency. Finally, while some measures are not directly applicable, the Project would not conflict with their implementation. Reduction measures are grouped into 18 action categories, as follows:

1. California Cap-and-Trade Program Linked to Western Climate Initiative Partner Jurisdictions. Implement a broad-based California cap-and-trade program to provide a firm limit on emissions. Link the California cap-and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic benefits for California. Ensure California's program meets all applicable AB 32 requirements for market-based mechanisms.
2. California Light-Duty Vehicle GHG Standards. Implement adopted Pavley standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.
3. Energy Efficiency. Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities).
4. Renewables Portfolio Standards. Achieve 33% renewable energy mix statewide.
5. Low Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.
6. Regional Transportation-Related GHG Targets. Develop regional GHG emissions reduction targets for passenger vehicles.
7. Vehicle Efficiency Measures. Implement light-duty vehicle efficiency measures.



8. Goods Movement. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.
9. Million Solar Roofs Program. Install 3,000 megawatts of solar-electric capacity under California’s existing solar programs.
10. Medium- and Heavy-Duty Vehicles. Adopt medium- (MD) and heavy-duty (HD) vehicle efficiencies. Aerodynamic efficiency measures for HD trucks pulling trailers 53-feet or longer that include improvements in trailer aerodynamics and use of rolling resistance tires were adopted in 2008 and went into effect in 2010. Future, yet to be determined improvements, includes hybridization of MD and HD trucks.
11. Industrial Emissions. Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce GHG emissions and provide other pollution reduction co-benefits. Reduce GHG emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive methane emissions and reduce flaring at refineries.
12. High Speed Rail. Support implementation of a high-speed rail system.
13. Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California’s new and existing inventory of buildings.
14. High Global Warming Potential Gases. Adopt measures to reduce high warming global potential gases.
15. Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials, and mandate commercial recycling. Move toward zero-waste.
16. Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation. The 2020 target for carbon sequestration is 5 million MTCO₂e/yr.
17. Water. Continue efficiency programs and use cleaner energy sources to move and treat water.
18. Agriculture. In the near-term, encourage investment in manure digesters and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.

Table 4.8-5, *Project Consistency with 2008 CARB Scoping Plan*, summarizes the project’s consistency with the 2008 Scoping Plan. As summarized, the Project would not conflict with any of the provisions of the Scoping Plan and in fact supports seven of the action categories through energy efficiency, water conservation, recycling, and landscaping.

Table 4.8-5 Project Consistency with 2008 CARB Scoping Plan

Action	Supporting Measures	Consistency
Cap-and-Trade Program	--	Not applicable. These programs involve capping emissions from electricity generation, industrial facilities, and broad scoped fuels. Caps do not directly affect commercial projects.



Table 4.8-5 Project Consistency with 2008 CARB Scoping Plan

Action	Supporting Measures	Consistency
Light-Duty Vehicle Standards	T-1	Not applicable. While these are CARB-enforced measures that are not directly applicable to the proposed Project, vehicles that access the Project are required to comply with the standards and will comply with this strategy. EV charging stations are required to be installed on site per the 2019 Title 24 standards.
Energy Efficiency	E-1	Consistent. The Project would include a variety of building, water, and solid waste efficiencies consistent with the most current CALGreen requirements.
	E-2	
	CR-1	
	CR-2	
Renewables Portfolio Standard	E-3	Consistent. This measure is not directly applicable to development projects, but the proposed Project would use energy from Southern California Edison, which has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources.
Low Carbon Fuel Standard	T-2	Consistent. Establishes reduced carbon intensity of transportation fuels. All fuel used by Project construction equipment and future Project occupants would obtain fuel subject to the LCFS.
Regional Transportation-Related GHG Targets	T-3	Not applicable. This is a Statewide measure and is not within the purview of this Project.
Vehicle Efficiency Measures	T-4	Not applicable. Identifies measures such as minimum tire-fuel efficiency, lower friction oil, and reduction in air conditioning use.
Goods Movement	T-5	Not applicable. Identifies measures to improve goods movement efficiencies such as advanced combustion strategies, friction reduction, waste heat recovery, and electrification of accessories. While these measures are not directly applicable to the Project, any commercial activity associated with Goods Movement would be required to comply with these measures as adopted. As such, the proposed Project would not interfere with their implementation.
	T-6	
Million Solar Roofs (MSR) Program	E-4	Consistent. The MSR program sets a goal for use of solar systems throughout the state as a whole. Consistent with CAP measure R2-CE1, as would be required pursuant to the mitigation measures identified herein, proposed buildings larger than 100,000 s.f. in size would be required to generate on-site renewable energy of at least 20% of energy demand for commercial, office, industrial, or manufacturing development.
Medium- and Heavy-Duty Vehicles	T-7	Not applicable. MD and HD trucks and trailers for industrial uses would be subject to aerodynamic and hybridization requirements as established by CARB; the proposed Project would not interfere with implementation of these requirements and programs.
	T-8	
Industrial Emissions	I-1	Not applicable. These measures are applicable to large industrial facilities (> 500,000 MTCO ₂ e/yr) and other intensive uses such as refineries. As shown in Table 4.8-4, the Project is not anticipated to generate more than 500,000 MTCO ₂ e/yr.
	I-2	
	I-3	
	I-4	
	I-5	



Table 4.8-5 Project Consistency with 2008 CARB Scoping Plan

Action	Supporting Measures	Consistency
High-Speed Rail	T-9	Not applicable. Supports increased mobility choice.
Green Building Strategy	GB-1	Consistent. The Project would include a variety of building, water, and solid waste efficiencies consistent with the current CALGreen requirements.
High Global Warming Potential Gases	H-1	Not Applicable. The proposed Project is not a substantial source of high GWP emissions and would comply with any future changes in air conditioning, fire protection suppressant, and other requirements.
	H-2	
	H-3	
	H-4	
	H-5	
	H-6	
	H-7	
Recycling and Waste	RW-1	Consistent. The Project would be required recycle a minimum of 65% from construction activities and Project operations per State and County requirements.
	RW-2	
	RW-3	
Sustainable Forests	F-1	Consistent. The Project would increase carbon sequestration by increasing on-site trees per the project landscape design guidelines.
Water	W-1	Consistent. The Project would include use of low-flow fixtures and efficient landscaping per State and County requirements.
	W-2	
	W-3	
	W-4	
	W-5	
	W-6	
Agriculture	A-1	Not applicable. The Project does not propose agricultural uses.

□ Project Consistency with SB 32/2017 Scoping Plan

The 2017 Scoping Plan Update reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Table 4.8-6, *Project Consistency with 2017 CARB Scoping Plan*, summarizes the Project’s consistency with the 2017 Scoping Plan. As summarized in Table 4.8-6, the Project would not conflict with any of the provisions of the Scoping Plan and in fact supports seven of the action categories. Additionally, any regulations adopted would apply directly or indirectly to the Project. Further, recent studies show that the State’s existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40% below 1990 levels by 2030.

Table 4.8-6 Project Consistency with 2017 CARB Scoping Plan

Action	Responsible Parties	Consistency
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.	CPUC, CEC, CARB	Consistent. This measure is not directly applicable to development projects, but the proposed Project would use energy from Southern California Edison, which has committed to diversify its portfolio of energy sources



Table 4.8-6 Project Consistency with 2017 CARB Scoping Plan

Action	Responsible Parties	Consistency
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		by increasing energy from wind and solar sources.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly-owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		Consistent. Although this measure is directed towards policymakers, the proposed Project would be designed consistent with CAP measure R2-CE1, which would generate on-site renewable energy of at least 20% of energy demand for commercial, office, industrial or manufacturing development for any proposed buildings that exceed 100,000 s.f. in size.
		Consistent. Although this measure is directed towards policymakers, the proposed Project would be designed consistent with CAP measure R2-CE1, which would generate on-site renewable energy of at least 20% of energy demand for commercial, office, industrial or manufacturing development for any proposed buildings that exceed 100,000 s.f. in size.
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, OPR, Local Agencies	Consistent. These are CARB enforced standards; vehicles that access the Project would be required to comply with the standards.
At least 4.2 million zero emission and plugin hybrid light-duty electric vehicles by 2030.		Consistent. These are CARB enforced standards; vehicles that access the Project would be required to comply with the standards.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.		Consistent. These are CARB enforced standards; vehicles that access the Project would be required to comply with the standards.
Medium- and Heavy-Duty GHG Phase 2.		Consistent. These are CARB enforced standards; vehicles that access the Project would be required to comply with the standards.
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO _x standard.		Not applicable. This measure is not within the purview of this Project.
Last Mile Delivery: New regulation that would result in the use of low NO _x or		Not applicable. This Project is not responsible for implementation of SB 375 and would therefore not



Table 4.8-6 Project Consistency with 2017 CARB Scoping Plan

Action	Responsible Parties	Consistency
cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3-7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		conflict with this measure.
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document “Potential VMT Reduction Strategies for Discussion.”		Not applicable. This Project is not responsible for implementation of SB 375 and would therefore not conflict with this measure.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	Not applicable. The Project is not within the purview of SB 375 and would therefore not conflict with this measure.
By 2019, adjust performance measures used to select and design transportation facilities		
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor’s Office of Business and Economic Development (GOBiz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	Not applicable. Although this is directed towards CARB and Caltrans, the proposed Project would be designed to promote and support pedestrian activity on-site and in the Project area.
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy	CalSTA, Caltrans, CTC,	Not applicable. Although this measure is directed towards policymakers, the proposed Project would comply with AB 341, which sets a statewide policy



Table 4.8-6 Project Consistency with 2017 CARB Scoping Plan

Action	Responsible Parties	Consistency
duty, road user, parking pricing, transit discounts).	OPR, SGC, CARB	that not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020. Additionally, the proposed Project would be required to have a recycling program and recycling collection. During construction, the proposed Project Applicant would be required to recycle and reuse construction and demolition waste per County solid waste requirements and regulations.
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, CalEPA, CNRA, CARB, Caltrans, CEC, GO-Biz	When adopted, this measure would apply to all trucks accessing the Project site, this may include existing trucks or new trucks that are part of the statewide goods movement sector.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.		Not applicable. This measure is not within the purview of this Project.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	When adopted, this measure would apply to all fuel purchased and used by the Project in the State.
Implement the Short-Lived Climate Pollutant Strategy by 2030		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, SWRCB, Local Air Districts	When adopted, the Project would be required to comply with this measure and reduce SLPS accordingly.
50% reduction in black carbon emissions below 2013 levels.		Not applicable. This measure is not within the purview of this Project.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA SWRCB, Local Air Districts	Not applicable. This measure is not within the purview of this Project.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	When adopted, the Project would be required to comply with the Cap-and-Trade Program if it generates emissions from sectors covered by Cap-and-Trade.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	Not applicable. This measure is not within the purview of this Project.
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity		Not applicable. This measure is not within the purview of this Project.



Table 4.8-6 Project Consistency with 2017 CARB Scoping Plan

Action	Responsible Parties	Consistency
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments		Not applicable. This measure is not within the purview of this Project.
Establish scenario projections to serve as the foundation for the Implementation Plan		Not applicable. This measure is not within the purview of this Project.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	Not applicable. This measure is not within the purview of this Project.
Implement Forest Carbon Plan	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA	Not applicable. This measure is not within the purview of this Project.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	Not applicable. This measure is not within the purview of this Project.

Project Consistency with Riverside County CAP Update

The County of Riverside approved the CAP Updated on December 17, 2019. The CAP Update was designed under the premise that the County, and the community it represents, is uniquely capable of addressing emissions associated with sources under Riverside County’s jurisdiction, and that Riverside County’s emission reduction efforts should coordinate with the state strategies of reducing emissions in order to accomplish these reductions in an efficient and cost-effective manner.

In order to evaluate consistency with the CAP, the County provided Screening Tables to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated into development projects. The County’s CAP currently evaluates and quantifies reductions out to Year 2030. The CAP states that “[t]hrough 2050, Riverside County would continue implementation of the Screening Tables. During this time, the reduction measures implemented through the Screening Tables would continue to reduce GHG missions from new development. Additionally, it is assumed that the State measures would keep being updated and reinforced to further reduce emissions. With these assumptions, Riverside County’s emissions would decrease to a level below the reduction target by 2050.” Thus, compliance with the CAP would serve to meet and support the reduction targets established Senate Bill 32 and the CARB 2017 Scoping Plan.

Pursuant to the CAP Update and associated Screening Tables, projects that garner at least 100 points (equivalent to an approximate 49% reduction in GHG emissions below 2008 baseline levels) are determined to be consistent with the reduction quantities anticipated in the County’s GHG Technical Report, and



consequently would be consistent with the CAP. Absent implementation of Screening Table Measures, the Project could be considered inconsistent with the County CAP. This is a potentially significant impact for which mitigation is required.

The CAP Update also includes measure R2-CE1, which requires on-site renewable energy production. This measure is required for any tentative tract map, plot plan, or conditional use permit that proposes to add more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development. Renewable energy production shall be onsite generation of at least 20% of energy demand for commercial, office, industrial or manufacturing development. Future implementing developments within the Project site would be subject to compliance with measure R2-CE1 as a standard condition of approval, and thus the Project would not conflict with CAP Update measure R2-CE1.

4.8.5 CUMULATIVE IMPACT ANALYSIS

As discussed in subsection 4.8.1, there is no evidence at this time that would indicate that the emissions from a project the size of the Project would directly or indirectly affect the global climate. As such, Project impacts due to GHG emissions are inherently cumulative in nature.

As discussed under the analysis of Threshold a., the Project would result in approximately 45,902 MTCO_{2e}/yr; thus, the proposed Project would exceed the County's screening threshold of 3,000 MTCO_{2e}/yr. Accordingly, the Project would have the potential to result in a cumulatively-considerable impact on the environment with respect to GHG emissions.

As discussed under the analysis of Threshold b., the Project would be consistent with or otherwise would not conflict with the CARB 2008 Scoping Plan and the CARB 2017 Scoping Plan. However, the Project has the potential to conflict with the Riverside County CAP Update if the Project were unable to achieve 100 points pursuant to the CAP Screening Tables. This is evaluated as a cumulatively-considerable impact of the proposed Project.

4.8.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Significant Cumulatively-Considerable Impact. The Project would result in approximately 45,902 MTCO_{2e}/yr; thus, the proposed Project would exceed the County's screening threshold of 3,000 MTCO_{2e}/year. If the Project were to fail to achieve 100 points pursuant to the CAP Screening Tables, Project-related GHG emissions would have the potential to result in a significant cumulatively-considerable impact on the environment.

Threshold b.: Significant Cumulatively-Considerable Impact. The Project would be consistent with or otherwise would not conflict with the CARB 2008 Scoping Plan and the CARB 2017 Scoping Plan. However, the Project has the potential to conflict with the Riverside County CAP Update if the Project were unable to achieve 100 points pursuant to the CAP Screening Tables. This is evaluated as a cumulatively-considerable impact of the proposed Project.



4.8.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

The Project would be required to comply with all mandates imposed by the State of California and SCAQMD aimed at the reduction of GHG emissions. Those that are applicable to the Project and that would assist in the reduction of greenhouse gas emissions are listed below:

- Global Warming Solutions Act of 2006 (AB32).
- Pavley Fuel Efficiency Standards (AB1493). Establishes fuel efficiency ratings for new vehicles.
- Title 17 California Code of Regulations (Low Carbon Fuel Standard). Requires carbon content of fuel sold in California to be 10% less by 2020.
- Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions.
- Renewable Portfolio Standards (SB 100). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to achieve a target of 50% renewable resources by December 31, 2026, and to achieve a 60% target by December 31, 2030.. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours (kWh) of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030.
- Senate Bill 32 (SB 32). Requires the state to reduce statewide greenhouse gas emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15.

Mitigation

- MM 4.8-1 Prior to approval of implementing development permit applications (i.e., plot plans, conditional use permits, etc.) and prior to building permit issuance, the Project Applicant shall demonstrate that appropriate building construction measures shall apply to achieve a minimum of 100 points per Appendix D to the Riverside County 2019 Climate Action Plan (CAP) Update. The conceptual measures anticipated for the Project are listed in Table 3-4 of the Project's Air Quality Assessment (AQA), which is appended to this EIR as *Technical Appendix B*. The conceptual measures may be replaced with other measures as listed in the CAP Screening Tables (Appendix D to the CAP Update), as long as they are replaced at the same time with other measures that in total achieve a minimum of 100 points per Appendix D to the Riverside County CAP Update.
- MM 4.8-2 Pursuant to Riverside County Climate Action Plan Update Measure R2-CE1, prior to issuance of building permits, and in accordance with measure R2-CE1 of the County's Climate Action



Plan (CAP) Update, future implementing building permits that involve more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development shall be required to offset the energy demand through renewable energy production. Renewable energy production shall be onsite generation of at least 20% of energy demand for commercial, office, industrial or manufacturing development.

4.8.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold a.: Significant and Unavoidable Cumulatively-Considerable Impact. The Riverside County CAP Update (November 2019) qualifies as a “Plan for the Reduction of Greenhouse Gas Emissions,” pursuant to State CEQA Guidelines § 15183.5(b). Pursuant to State CEQA Guidelines §§ 15064(h)(3) and 15130(d), a lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program. Additionally, and as discussed above in subsection 4.8.2, Tier 2 of the SCAQMD interim thresholds for GHG emissions indicates that if a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions. Implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2 would ensure that the proposed Project is fully consistent with the Riverside County CAP Update by requiring the Project Applicant to demonstrate that implementing building permit applications have incorporated measures to achieve a minimum of 100 points pursuant to the CAP Update Screening Tables, and by requiring the Project to offset energy demands through renewable energy production. Notwithstanding, even with implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2, it cannot be ensured that the Project’s GHG emissions would be reduced to below the CAP Update screening level threshold of 3,000 MTCO_{2e}.

The Project cannot feasibly achieve no net increase in GHG emissions, nor can the applicable CAP Update screening-level threshold (3,000 MTCO_{2e}/yr) be achieved. In this regard, the majority (approximately 75 percent) of the Project’s GHG emissions would be generated by Project vehicular sources. Responsibility and authority for regulation of vehicular-source emissions resides with the State of California (CARB, etc.) and the federal government. Neither the Project Applicant nor the Lead Agency (Riverside County) can affect or mandate substantial reductions in vehicular-source GHG emissions, much less reductions that would achieve a no net increase condition or achieve the CAP Update screening-level threshold of 3,000 MTCO_{2e}/yr. In effect, all Project traffic would need to be eliminated or be “zero GHG emissions sources” in order to achieve the CAP Update threshold. There are no feasible measures or alternatives to eliminate all Project traffic, or to ensure that Project traffic would consist of zero GHG emissions sources. In terms of its practical application, this would constitute a “no build” condition and is evaluated as the “No Development Alternative” in EIR Section 6.0.

Although the Project would be fully consistent with the Riverside County 2019 CAP Update with implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2, because the Project’s emissions cannot be reduced to below the CAP Update screening threshold of 3,000 MTCO_{2e}/yr, Project impacts due to direct or indirect GHG emissions are conservatively evaluated as a significant and unavoidable impact of the proposed Project for which additional feasible mitigation measures are not available.



Threshold b.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2 would ensure that the proposed Project is fully consistent with the Riverside County CAP Update by requiring the Project Applicant to demonstrate that future implementing building permit applications have incorporated measures to achieve a minimum of 100 points pursuant to the CAP Update Screening Tables. With implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2, Project impacts due to a potential conflict with the CAP Update would be reduced to less-than-significant levels.



4.9 HAZARDS AND HAZARDOUS MATERIALS

The information and analysis presented in this Subsection is based in part on a technical study that was prepared to determine the presence or absence of hazardous materials on the Project site under existing conditions. This report, entitled, “Phase I Environmental Site Assessment, Renaissance Ranch located north of Bucking Bay/Palomino Creek Corona, California 92883” (herein, “Phase I ESA”), was prepared by Hillmann Consulting (herein, “Hillmann”), is dated August 21, 2019, and is included as EIR *Technical Appendix G1* (herein, “Phase II ESA”) (Hillmann, 2019). The analysis in this Subsection also is based in part on a report prepared by Hillmann, entitled, “Limited Phase II Subsurface Investigation Report,” dated July 30, 2021, and included as *Technical Appendix G2* to this EIR (Hillmann, 2021).

4.9.1 EXISTING CONDITIONS

A. Definition of Toxic Substances and Hazardous Waste

For purposes of this EIR, the term “toxic substance” is defined as a substance which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may present an unreasonable risk of injury to human health or the environment. Toxic substances include: chemical, biological, flammable, explosive, and radioactive substances.

“Hazardous material” is defined as a substance which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may: 1) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, disposed of, or otherwise mismanaged; or 2) cause or contribute to an increase in mortality or an increase in irreversible or incapacitating illness.

Hazardous waste is defined in the California Code of Regulations, Title 22, § 66261.3. The defining characteristics of hazardous waste are: ignitability (oxidizers, compressed gases, and extremely flammable liquids and solids), corrosivity (strong acids and bases), reactivity (explosives or generates toxic fumes when exposed to air or water), and toxicity (materials listed by the United States Environmental Protection Agency [USEPA] as capable of inducing systemic damage to humans or animals).

Certain wastes are called “Listed Wastes” and are found in the California Code of Regulations, Title 22, §§ 66261.30 through 66261.35. Wastes appear on the lists because of their known hazardous nature or because the processes that generate them are known to produce hazardous wastes (which are often complex mixtures).

B. Historical Review, Regulatory Review, and Field Reconnaissance

Hillman performed a search of readily available environmental record sources. The search results are summarized below. The search radius for each data base was one mile from the Project site. Environmental Data Resources, Inc. (EDR) conducted a search for sites listed on various federal and state databases within one mile of the Project site. A detailed description of the results of the regulatory and historical records review is provided in the Project’s Phase I ESA (*Technical Appendix G1*), and is summarized below.



1. Historical Review

Research has been conducted by Hillmann in an attempt to develop a history of the previous uses of the property and surrounding area, in order to help identify the likelihood of past uses having led to Recognized Environmental Conditions (RECs) in connection with the property. Standard historical sources have been sought in an attempt to document the past uses of the Property as far back as it can be shown that the Project site contained structures; or from the time the Project site was first used for residential, agricultural, commercial, industrial, or governmental purposes. Hillmann conducted a review of fire insurance maps, city directories, historical topographic maps, historical aerial photographs, historical records published by EDR, petroleum/natural gas well records, and other additional historical data. (Hillmann, 2019, pp. 15-18)

Based on the results of this review, it was determined that the Project site was vacant between 1938 to 1961, but was used for agricultural production between approximately 1967 and 1997. Based on the historic usage of the Project site for crop fields and orchards from as early as 1960s to 1997, historic applications of pesticides have likely occurred at the Project site, which may have resulted in the accumulation of pesticide and metals compounds in the shallow soils. (Hillmann, 2019, p. 19)

2. Regulatory Records Review

Hillmann obtained a regulatory database report, titled EDR Radius Map™ Report, from Environmental Data Resources of Shelton, CT. The report provided a search of standard environmental record sources for listings of the Project site, adjoining properties, and sites within the surrounding area, and has been reviewed for the purpose of identifying listings suggesting a potential impact to the Project site due to presence or migration of hazardous substances and/or petroleum products. Based on the results of the regulatory records review, Hillmann did not identify any RECs affecting the Project site. (Hillmann, 2019, pp. 19-24)

3. Site Reconnaissance

The site reconnaissance conducted by Hillmann consisted of visual and/or physical observations of the Project site and improvements, adjoining properties as viewed from the Project boundaries, and the surrounding area based on visual observations from adjoining public thoroughfares. Building exteriors were observed at ground level, unless otherwise indicated. Where applicable, representative areas of building interiors were accessed and observed to the extent they were made safely accessible with the cooperation of the site escort. The portions of the northwest and southeast of the Project site were inaccessible due to the presence of thick vegetation and steeply sloping terrain. (Hillmann, 2019, p. 25)

The following provides a summary of the site reconnaissance conducted by Hillmann with respect to specific hazardous substances and petroleum products (Hillmann, 2019, pp. 25-28):

- No visual observations indicative of a potential environmental concern were noted on the adjoining properties.
- No hazardous substances and petroleum products were observed to be stored and used by property occupants.



- No hazardous substance or petroleum product drums were noted on the Project site.
- No unidentified substance containers suspected of containing hazardous substance or petroleum product were noted on the Project site.
- No other containers of hazardous substances or petroleum products were noted on the Project site.
- No oil-filled electrical or hydraulic equipment was identified at the Project site.
- Three (3) utility owned pole mounted transformers were observed along the northern side of the Project site. No evidence of leakage from the transformers was noted. Given the utility ownership and lack of observed leakage, the transformers are not considered to be a significant environmental concern.
- No strong, pungent, or noxious odors were noted at the Project site.
- No standing water or pools of liquid likely to contain hazardous substances or petroleum products were noted at the Project site.
- No floor drains or sump pits were noted at the Project site other than for storm water or sewage management.
- No exterior pits, ponds or lagoons was identified on the Project site in connection with waste treatment or disposal.
- No stained soil, pavement or stressed vegetation was observed at the Project site.
- No evidence of any on-site solid waste dumping was noted at the Project site. No evidence of recently deposited fill materials was observed at the Project site.
- No sanitary sewer discharges were identified at the Project site.
- No septic systems were identified at the Project site.
- No potable, monitoring or other groundwater wells were identified at the Project site.
- No railroad spurs were identified on the Project site.

4. Phase II ESA Results

In order to address the potential for soils on site to be contaminated with organo-chlorine pesticides (OCP) or heavy metals, Hillmann conducted a Phase II investigation, the results of which are included as *Technical Appendix G2* to this EIR. Hillmann collected sixty-eight (68) shallow soil samples from various areas on the Property formerly utilized as orchards/agricultural land, which were composited into seventeen (17) samples representative of a sampling area/quadrant. A total of seventeen (17) composited soil samples were submitted for laboratory analysis for organo-chlorine pesticides (OCP) by EPA Method 8081A and Title 22 Metals by EPA Method 6010B. Results of OCP analysis indicated no detectable levels of OCPs in samples collected. Results of heavy metal analysis indicated the samples had low background levels of barium, chromium, cobalt, copper, lead, nickel, molybdenum, vanadium, and zinc. The detected compounds were compared to Regional Screening Levels (RSLs) developed by Environmental Protection Agency (EPA), which are based on human health toxicity factors for residential and commercial settings. The results from heavy metal analysis indicate



the samples had low, background levels of metals, which did not exceed the applicable RSLs for residential applications. (Hillmann, 2021, pp. 1-2)

C. Airport Hazards

The Project site is not located within two miles of a public airport or within an airport land use plan. The closest airport is the Corona Municipal Airport located roughly 14.5 miles northwest of the Project site. According to Map CO-1 of the Riverside County Airport Land Use Compatibility Plan Policy Document, the Project site is located outside of the compatibility zones for the Corona Municipal Airport, indicating that the Project site is not subject to airport-related hazards. (RCALUC, 2004) Additionally, the Project site is located approximately 8.8 miles northwest of Skylark Field, which is a private airport located within the City of Lake Elsinore. (Google Earth, 2018)

4.9.2 APPLICABLE ENVIRONMENTAL REGULATIONS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to hazards and hazardous materials.

A. Hazardous Materials Regulations and Plans

1. Federal Regulations

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Superfund Amendments and Reauthorization Act (SARA)

The Comprehensive Environmental Response, Compensation, and Liability Act, also known as CERCLA or Superfund, provides a Federal "Superfund" to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment. Through CERCLA, the Environmental Protection Agency (EPA) was given power to seek out those parties responsible for any release and assure their cooperation in the cleanup. EPA cleans up orphan sites when potentially responsible parties cannot be identified or located, or when they fail to act. Through various enforcement tools, EPA obtains private party cleanup through orders, consent decrees, and other small party settlements. EPA also recovers costs from financially viable individuals and companies once a response action has been completed. (EPA, n.d.)

EPA is authorized to implement the Act in all 50 states and U.S. territories. Superfund site identification, monitoring, and response activities in states are coordinated through the state environmental protection or waste management agencies. (EPA, n.d.)

The Superfund Amendments and Reauthorization Act (SARA) of 1986 reauthorized CERCLA to continue cleanup activities around the country. Several site-specific amendments, definitions clarifications, and technical requirements were added to the legislation, including additional enforcement authorities. Also, Title III of SARA authorized the Emergency Planning and Community Right-to-Know Act (EPCRA). (EPA, n.d.)



Resource Conservation and Recovery Act (RCRA)

The Resource Conservation and Recovery Act (RCRA) gives EPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances. (EPA, n.d.)

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization and phasing out land disposal of hazardous waste as well as corrective action for releases. Some of the other mandates of this law include increased enforcement authority for EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program. (EPA, n.d.)

Hazardous Materials Transportation Act (HMTA)

The Hazardous Materials Transportation Act of 1975 (HMTA) empowered the Secretary of Transportation to designate as hazardous material any "particular quantity or form" of a material that "may pose an unreasonable risk to health and safety or property." (OSHA, n.d.)

Hazardous materials regulations are subdivided by function into four basic areas:

- Procedures and/or Policies 49 CFR Parts 101, 106, and 107
- Material Designations 49 CFR Part 172
- Packaging Requirements 49 CFR Parts 173, 178, 179, and 180
- Operational Rules 49 CFR Parts 171, 173, 174, 175, 176, and 177 (OSHA, n.d.)

The HMTA is enforced by use of compliance orders [49 U.S.C. 1808(a)], civil penalties [49 U.S.C. 1809(b)], and injunctive relief (49 U.S.C. 1810). The HMTA (Section 112, 40 U.S.C. 1811) preempts state and local governmental requirements that are inconsistent with the statute, unless that requirement affords an equal or greater level of protection to the public than the HMTA requirement. (OSHA, n.d.)

Hazardous Materials Transportation Uniform Safety Act of 1990

In 1990, Congress enacted the Hazardous Materials Transportation Uniform Safety Act (HMTUSA) to clarify the maze of conflicting state, local, and federal regulations. Like the HMTA, the HMTUSA requires the Secretary of Transportation to promulgate regulations for the safe transport of hazardous material in intrastate, interstate, and foreign commerce. The Secretary also retains authority to designate materials as hazardous when they pose unreasonable risks to health, safety, or property. (OSHA, n.d.)

The statute includes provisions to encourage uniformity among different state and local highway routing regulations, to develop criteria for the issuance of federal permits to motor carriers of hazardous materials, and to regulate the transport of radioactive materials. (OSHA, n.d.)



Occupational Safety and Health Act (OSHA)

Congress passed the Occupational and Safety Health Act (OSHA) to ensure worker and workplace safety. Their goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. (EPA, n.d.)

In order to establish standards for workplace health and safety, the Act also created the National Institute for Occupational Safety and Health (NIOSH) as the research institution for OSHA. OSHA is a division of the U.S. Department of Labor that oversees the administration of the Act and enforces standards in all 50 states. (EPA, n.d.)

Toxic Substances Control Act

The Toxic Substances Control Act of 1976 provides EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics, and pesticides. TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint. (EPA, n.d.)

Various sections of TSCA provide authority to:

- Require, under Section 5, pre-manufacture notification for "new chemical substances" before manufacture
- Require, under Section 4, testing of chemicals by manufacturers, importers, and processors where risks or exposures of concern are found
- Issue Significant New Use Rules (SNURs), under Section 5, when it identifies a "significant new use" that could result in exposures to, or releases of, a substance of concern.
- Maintain the TSCA Inventory, under Section 8, which contains more than 83,000 chemicals. As new chemicals are commercially manufactured or imported, they are placed on the list.
- Require those importing or exporting chemicals, under Sections 12(b) and 13, to comply with certification reporting and/or other requirements.
- Require, under Section 8, reporting and record-keeping by persons who manufacture, import, process, and/or distribute chemical substances in commerce.
- Require, under Section 8(e), that any person who manufactures (including imports), processes, or distributes in commerce a chemical substance or mixture and who obtains information which reasonably supports the conclusion that such substance or mixture presents a substantial risk of injury to health or the environment to immediately inform EPA, except where EPA has been adequately informed of such information. EPA screens all TSCA b§8(e) submissions as well as voluntary "For Your Information" (FYI) submissions. The latter are not required by law, but are submitted by industry and public interest groups for a variety of reasons. (EPA, n.d.)



2. *State Regulations*

Cal/OSHA and the California State Plan

Under an agreement with OSHA, since 1973 California has operated an occupational safety and health program in accordance with Section 18 of the federal OSHA. The State of California's Department of Industrial Relations administers the California Occupational Safety and Health Program, commonly referred to as Cal/OSHA. The State of California's Division of Occupational Safety and Health (DOSH) is the principal agency that oversees plan enforcement and consultation. In addition, the California State program has an independent Standards Board responsible for promulgating State safety and health standards, and reviewing variances. It also has an Appeals Board to adjudicate contested citations and the Division of Labor Standards Enforcement to investigate complaints of discriminatory retaliation in the workplace. (OSHA, n.d.)

Pursuant to 29 CFR 1952.172, the California State Plan applies to all public and private sector places of employment in the state, with the exception of federal employees, the United States Postal Service, private sector employers on Native American lands, maritime activities on the navigable waterways of the United States, private contractors working on land designated as exclusively under federal jurisdiction and employers that require federal security clearances. Cal/OSHA is the only agency in the state authorized to adopt, amend, or repeal occupational safety and health standards or orders. In addition, the Standards Board maintains standards for certain things not covered by federal standards or enforcement, including: elevators, aerial passenger tramways, amusement rides, pressure vessels and mine safety training. The Cal/OSHA enforcement unit conducts inspections of California workplaces in response to a report of an industrial accident, a complaint about an occupational safety and health hazard, or as part of an inspection program targeting industries with high rates of occupational hazards, fatalities, injuries or illnesses. (OSHA, n.d.)

California Hazardous Waste Control Law

The Hazardous Waste Control Law (HWCL) (Health and Safety Code [HSC], Division 20, Chapter 6.5, Section 25100, et seq.) is the primary hazardous waste statute in California. The HWCL implements RCRA as a "cradle-to-grave" waste management system in the state. It specifies that generators have the primary duty to determine whether their wastes are hazardous and to ensure its proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous wastes used or reuse as raw materials. The HWCL exceeds federal requirements by mandating source reduction planning and broadening requirements for permitting facilities that treat hazardous waste. It also regulates a number of waste types and waste management activities not covered by federal law (RCRA). (CA Legislative Info, n.d.)

California Code of Regulations (CCR), Titles 22 and 26

A variety of California Code of Regulation (CCR) titles address regulations and requirements for generators of hazardous waste. Title 22 contains detailed compliance requirements for hazardous waste generators, transporters, and facilities for treatment, storage, and disposal. Because California is a fully-authorized state according to RCRA, most regulations (i.e., 40 CFR 260, et seq.) have been duplicated and integrated into Title 22. However, because the Department of Toxic Substances Control (DTSC) regulates hazardous waste more stringently than the EPA, the integration of state and federal hazardous waste regulations that make up Title



22 does not contain as many exemptions or exclusions as does 40 CFR 260. As with the HSC, Title 22 also regulates a wider range of waste types and waste management activities than does RCRA. To aid the regulated community, California has compiled hazardous materials, waste, and toxics-related regulations from CCR, Titles 3, 8, 13, 17, 19, 22, 23, 24 and 27 into one consolidated listing: CCR Title 26 (Toxics). However, the hazardous waste regulations are still commonly referred to collectively as “Title 22.” (DTSC, n.d.; DTSC, 2016)

3. *Local Regulations*

Riverside County Ordinance No. 651.5

Riverside County Ordinance No. 651.1 is intended to implement, within the County of Riverside, the Hazardous Materials Release Response Plans and Inventory Law, Chapter 6.95 of the California Health and Safety Code (HSC), to establish a system for permitting businesses that handle hazardous materials, to enforce minimum standards respecting such materials, and to designate the County of Riverside, Department of Environmental Health (DEH), as the administering agency (or Certified Unified Program Agency-CUPA) responsible for administering and enforcing Chapter 6.95 HSC. Ordinance No. 651.5 sets forth requirements for handling hazardous materials, requires a permit for handling certain types and quantities of hazardous materials, requires businesses to report their hazardous materials inventory, identifies different classifications of hazardous materials handlers, and requires reporting of spills or releases or threatened releases of a hazardous material to the DEH and to the Governor’s Office of Emergency Services. (Riverside County, 2019c)

B. Airport and Aircraft Hazards Regulations and Plans

1. *State Regulations*

State Aeronautics Act

The State Aeronautics Commission Act of 1947 created the Division of Aeronautics (“Division”), and was later amended by statute to read the State Aeronautics Act (Aeronautics Act) in 1961. As a result of this legislation, the Division’s first priorities are those mandated by the Aeronautics Act, then Caltrans guidance, then Division guidance as expressed through its Policy Element. As directed by the Aeronautics Act, the Division is a steward and advocate of aviation in California. To that end, its efforts are focused on activities that “protect the public interest in aeronautics and aeronautical progress.” (§ 21002) (CA Legislative Info, n.d.)

The Aeronautics Act itself is divided into six chapters, the first five of which have not received significant cleanup legislation since its enabling in 1947. The first chapter begins with general provisions and definitions and explains the Legislature’s intent for a State aviation program. Chapter two explains Caltrans’ role in administering the Division, and explains the role of the California Transportation Commission (CTC). Chapter three includes many of the safety considerations from Federal Aviation Administration (FAA) regulations that help keep airports and the surrounding communities safe and compatible with flight operations. Chapter four deals with airport and heliport permitting, air navigation facilities, noise guidelines, funding, and importantly, the formation and authority of Airport Land Use Commissions (ALUC). Chapter five covers the investigations



and hearings on matters covered in the Aeronautics Act. Finally, Chapter six introduces airport planning and specifically introduces the intent of the CASP and how it can be used to support California aviation. (CA Legislative Info, n.d.)

California Environmental Quality Act

The operation of airports and aircraft is the responsibility of the Federal Aviation Administration (FAA), but the requirement to document potential hazards related to airports and air activities when a new project is proposed is contained in CEQA, specifically PRC Section 21096, which states: (CA Legislative Info, n.d.)

“(a) If a lead agency prepares an environmental impact report for a project situated within airport land use compatibility plan boundaries, or, if an airport land use compatibility plan has not been adopted, for a project within two nautical miles of a public airport or public use airport, the Airport Land Use Planning Handbook published by the Division of Aeronautics of the Department of Transportation, in compliance with section 21674.5 of the Public Utilities Code and other documents, shall be utilized as technical resources to assist in the preparation of the environmental impact report as the report relates to airport-related safety hazards and noise problems.

(b) A lead agency shall not adopt a negative declaration for a project described in subdivision (a) unless the lead agency considers whether the project will result in a safety hazard or noise problem for persons using the airport or for persons residing or working in the project area.”

4.9.3 BASIS FOR DETERMINING SIGNIFICANCE

Section IX of Appendix G to the State CEQA Guidelines addresses typical adverse effects due to hazards and hazardous materials, and includes the following threshold questions to evaluate the Project’s impacts from hazards and hazardous materials (OPR, 2018a):

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- 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?
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- 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?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?



- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section IX of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact from hazards and hazardous materials if construction and/or operation of the Project would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;*
- 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;*
- Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan;*
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;*
- 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;*
- Result in an inconsistency with an Airport Master Plan;*
- Require review by the Airport Land Use Commission;*
- 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; or*
- 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.*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, which were revised to incorporate the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts due to hazards and hazardous materials. It should be noted that the issue of loss, injury, or death involving wildland fires is addressed separately in EIR Subsection 4.21, *Wildfire*.



4.9.4 IMPACT ANALYSIS

Threshold a.: *Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Threshold b.: *Would the Project 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?*

Implementation of the Project would result in the construction and long-term operation of a light industrial and business park development. The analysis below evaluates the potential for the Project to result in a substantial hazard to people or the environment due to existing site conditions, construction activities, and long-term operation.

Impact Analysis for Existing Site Conditions

As indicated above under subsection 4.9.1.B, based on the Phase I ESA prepared by Hillmann (*Technical Appendix G1*), and based on a review of historical documents, regulatory records, and site reconnaissance, the Project site was identified as having a potential REC due to the former use of the property as agricultural land, which may have contributed to accumulated pesticides in the shallow soils. No other RECs were identified in relation to the Project site. Nonetheless, due to the Project site's potential to contain accumulated pesticides in the shallow soil, Hillmann conducted a Phase II investigation. Hillmann collected sixty-eight (68) individual samples, which were then composited into seventeen (17) composite samples, and analyzed for OCPs and Title 22 Metals. Results of the OCP analysis indicated no detectable levels of OCPs. The results from heavy metal analysis indicate the samples had low, background levels of metals, which did not exceed the applicable RSLs for residential applications. (Hillmann, 2021, p. 2) As such, the proposed Project would not create a significant hazard to the public or the environment involving existing site conditions, and impacts would therefore be less than significant.

Impact Analysis for Temporary Construction-Related Activities

Heavy equipment (e.g., dozers, excavators, tractors) would be operated on the Project site during construction of the Project. This heavy equipment likely would be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be used on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the Environmental Protection Agency (EPA) and DTSC, as well as the Santa Ana Regional Water Quality Control Board (RWQCB) pertaining to water quality as discussed in Subsection 4.10, *Hydrology and Water Quality*. With



mandatory compliance with applicable hazardous materials regulations, the Project would not create significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. A less-than-significant impact would occur.

Impact Analysis for Long-Term Operation

The future occupants that would occupy the future buildings on site are not yet known. However, the future building occupant likely will include general warehousing, industrial, manufacturing, assembly, business park, and/or similar uses and it is possible that hazardous materials could be used during the course of a future building user's daily operations. State and federal Community-Right-to-Know laws allow the public access to information about the amounts and types of chemicals in use at local businesses. Laws also are in place that require businesses to plan and prepare for possible chemical emergencies. Any businesses that occupy the proposed buildings on the Project site and that handle hazardous materials (as defined in Section 25500 of California Health and Safety Code, Division 20, Chapter 6.95) would require a permit from the Riverside County Department of Environmental Health (DEH) in order to register the business as a hazardous materials handler. Such businesses also are required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting to the County of Riverside Fire Department and the State Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business. In addition, any business handling at any one time, greater than 500 pounds of solid, 55 gallons of liquid, or 200 cubic feet of gaseous hazardous material, is required, under Assembly Bill 2185 (AB 2185), to file a Hazardous Materials Business Emergency Plan (HMBEP). A HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material. The intent of the HMBEP is to satisfy federal and State Community Right-To-Know laws and to provide detailed information for use by emergency responders.

If businesses that use or store hazardous materials occupy the future buildings on the Project site, the business owners and operators would be required to comply with all applicable federal, State, and local regulations to ensure proper use, storage, use, emission, and disposal of hazardous substances (as described above). With mandatory regulatory compliance, the Project is not expected to pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials, nor would the Project increase the potential for accident conditions which could result in the release of hazardous materials into the environment. In addition, the Project would be required to comply with Riverside County Ordinance No. 651.5, which establishes specific requirements for the storage of hazardous materials and requirements for reporting and permitting the use, handling, storage, and transportation of hazardous materials.

With mandatory regulatory compliance, along with mandatory compliance with Riverside County Ordinance No. 651.5, potential hazardous materials impacts associated with long-term operation of the Project are determined to be less than significant and mitigation is not required.



Threshold c.: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?

The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. Additionally, there are no emergency response plans or emergency evacuation plans in effect in the local area. During construction and long-term operation of the Project, adequate emergency access for emergency vehicles would be required to be maintained along public streets that abut the Project site. Furthermore, improvements planned as part of the Project are not anticipated to adversely affect traffic operations in the local area, including along nearby segments of Horsethief Canyon Road. As part of the County's discretionary review process, Riverside County reviewed the Project's application materials to ensure that appropriate emergency ingress and egress would be available to-and-from the Project site and that circulation on the Project site was adequate for emergency vehicles. Additional reviews would be conducted by Riverside County as part of future implementing discretionary applications (i.e., tentative tract maps, plot plans, etc.), as well as part of future grading and building permit applications, in order to ensure adequate emergency ingress and egress are adequately accommodated. Moreover, the Project would involve the construction of Street A through the Project site, which would serve to improve emergency access in the local area. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur.

Threshold d.: Would the Project emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The nearest school to the Project site is the Luiseño Elementary School, located approximately 0.1 mile south of the Project site. As described above under the analysis for Thresholds a. and b., the use of and transport of hazardous substances or materials to and from the Project site during construction and long-term operational activities would be required to comply with applicable federal, State, and local regulations that would preclude substantial public safety hazards. Accordingly, there would be no potential for existing or proposed schools to be exposed to substantial safety hazards associated with emission, handling, or the routine transport of hazardous substances or materials to-and-from the Project site and impacts would be less than significant.

Although impacts would be less than significant with compliance to applicable federal, State, and local regulations, standard County conditions of approval are specified herein to ensure regulatory compliance, which requires the Project Applicant to provide a HMBEP (if required by law) to the Superintendent's Office and Facilities and Operations Office of the Lake Elsinore Unified School District (LEUSD). Impacts would remain less than significant.

Refer to EIR Subsection 4.3, *Air Quality*, for analysis pertaining to human health risks associated with air pollutant emissions associated with the Project, including risks to the maximally exposed school child located within one-quarter mile from the Project site. As concluded in EIR Subsection 4.3, the Project's toxic air contaminant emissions (and their associated health risks) would be less than significant.



Threshold e.: *Would the Project 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?*

Based on the results of the Project's Phase I ESA (*Technical Appendix G1*), the Project site is not located on any list of the lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Hillmann, 2019). Accordingly, no impact would occur.

Threshold f.: *Would the Project result in an inconsistency with an Airport Master Plan?*

Threshold g.: *Would the Project require review by the Airport Land Use Commission?*

Threshold h.: *For a project located within an airport land use plan or, where such a plan has not been adopted, within two 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?*

The Project site is not located within the boundaries of any Airport Master Plans, and no impact due to an inconsistency with an Airport Master Plan would occur. As previously indicated, the nearest public airport to the Project site is the Corona Municipal Airport located roughly 14.5 miles northwest of the Project site. According to Map CO-1 of the Riverside County Airport Land Use Compatibility Plan Policy Document, the Project site is located outside of the compatibility zones for the Corona Municipal Airport, indicating that the Project site is not subject to airport-related hazards. (RCALUC, 2004) As such, the Project would not require review by the Airport Land Use Commission. Additionally, due to the distance between the Project site and the Corona Municipal Airport, the Project would not result in a safety hazard for people residing or working in the Project area. Impacts would be less than significant.

Threshold i.: *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?*

As previously noted, the Project site is located approximately 8.8 miles northwest of Skylark Field, which is a private airport located within the City of Lake Elsinore (Google Earth, 2018). Due to the distance between the Project site and the Skylark Airport, as well as the limited operations that occur at the Skylark Airport, the Project would not result in a safety hazard for people residing or working in the Project area associated with private airstrips or heliports. Accordingly, no impact would occur.

4.9.5 CUMULATIVE IMPACT ANALYSIS

Because the issue of hazards and hazardous materials tends to be site-specific in nature, the cumulative study area includes existing and planned developments within a one-mile radius of the Project site. A one-mile radius is appropriate for most of the thresholds identified herein because that is the standard distance used in regulatory database searches of properties that may generate or store toxic materials. With respect to cumulatively-considerable impacts to public airport facilities, the cumulative study area includes the Project site and areas within two miles of the Project site.



As discussed under the analysis of Thresholds a. and b., the Project site does not contain any RECs under existing conditions. As such, the Project would not result in any cumulatively-considerable impacts due to existing site contamination. With respect to construction activities, the Project would be subject to compliance with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the EPA and DTSC, as well as the Santa Ana RWQCB pertaining to water quality. Other cumulative developments similarly would be subject to applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials. As such, cumulatively-considerable impacts would be less than significant. Similarly, under long-term operating conditions, future businesses on site that involve the storage or use of hazardous materials or substances would be subject to applicable federal, State, and local requirements related to hazardous materials. Other businesses within the Project's cumulative study area similarly would be required to comply with applicable federal, State, and local requirements related to hazardous materials. With mandatory regulatory compliance, along with mandatory compliance with Riverside County Ordinance No. 651.5 (or the applicable ordinances of other local agencies), potential hazardous materials impacts associated with long-term operation of the Project are determined to be less-than-cumulatively considerable.

As discussed under the analysis of Threshold c., the Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. Additionally, there are no emergency response plans or emergency evacuation plans in effect in the local area, and the Project construction activities are not anticipated to adversely affect operations of existing local roadways in the area, including Horsethief Canyon Road. Moreover, the Project would construct Street A through the Project site, which would serve to improve emergency access in the local area. Thus, there is no potential for the Project to contribute to any cumulative impacts associated with an adopted emergency response plan or emergency evacuation plan.

As previously indicated, the nearest school the Project site is the Luiseño Elementary School, located approximately 0.1 mile south of the Project site. It is possible that other businesses could be proposed in the future within close proximity to this school, and thereby could result in hazardous emissions or hazardous or acutely hazardous materials, substances, or waste. However, the Project and other cumulative developments would be required to comply with applicable federal, State, and local regulations that would preclude substantial public safety hazards. Although Project impacts would be less than significant with compliance to applicable federal, State, and local regulations, the Project would be conditioned to comply with applicable regulatory requirements, including the requirement to provide a Hazardous Materials Business Emergency Plan (HMBEP) (if required by law) to the Superintendent's Office and Facilities and Operations Office of the LEUSD. Other cumulative developments likewise would be required to prepare a HMBEP (as required by law). With implementation of the required mitigation (which merely requires compliance with applicable regulations and requirements), hazardous materials impacts to the nearby schools would be less than significant.

The Project site is not located on the list of hazardous materials sites compiled pursuant to Government Code § 65962.5; therefore, the Project has no potential to contribute to substantial, cumulative effects related to the development of contaminated sites listed on regulatory databases.



The Project site is not located within two miles of a public airport or within an airport land use plan, and there are no components of the proposed Project that would affect airport operations. Additionally, there are no private airstrips in the Project vicinity. The nearest private airport facility is the Skylark Airport, located approximately 8.8 miles southeast of the Project site within the City of Lake Elsinore. Accordingly, the Project would not result in any cumulatively-considerable impacts associated with public or private airport-related hazards.

4.9.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Thresholds a. and b.: Less-than-Significant Impact. The Project site does not contain any RECs under existing conditions. During construction of the proposed Project, compliance with applicable hazardous materials regulations would ensure that the Project would not create significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. With mandatory regulatory compliance, along with mandatory compliance with Riverside County Ordinance No. 651.5, potential hazardous materials impacts associated with long-term operation of the Project are determined to be less than significant and mitigation is not required.

Threshold c.: No Impact. The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. Additionally, there are no emergency response plans or emergency evacuation plans in effect in the local area. Improvements planned as part of the Project are not anticipated to adversely affect traffic operations in the local area, including along nearby segments of Horsethief Canyon Road. Moreover, the Project would construct a new roadway on site (i.e., Street A), which would serve to improve emergency access in the local area. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur.

Threshold d.: Less-than-Significant Impact. The Project has the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, and/or wastes within 0.25-mile of an existing school (Luiseño Elementary School). However, impacts would be less than significant with compliance with applicable federal, State, and local regulations. Although impacts would be less than significant, the Project would be conditioned to prepare a Hazardous Materials Business Emergency Plan (HMBEP) for future implementing uses, if required by law.

Threshold e.: No Impact. Based on the results of the Project's Phase I ESA (*Technical Appendix G1*), the Project site is not located on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Accordingly, no impact would occur.

Thresholds f., g., and h.: No Impact. The Project site is not located within two miles of a public airport or within an airport land use plan, and there are no components of the proposed Project that would affect airport operations. The closest airport is the Corona Municipal Airport located roughly 14.5 miles north west of the Project site. According to Map CO-1 of the Riverside County Airport Land Use Compatibility Plan Policy



Document, the Project site is located outside of the compatibility zones for the Corona Municipal Airport, indicating that the Project site is not subject to airport-related hazards. The Project site also is outside of the Airport Influence Area (AIA) for the Corona Municipal Airport. Therefore, the Project would not result in an inconsistency an Airport Master Plan, would not require review by the Airport Land Use Commission, and would not result in a safety hazard for people residing or working in the Project area. No impact would occur.

Threshold i.: No Impact. There are no private airstrips in the Project vicinity. The nearest private airport facility is the Skylark Airport, located approximately 8.8 miles southeast of the Project site within the City of Lake Elsinore. Due to the distance between the Project site and the Skylark Airport, as well as the limited operations that occur at the Skylark Airport, the Project would not result in a safety hazard for people residing or working in the Project area associated with private airstrips or heliports. Accordingly, no impact would occur.

4.9.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- All future businesses operating on the site would be subject to compliance with Riverside County Ordinance No. 651.1, which sets forth requirements for handling hazardous materials, requires a permit for handling certain types and quantities of hazardous materials, requires businesses to report their hazardous materials inventory, identifies different classifications of hazardous materials handlers, and requires reporting of spills or releases or threatened releases of a hazardous material to the Riverside County Department of Environmental Health (DEH) and to the Governor's Office of Emergency Services.
- All future contracts with construction contractors shall comply with all applicable regulations and requirements promulgated by the federal Occupational Safety and Health Administration (OSHA).
- The Project shall comply with Title 22, Division 4.5 of the California Code of Regulations, which requires residents and employees to dispose of household hazardous waste, including pesticides, batteries, old paint, solvents, used oil, antifreeze, and other chemicals, at a Household Hazardous Waste Collection Facility.
- The Project shall comply with Title 22, Division 4.5, Chapter 11 of the California Code of Regulations which requires fluorescent lamps, batteries, and mercury thermostats be recycled or taken to a Household Hazardous Waste Collection Facility.
- Prior to the issuance of any new occupancy permit for a use/user within the proposed Project's buildings, and to the extent hazardous materials are planned to exist on-site and a Hazardous Materials



Business Emergency Plan (HMBEP) is required by law, the Project Applicant shall provide a copy of its approved Emergency Response Plan to the Superintendent's Office and Facilities Office of the Lake Elsinore Unified School District outlining how the building user(s) will prevent or respond to spills or leaks of hazardous materials related to its facility/facilities and use of the Project site. If so requested, the Project Applicant shall also meet with School District and Fire Department officials to discuss emergency response procedures as contained in the HMBEP for spills or leaks at the Project site in relation to the nearby school facilities. This measure shall be implemented under the supervision of the Riverside County Planning Department, with input from the Lake Elsinore Unified School District Superintendent as appropriate. All meetings shall be documented and documentation shall be provided to the County Planning Department within 30 days of each meeting. Failure to abide by these procedures may be grounds for revocation of any plot plans or other discretionary approvals for specific warehouse uses on the Project site.

Mitigation

Impacts would be less than significant; therefore, mitigation measures are not required.



4.10 HYDROLOGY AND WATER QUALITY

The following analysis is based on a study entitled, “Preliminary Drainage Report for Renaissance Ranch Commerce Center,” prepared by K&A Engineering, Inc. (herein, “K&A”), dated February 2022, and included in this EIR as *Technical Appendix H1* (K&A, 2022a). Analysis in this Subsection also is based on a Preliminary Water Quality Management Plan (WQMP) titled, “Preliminary Project Specific Water Quality Management Plan, Renaissance Ranch Commerce Center” (herein, “WQMP”), also prepared by K&A, dated February 2022, and appended to this EIR as *Technical Appendix H2* (K&A, 2022b).

4.10.1 EXISTING CONDITIONS

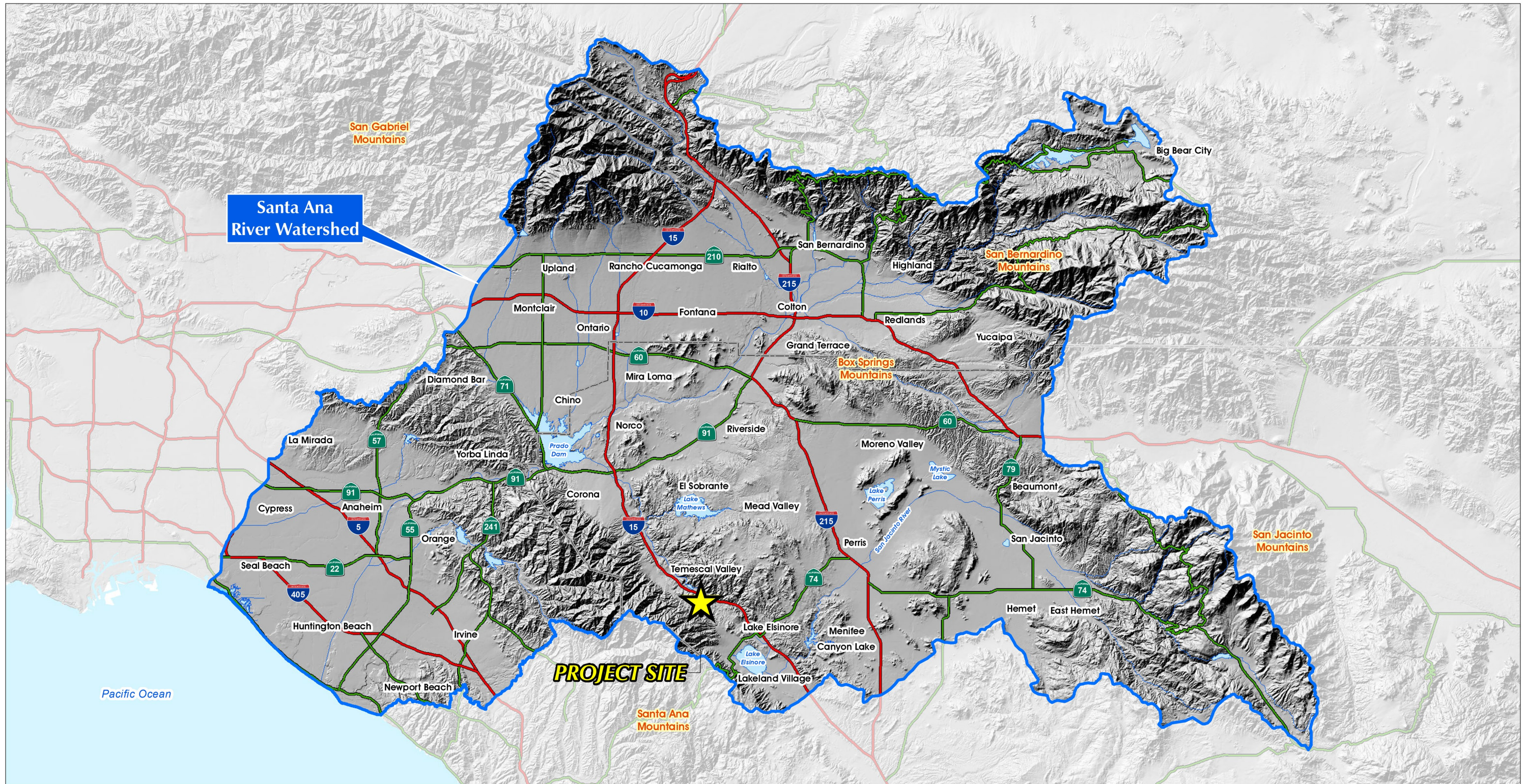
A. Regional Hydrology

The Project site is located within the Santa Ana River watershed, which drains a 2,840 square-mile area and is the principal surface flow water body within the region. The Santa Ana River flows over 100 miles and drains the largest coastal stream system in Southern California. It discharges into the Pacific Ocean at the City of Huntington Beach. The total stream length of the Santa Ana River and its major tributaries is about 700 miles. (SAWPA, 2019, p. 4-1). The Project site’s location within the Santa Ana River Watershed is depicted on Figure 4.10-1, *Santa Ana River Watershed Map*. The Project site is located within the Lee Lake Hydrologic Subarea of the Lake Mathews Hydrologic Area. (RWQCB, 2019, p. 4-33). Drainages tributary to the Project site include Lee Lake, Temescal Creek Reach 2, Temescal Creek Reach 1B, Temescal Creek Reach 1A, Temescal Creek, Santa Ana River Reach 3, and Santa Ana River Reach 2 (K&A, 2022b, Table A.1).

B. Site Hydrology

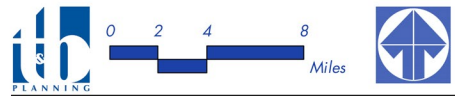
The Project site currently consists of vacant, undeveloped land is generally sloping down in northeasterly direction and is characterized by ridges and canyons, with the high point at approximately 1,430 feet above mean sea level (amsl) at the southwest corner of the Project site and a low point at approximately 1,187 feet amsl near the northeast corner of the Project site. As depicted on Figure 4.10-2, *Existing Conditions Hydrology Map*, and as summarized in Table 4.10-1, *Existing Conditions Hydrology Summary*, there are a total of 11 drainage areas within the Project site. Flows from seven (7) of these drainages are conveyed northeasterly across the I-15 freeway via existing culverts, with flows discharging into the Temescal Wash and Alberhill Creek/Temescal Wash. The remaining four (4) drainages discharge directly into Alberhill Creek. The existing drainages within the Project site are described below. (K&A, 2022a, pp. 5-7)

- **Drainage Area A1** is approximately 33.78 acres, tributary to the area western side of the Project site. This area is a Project off-site drainage area drain to an existing 42” Corrugated Steel Pipe (CSP) Caltrans culvert at Concentration Point (CP) A1.
- **Drainage Area A2** is approximately 4.74 acres and tributary to the east of Area A1, and drains into an existing 30” CSP Caltrans culvert at CP A2.
- **Drainage Area A3** is approximately 7.60 acres and tributary to the east of Area A2, and drains into an existing 36” CSP Caltrans culvert at CP A3.

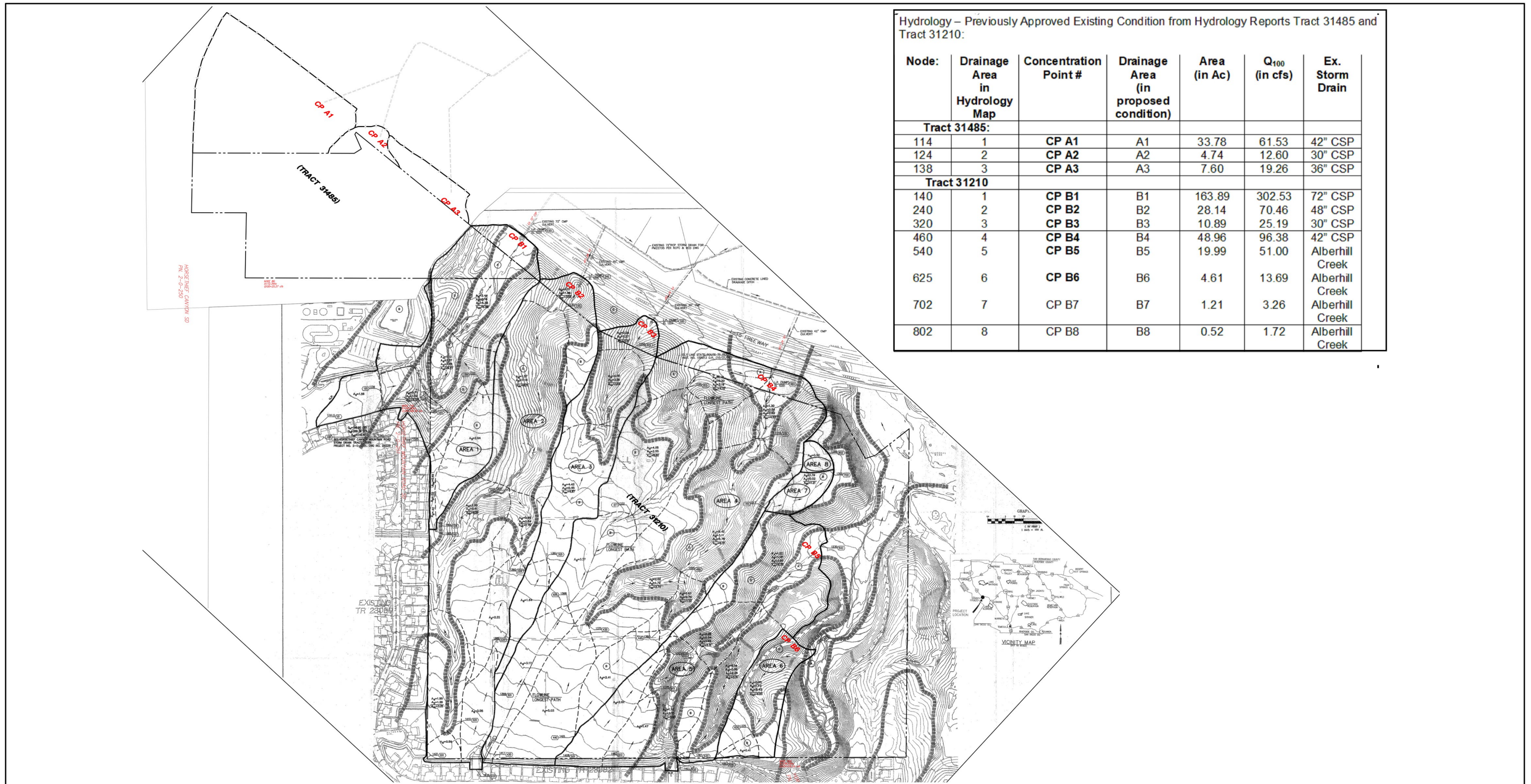


Source(s): ESRI, RCTLMA (2021)

Figure 4.10-1

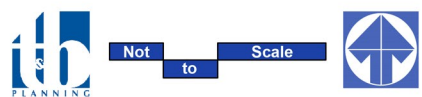


Santa Ana River Watershed Map



Source(s): K&A Engineering (09-2020)

Figure 4.10-2



Existing Conditions Hydrology Map



Table 4.10-1 Existing Conditions Hydrology Summary

Node	Drainage Area (in Proposed Condition)	Concentration Point	Area (Acres)	Peak Storm Flows (Q ₁₀₀) (cfs)	Existing Storm Drain
114	A1	CP A1	33.78	61.53	42" CSP
124	A2	CP A2	4.74	12.60	30" CSP
138	A3	CP A3	7.60	19.26	36" CSP
140	B1	CP B1	163.89	302.53	72" CSP
240	B2	CP B2	28.14	70.46	48" CSP
320	B3	CP B3	10.89	25.19	30" CSP
460	B4	CP B4	48.96	96.38	42" CSP
540	B5	CP B5	19.99	51.00	Alberhill Creek
625	B6	CP B6	4.61	13.69	Alberhill Creek
702	B7	CP B7	1.21	3.26	Alberhill Creek
802	B8	CP B8	0.52	1.72	Alberhill Creek

(K&A, 2022a, p. 6)

- **Drainage Area B1** is approximately 163.89 acres (Riverside County Flood Control and Water Conservation District [RCFCWCD] Horsethief Mountain Road storm drain) and tributary to the areas that drain into an existing 72" CSP Caltrans culvert at CP B1.
- **Drainage Area B2** is approximately 28.14 acres and tributary to the areas that drain into an existing 48" CSP Caltrans culvert at CP B2.
- **Drainage Area B3** is approximately 10.89 acres and is tributary to the areas that drain into an existing 30" CSP Caltrans culvert at CP B3.
- **Drainage Area B4** is approximately 48.96 acres and tributary to the areas that drain into an existing 42" CSP Caltrans culvert at CP B4.
- **Drainage Area B5** is approximately 19.99 acres and is tributary to the areas that drain into Alberhill Creek.
- **Drainage Area B6** is approximately 4.61 acres and is tributary to the areas that drain into Alberhill Creek.
- **Drainage Area B7** is approximately 1.21 acres and is tributary to the areas that drain into Alberhill Creek.
- **Drainage Area B8** is approximately 0.52 acres and is tributary to the areas drain into Alberhill Creek.

Additionally, it should be noted that upstream of Drainage Areas B5, B6, B7 and B8 is an area that is tributary to the RCFCWCD Horsethief Calendula Avenue storm drain (K&A, 2022a, p. 6).



C. Flood Hazards

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06065C2006G, the northeast corner of the Project site is mapped within a special flood hazard area subject to inundation by the 1% annual chance flood. Specifically, this portion of the Project site, which occur within open space Planning Area 6 of proposed SP 333A1, is located within Flood Zone “AE,” which encompasses floodplains where the base flood elevations have been determined. The remaining portions of the Project site are not located within any mapped floodplains, indicating that these areas are not subject to inundation during the 1% annual chance flood. (FEMA, 2008) Additionally, the Project site is not located within any areas subject to dam inundation hazards (Riverside County, 2021b, Figure 10)

D. Water Quality

The Project site is located within the jurisdiction of the Santa Ana Basin Regional Water Quality Control Board (RWQCB). The receiving waters of flows from the Project site include Lee Lake, Temescal Creek Reach 2, Temescal Creek Reach 1B, Temescal Creek Reach 1A, Temescal Creek, Santa Ana River Rach 3, and Santa Ana River Reach 2, as indicated in Table 4.10-2, *Receiving Waters for Storm Water Runoff from the Project Site*. Of these receiving waters, Lee Lake, Temescal Creek Reach 2, Temescal Creek Reach 1B, Temescal Creek Reach 1A, and Temescal Creek are not listed as “impaired” in accordance with the Clean Water Act 303(d) list regulations. Santa Ana River Reach 3 is listed as being impaired by copper, lead, and pathogens, while Santa Ana River Reach 2 is listed as being impaired by indicator bacteria. Impairment is typically associated with point and non-point sources of water pollutants including industrial discharge and agricultural operations, respectively. The beneficial uses of the receiving surface waters of the Project site are also summarized in Table 4.10-2. (K&A, 2022b, Table A.1)

E. Groundwater

The Project site is underlain by the Elsinore Groundwater Basin. The Elsinore Basin is an alluvial basin covering approximate 40.2 square miles, and has relatively restricted groundwater flows within the basin due to the presence of multiple fault lines. The California Department of Water Resources estimates total storage capacity in Elsinore Basin to be between 27,000 Acre-Feet (AF) and 1,840,000 AF. Management of the Elsinore Basin is currently guided by the Elsinore Groundwater Management Plan (GWMP), adopted in 2004 by the Elsinore Valley Municipal Water District (EVMWD) to help resolve the potential overdraft issues in the basin. In addition to potential overdraft, the GWMP identified the nine issues listed in Table 4.10-3, *Groundwater Management Issues in the Elsinore Basin*, as areas of concern in the Elsinore Basin. (TVWD, 2017, pp. 6-3, 6-5, and Figure 6-1)

4.10.2 APPLICABLE ENVIRONMENTAL REGULATIONS

The following is a brief description of the federal, state, and local environmental laws and related regulations related to hydrology and water quality.



Table 4.10-2 Receiving Waters for Storm Water Runoff from the Project Site

Receiving Waters	EPA 303(d) Approved List Impairments	Designated Beneficial Uses	Proximity to RARE Beneficial Use
Lee Lake	None	AGR, IND, GWR, REC1, REC2, WARM, WILD	Not a RARE water body
Temescal Creek Reach 2	None	MUN, AGR, IND, GWR, REC1, REC2, WARM, WILD	Not a RARE water body
Temescal Creek Reach 1B	None	REC1, REC2, LWARM, WILD	Not a RARE water body
Temescal Creek Reach 1A	None	AGR, IND, GWR, REC1, REC2, WARM, WILD, RARE, SPWN	17 miles
Temescal Creek	None	REC1, REC2, WARM, WILD, Intermittent-AGR, RARE, GWR, LWARM	17 miles
Santa Ana River Reach 3 (HU# 801.21)	Copper, Lead, Pathogens	AGR, GWR, REC1, REC2, WARM, WILD, RARE, SPWN	18 miles
Santa Ana River Reach 2 (HU# 801.13)	Indicator Bacteria	AGR, GWR, REC1, REC2, WARM, WILD, RARE, MUN, SPWN	20 miles

Notes: MUN = Municipal and Domestic Supply; AGR = Agricultural Supply; IND = Industrial Service Supply; GWR = Groundwater Recharge; REC1 = Water Contact Recreation; REC2 = Non-contact Water Recreation; WARM = Warm Freshwater Habitat; LWARM = Limited Warm Freshwater Habitat; RARE = Rare, Threatened or Endangered Species; SPWN = Spawning, Reproduction and Development; and WILD = Wildlife Habitat.

(K&A, 2022b, Table A.1)

Table 4.10-3 Groundwater Management Issues in the Elsinore Basin

Groundwater Management Issues		
Well construction, destruction, and abandonment policies	Compliance with drinking water regulations and Basin Plan objectives	Declining groundwater levels and storage deficit
Groundwater contamination	Doubling of water demands	Basin monitoring
Well head protection	Use of groundwater for Lake Elsinore replenishment needs	Potential of subsidence

(TVWD, 2017, Table 6-1)

A. Federal Regulations

1. Clean Water Act

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was



enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. (EPA, n.d.)

2. *Federal Flood Insurance Program*

The U.S. Congress established the National Flood Insurance Program (NFIP) with the passage of the National Flood Insurance Act of 1968. The NFIP is a Federal program enabling property owners in participating communities to purchase insurance as a protection against flood losses in exchange for State and community floodplain management regulations that reduce future flood damages. Participation in the NFIP is based on an agreement between communities and the Federal Government. If a community adopts and enforces a floodplain management ordinance to reduce future flood risk to new construction in floodplains, the Federal Government will make flood insurance available within the community as a financial protection against flood losses. This insurance is designed to provide an insurance alternative to disaster assistance to reduce the escalating costs of repairing damage to buildings and their contents caused by floods. The Federal Insurance and Mitigation Administration (FIMA) within the Federal Emergency Management Agency (FEMA) is responsible for administering the National Flood Insurance Program (NFIP) and administering programs that provide assistance for mitigating future damages from natural hazards. (FEMA, n.d.)

3. *Executive Order 11988 – Floodplain Management*

Executive Order 11988 requires federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of flood plains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. In accomplishing this objective, "each agency shall provide leadership and shall take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health, and welfare, and to restore and preserve the natural and beneficial values served by flood plains in carrying out its responsibilities" for the following actions: (FEMA, 2018)

- acquiring, managing, and disposing of federal lands and facilities;
- providing federally-undertaken, financed, or assisted construction and improvements; and
- conducting federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulation, and licensing activities.



B. State Regulations

1. Porter-Cologne Water Control Act

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code § 13000 et seq.), the policy of the State is as follows: (SWRCB, 2014)

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation.

The Porter-Cologne Act established nine Regional Water Boards (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and Regional Water Boards have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management. (SWRCB, 2014)

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The Storm Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions. (SWRCB, 2014)

The Porter-Cologne Act also implements many provisions of the Clean Water Act, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. (SWRCB, 2014) The Project site is located within the Santa Ana River Watershed, which



is within the purview of the Santa Ana Regional Water Quality Control Board (RWQCB). The Santa Ana River Basin Plan (“Basin Plan”) is the governing water quality plan for the region.

2. California Water Code

The California Water Code is the principal state law regulating water quality in California. Water quality provisions must be complied with as contained in numerous code sections including: 1) the Health and Safety Code for the protection of ground and surface waters from hazardous waste and other toxic substances; 2) the Fish and Game Code for the prevention of unauthorized diversions of any surface water and discharge of any substance that may be deleterious to fish, plant, animal, or bird life; 3) the Harbors and Navigation Code for the prevention of the unauthorized discharge of waste from vessels into surface waters; and 4) the Food and Agriculture Code for the protection of groundwater which may be used for drinking water supplies. The California Department of Fish and Wildlife (CDFW), through provisions of the Fish & Game Code (§§ 1601 - 1603) is empowered to issue agreements for any alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by CDFW. (CA Legislative Info, n.d.)

Surface water quality is the responsibility of the Regional Water Quality Control Board (RWQCB), water supply and wastewater treatment agencies, and city and county governments. The principal means of enforcement by the RWQCB is through the development, adoption, and issuance of water discharge permits. RWQCB basin plans establish water quality objectives that are defined as the limits or levels of water quality constituents or characteristics for the reasonable protection of beneficial uses of water. (CA Legislative Info, n.d.)

3. California Toxics Rule (CTR)

The California Toxics Rule (CTR) fills gap in California’s water quality standards necessary to protect human health and aquatic life beneficial uses. The CTR criteria are similar to those published in the National Recommended Water Quality Criteria. The CTR supplements, and does not change or supersede, the criteria that EPA promulgated for California waters in the National Toxics Rule (NTR). The human health NTR and CTR criteria that apply to drinking water sources (those water bodies designated in the Basin Plans as municipal and domestic supply) consider chemical exposure through consumption of both water and aquatic organisms (fish and shellfish) harvested from the water. For waters that are not drinking water sources (e.g., enclosed bays and estuaries), human health NTR and CTR criteria only consider the consumption of contaminated aquatic organisms. The CTR and NTR criteria, along with the beneficial use designations in the Basin Plans and the related implementation policies, are the directly applicable water quality standards for toxic priority pollutants in California waters. (SWRCB, 2016, pp. 14-15)

4. CDFG Code Section 1600 et seq. (Lake- or Streambed Alteration Agreement Program)

Fish and Game Code § 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: (CDFW, n.d.)

- Substantially divert or obstruct the natural flow of any river, stream, or lake;



- Substantially change or use any material from the bed, channel or bank of any river, stream, or lake;
or
- Deposit debris, waste or other materials that could pass into any river, stream, or lake.

It should be noted that "any river, stream or lake" includes those that are episodic (they are dry for periods of time) as well as those that are perennial (they flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. (CDFW, n.d.)

CDFW requires a Lake and Streambed Alteration (LSA) Agreement when it determines that the activity, as described in a complete LSA Notification, may substantially adversely affect existing fish or wildlife resources. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify a project that would eliminate or reduce harmful impacts to fish and wildlife resources. Before issuing an LSA Agreement, CDFW must comply with CEQA. (CDFW, n.d.)

5. Watershed Management Initiative (WMI)

The State and Regional Water Boards are currently focused on looking at entire watersheds when addressing water pollution. The Water Boards adopted the Watershed Management Initiative (WMI) to further their goals. The WMI establishes a broad framework overlying the numerous federal and State mandated priorities. As such, the WMI helps the Water Boards achieve water resource protection, enhancement and restoration while balancing economic and environmental impacts. (SWRCB, 2017) The integrated approach of the WMI involves three main ideas:

- Use water quality to identify and prioritize water resource problems within individual watersheds. Involve stakeholders to develop solutions.
- Better coordinate point source and nonpoint source regulatory efforts. Establish working relationships between staff from different programs.
- Better coordinate local, state, and federal activities and programs, especially those relating to regulations and funding, to assist local watershed groups. (SWRCB, 2017)

6. Sustainable Groundwater Management Act (SGMA)

The 2014 Sustainable Groundwater Management Act (SGMA) requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. The DWR categorizes the priority of groundwater basins. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline. The SGMA also requires local public agencies and Groundwater Sustainability Agencies (GSAs) in high- and medium-priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs. GSPs are detailed road maps for how groundwater basins will reach long term sustainability. (DWR, n.d.)



4.10.3 BASIS FOR DETERMINING SIGNIFICANCE

Section X of Appendix G to the State CEQA Guidelines addresses typical adverse effects to hydrology and water quality, and includes the following threshold questions to evaluate the Project's impacts (OPR, 2018a):

- Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;
- Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
- Would the project 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, in a manner which would:
 - Result in substantial erosion or siltation on or off site;
 - Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site; or
 - 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;
- In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation; or
- Would the project conflict with or otherwise obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section X of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact to hydrology and water quality if construction and/or operation of the Project would:

- a. *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*
- b. *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*
- 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?*
- d. *Result in substantial erosion or siltation on-site or off-site?*



- e. *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?*
- 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?*
- g. *Impede or redirect flood flows?*
- h. *In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?*
- i. *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist were used to evaluate the significance of the proposed Project’s impacts on hydrology and water quality.

4.10.4 IMPACT ANALYSIS

- Threshold a.:*** *Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*
- Threshold b.:*** *Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*
- Threshold i.:*** *Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Potable water service to the Project site would be provided by the EVMWD, and the Project would not involve direct groundwater extraction via existing or proposed groundwater wells. Additionally, although the Project would result in a substantial increase in impervious surfaces on the site, the total amount of runoff from the site would be similar to existing conditions, and all runoff would be conveyed to downstream facilities where groundwater infiltration would continue to occur (i.e., Temescal Creek, Santa Ana River, etc.). Thus, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impeded sustainable groundwater management of the basin. Impacts would be less than significant.

The Project site is located within the jurisdiction of the Santa Ana RWQCB. Water quality information for the Santa Ana River watershed is contained in the Santa Ana Region Basin Plan (“Basin Plan”), as most recently updated in June 2019 (RWQCB, 2019). Additionally, the Project site is located within the purview of the Elsinore Basin Groundwater Management Plan (EVMWD, 2020). The Project’s consistency with each is discussed below.



Santa Ana Region Basin Plan

The California Porter-Cologne Water Quality Control Act (§ 13000 (“Water Quality”) et seq., of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act (CWA)) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the Santa Ana RWQCB. Water quality information for the Santa Ana River watershed is contained in the Santa Ana Region Basin Plan (as most recently updated in June 2019). (RWQCB, 2019)

The CWA requires all states to conduct water quality assessments of their water resources to identify water bodies that do not meet water quality standards. Water bodies that do not meet water quality standards are placed on a list of impaired waters pursuant to the requirements of Section 303(d) of the CWA. The Project site resides within the Santa Ana Watershed and receiving waters for the property’s drainage are Lee Lake, Temescal Creek Reach 2, Temescal Creek Reach 1B, Temescal Creek Reach 1A, Temescal Creek, Santa Ana River Reach 3, and Santa Ana River Reach 2. Receiving waters listed on the Section 303(d) list include Santa Ana River Reach 3 (copper, lead, and pathogens) and Santa Ana River Reach 2 (indicator bacteria). Lee Lake, Temescal Creek Reach 2, Temescal Creek Reach 1B, Temescal Creek Reach 1A, and Temescal Creek are not listed as “impaired” in accordance with the Clean Water Act 303(d) list regulations. (K&A, 2022b, Table A.1)

Specific provision of the CWA applicable to the proposed Project is CWA Section 402, which authorizes the National Pollutant Discharge Elimination System (NPDES) permit program that covers point sources of pollution discharging to a water body. The NPDES program also requires operators of construction sites one acre or larger to prepare a Stormwater Pollution Prevention Plan (SWPPP) and obtain authorization to discharge stormwater under an NPDES construction stormwater permit.

Provided below is a discussion of the Project’s potential to conflict with the Santa Ana Region Basin Plan during both construction and long-term operation.

Construction-Related Water Quality

Construction of the proposed Project would involve clearing, grading, paving, utility installation, building construction, and landscaping activities, which would result in the generation of potential water quality pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction of the Project in the absence of any protective or avoidance measures.

Pursuant to the requirements of the Santa Ana RWQCB and the County of Riverside, the Project Applicant would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. In addition, the Project would be required to comply with the RWQCB’s Basin Plan. Compliance with the NPDES permit and the Basin Plan involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP is required to specify the Best Management Practices (BMPs) that the Project would be required to implement during



construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Mandatory compliance with the SWPPP would ensure that the proposed Project does not violate any water quality standards or waste discharge requirements during construction activities. Therefore, with mandatory adherence to the future required SWPPP, runoff associated with Project-related construction activities would not conflict with the Santa Ana Region Basin Plan requirements, and impacts would be less than significant.

Operational Water Quality Impacts

As noted above, receiving waters for the property's drainage are Lee Lake, Temescal Creek Reach 2, Temescal Creek Reach 1B, Temescal Creek Reach 1A, Temescal Creek, Santa Ana River Reach 3, and Santa Ana River Reach 2. Receiving waters listed on the Section 303(d) list include Santa Ana River Reach 3 (copper, lead, and pathogens) and Santa Ana River Reach 2 (indicator bacteria). Lee Lake, Temescal Creek Reach 2, Temescal Creek Reach 1B, Temescal Creek Reach 1A, and Temescal Creek are not listed as "impaired" in accordance with the Clean Water Act 303(d) list regulations. (K&A, 2022b, Table A.1) In order to assess the Project's potential for water quality impacts, Project-specific WQMP was prepared for the Project and is included as *Technical Appendix H2*.

To meet NPDES requirements, the Project's proposed storm drain system would be designed to runoff to a series of proposed extended detention basins, with portions of the runoff tributary to the Project site being directed towards landscaped and open space areas. The proposed extended detention basins would be designed to detain runoff and provide water quality treatment, and would reduce pollutants of concern in runoff leaving the Project site, such as bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash/debris, and oil/grease. (K&A, 2022b, p. 20) Because all runoff generated on site would be appropriately treated prior to ultimate discharge into downstream receiving waters, the proposed Project would not conflict with the Santa Ana Region Basin Plan, and impacts would therefore be less than significant.

Elsinore Basin Groundwater Management Plan

The EVMWD prepared the Elsinore Basin Groundwater Management Plan (EBGMP) in June 2003. The objective of the EBGMP is to provide an evaluation of the groundwater basin and develop a reliable groundwater supply to meet drought and dry season demands through the year 2020. The area covered by the EBGMP consists of approximately 42 square miles, of which about 25 square miles are located within the basin floor including Lake Elsinore (5 square miles). (EVMWD, 2020, p. ES-1)

The EBGMP indicates that outflows from the Elsinore Basin exceed the inflows. If this condition were to continue in the future, the basin may become overdrafted. Strategies identified by the EBGMP include the following (EVMWD, 2020, p. ES-8):

- Store imported water by using dual purpose wells
- Increase local supplies by using spreading basins
- Store imported water by using spreading basins
- Store groundwater for dry years by using in-lieu recharge



- Develop new sources of supply
- Reduce supply needs through water conservation
- Measure progress through basin monitoring
- Stakeholder involvement
- Protect groundwater quality by developing programs and policies

To achieve these strategies, the EBGMP identifies a total of four alternatives in order to meet the projected 2020 demands and maintain Lake Elsinore at a level of 1,240 feet amsl. The preferred alternative identified in the EBGMP is Alternative 4, which is intended to achieve a balanced groundwater basin using a combination of water conservation, dual-purpose wells for basin recharge, the use of recycled water as the primary source for lake replenishment, and a basin monitoring program. The basin management identified in the EBGMP is concluded to initiate a proactive approach to groundwater management in the Elsinore Basin and allow the Elsinore Valley to grow and double its demands over future years, while maintaining a reliable, affordable, and sustainable water supply. (EVMWD, 2020, pp. ES-13, ES-20, and ES-25)

There are no existing groundwater wells on the Project site, and the proposed Project would not entail the construction of any wells on site. As such, the Project would not directly extract groundwater, but would instead obtain potable water from the EVWMD, which relies in part on groundwater resources. Accordingly, the Project only would have the potential to conflict with the EBGMP if the Project were to obstruct infiltration of runoff into the groundwater basin, or if the Project were to contribute to or exacerbate existing water quality problems within the basin.

As noted above under the discussion of the Project's consistency with the Santa Ana Region Basin Plan, the Project Applicant would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. Compliance with the NPDES permit and the Basin Plan involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP is required to specify the BMPs that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Mandatory compliance with the SWPPP would ensure that construction of the proposed Project does not result in polluted runoff that could adversely affect water quality within the Elsinore Groundwater Basin. Additionally, the total amount of runoff from the Project site during construction would not change substantially in relation to existing conditions, thereby continuing to allow for infiltration into the Elsinore Groundwater Basin. Accordingly, during construction the Project would not conflict with the EBGMP, and a less-than-significant impact would occur.

Following construction activities, infiltration on the Project site largely would be precluded and would be limited to landscaped and open space areas, as remaining areas of the site would be covered with impervious surfaces (i.e., buildings, drive aisles, etc.). However, under existing conditions all runoff generated on and tributary to the Project site is conveyed directly or indirectly (i.e., through culverts under I-15) to the Temescal



Wash. While a nominal amount of groundwater recharge may occur under existing conditions, the majority of runoff is conveyed to downstream facilities, which ultimately include unlined drainage channels and bodies of water (i.e., Temescal Creek, Santa Ana River, etc.) wherein groundwater recharge occurs. These conditions would not substantially change under the proposed Project. Groundwater recharge would continue to occur downstream, as it does under existing conditions.

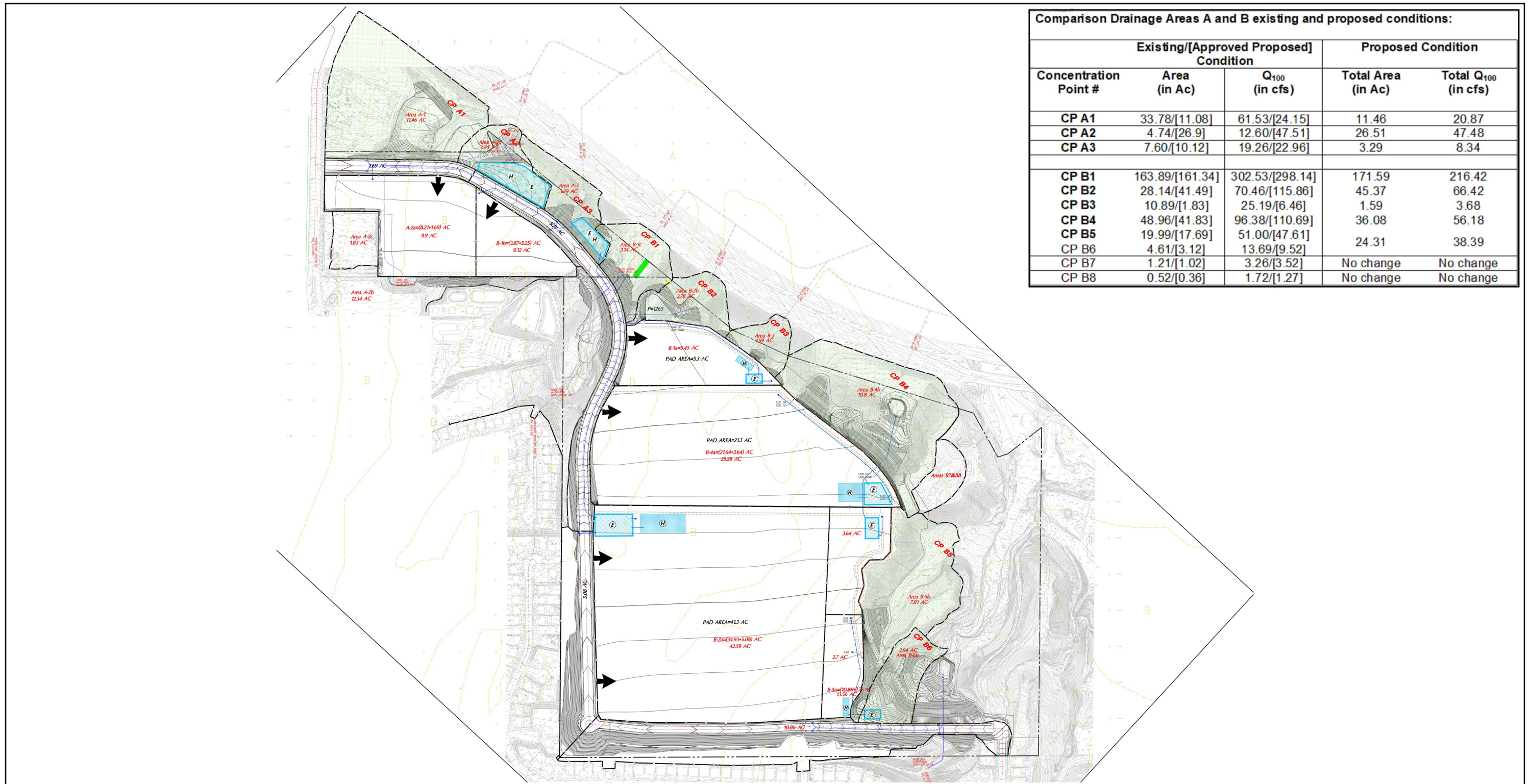
With respect to groundwater quality under long-term operations, the Project Applicant would be required to identify measures to reduce pollutants in runoff from the Project site pursuant to the applicable NPDES permit requirements. Measures identified to address water quality are identified as part of the Project’s WQMP (*Technical Appendix H2*). These measures include routing first flush flows on the Project site towards a series of extended detention basins. Treatment provided by the extended detention basins would be effective in treating pollutants of concern in runoff leaving the Project site, such as bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash/debris, and oil/grease (K&A, 2022b, p. 20). With mandatory compliance with the Project’s WQMP, the Project would not contribute substantial amounts of polluted runoff towards the Elsinore Groundwater Basin. As such, the proposed Project would not conflict with or interfere with implementation of the EBGMP, and impacts would therefore be less than significant.

Threshold c.: *Would the Project 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?*

Threshold f.: *Would the Project 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?*

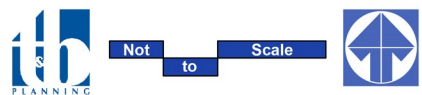
Figure 4.10-3, *Proposed Conditions Hydrology Map*, depicts the Project’s proposed drainage conditions. Implementation of the proposed Project would require extensive grading in order to establish suitable pads for light industrial and business park development. However, and as depicted on Figure 4.10-3, grading proposed as part of the Project generally would maintain the site’s existing drainage patterns, with runoff continuing to flow in a generally northeasterly direction towards the Temescal Wash, either directly or via existing culverts beneath I-15. Thus, the Project would not substantially alter the existing drainage pattern of the Project site or surrounding areas, and impacts would be less than significant.

With implementation of the proposed Project, a majority of the Project site would be developed with impervious surfaces, with exception of proposed open space and landscaped areas. As previously indicated, runoff from the developed portions of the Project site is proposed to be routed to a series of extended detention basins on site, which would detain peak storm flows and provide water quality treatment. Table 4.10-4, *Comparison of Existing and Proposed Drainage Conditions*, provides a comparison between the site’s existing peak storm flows from the Project site and the peak storm flows anticipated with development of the Project as proposed. As shown, the proposed extended detention basins would reduce the total peak flows from the Project site from 657.62 cubic feet per second (cfs) under existing conditions to 462.76 cfs under post-development conditions. As such, implementation of the proposed Project would not result in an increase in



Source(s): K&A Engineering (09-2020)

Figure 4.10-3



Proposed Conditions Hydrology Map



Table 4.10-4 Comparison of Existing and Proposed Drainage Conditions

Concentration Point (CP)	Existing Conditions		Proposed Conditions	
	Area (Acres)	Peak Storm Flows (Q100) (cfs)	Area (Acres)	Peak Storm Flows (Q100) (cfs)
CP A1	33.78	61.53	11.46	20.87
CP A2	4.74	12.60	26.51	47.48
CP A3	7.60	19.26	3.29	8.34
CP B1	163.89	302.53	171.59	216.42
CP B2	28.14	70.46	45.37	66.42
CP B3	10.89	25.19	1.59	3.68
CP B4	48.96	96.38	36.08	56.18
CP B5	19.99	51.00	24.31	38.39
CP B6	4.61	13.69		
CP B7	1.21	3.26	1.21	3.26
CP B8	0.52	1.72	0.52	1.72
Totals:	324.33	657.62	321.93	462.76

(K&A, 2022a, p. 20)

peak runoff from the Project site and therefore would not result in the alteration of the existing alignment of the Temescal Wash or any other downstream receiving waters. Additionally, because existing drainage facilities downstream are adequately sized to accommodate peak runoff from the Project site and surrounding areas under existing conditions, and because peak runoff from the Project site would be reduced with development of the Project site as proposed, the Project would not contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.

With respect to water quality, please refer to the analysis of Thresholds a., b, and i. As indicated in the analysis, with implementation of the Project’s proposed drainage system, the Project would not generate substantial additional sources of polluted runoff. Accordingly, impacts to water quality would be less than significant.

Threshold d.: Would the Project result in substantial erosion or siltation on-site or off-site?

A. Construction-Related Erosion Impacts

The Project has been designed to generally maintain the existing drainage patterns of the Project site. Nonetheless, construction of the proposed Project would involve substantial ground disturbance during clearing and grading of the site. In addition, on-site erosion could occur if graded slopes are not stabilized prior to ultimate development or landscaping. The proposed grading activities would generate silt which could be carried off-site during a heavy rainfall event. Should such an event occur in the absence of any preventative measures to contain silt and other soils on-site, erosion and/or siltation downstream could result.

However, pursuant to requirements of the SWRCB, the Project Applicant would be required to obtain a NPDES permit for construction activities on-site. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one (1) acre of total



land area. Compliance with the NPDES permit involves the preparation and implementation of a SWPPP for construction related activities. The SWPPP would specify BMPs to minimize the potential for erosion and siltation to occur and would include specific Project site measures to address the potential for the caving in of temporary excavations. Typical BMPs that are implemented at construction sites to protect water quality include the implementation of straw bale barriers, plastic sheeting/erosion control blankets, and outlet protection measures. With mandatory adherence to the SWPPP requirements, effects associated with construction-related erosion, siltation, water quality, and flooding on downstream water sources and flood control systems would be maintained at a level below significance.

B. Post-Development Erosion Impacts

Implementation of the proposed Project would result in the conversion of the site from undeveloped land to that of a proposed business park and light industrial development. With development of the Project site, large portions of the Project site would consist of impervious surfaces, with areas of pervious surfaces largely confined to landscaped and open space areas. Thus, the potential for erosion hazards on site would be substantially decreased as compared to existing conditions with buildout of the Project site. As such, long-term erosion impacts on site would be less than significant.

However, due to the increase in impervious surfaces on site, runoff from the site following development has the potential to contribute to erosion hazards downstream. As previously shown in Table 4.10-4, the proposed extended detention basins would reduce the total peak flows from the Project site from 657.62 cfs under existing conditions to 462.76 cfs under post-development conditions. As such, and as compared to the existing condition, the Project would not result in an increase in peak runoff from the site, and therefore runoff from the Project site would not cause or contribute to any increased erosion hazards downstream. Impacts would be less than significant.

Threshold e.: Would the Project substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?

Future implementing developments on the Project site would implement stormwater drainage systems, which would include catch basins, underground storm drain lines, and extended detention basins. The future drainage systems would be designed in a manner that would preclude potential flood hazards on site, in accordance with standard County requirements. Additionally, and as discussed in more detail under the analysis of Thresholds c. and f., the proposed extended detention basins would reduce the total peak flows from the Project site from 657.62 cfs under existing conditions to 462.76 cfs under post-development conditions (refer also to Table 4.10-4). As such, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site, and impacts would be less than significant.

Threshold g.: Would the Project impede or redirect flood flows?

According to FEMA FIRM No. 06065C2006G, the northeast corner of the Project site is mapped within a special flood hazard area subject to inundation by the 1% annual chance flood (Flood Zone “AE”), while the remaining portions of the Project site occur in areas that are not subject to inundation during the 1% annual



chance flood (FEMA, 2008). The portions of the Project site that are mapped within Flood Zone “AE” occur within Planning Area 6 of proposed SP 333A1, which is proposed for long-term conservation as natural open space. The Project would not involve any development or disturbances within areas mapped within Flood Zone “AE,” and all grading and development proposed as part of the Project would occur in areas that are not located within a flood plain. Accordingly, the Project would not impede or redirect flood flows, and no impact would occur.

Threshold h.: In flood hazard, tsunami, or seiche zones, would the Project risk the release of pollutants due to Project inundation?

The Project site is located approximately 24 miles northeast of the Pacific Ocean, and as such there is no potential for the Project site to be inundated with tsunamis. According to Figure 10 of the Elsinore Area Plan (EAP), the Project site is not located within the dam inundation area for any bodies of water, including the Railroad Canyon Dam located in the City of Canyon Lake. As such, it can be concluded that the Project site also would not be subject to seiche hazards associated with Canyon Lake. Additionally, and as discussed more fully under the analysis of Threshold g., areas planned for development on site are not located in areas subject to inundation during the 1% annual chance flood. Accordingly, the Project would not risk the release of pollutants due to inundation from floods, tsunamis, or seiches, and no impact would occur.

4.10.5 CUMULATIVE IMPACT ANALYSIS

The cumulative impact analysis considers construction and operation of the proposed Project in conjunction with other development projects in the vicinity of the Project site and resulting from full buildout of the Riverside County General Plan and the general plans of local jurisdictions that are located within the Santa Ana River watershed.

As discussed under the analysis of Thresholds a., b., and i., the Project would result in less-than-significant impacts to surface and groundwater quality during construction because the Project Applicant would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. Compliance with the NPDES permit and the Basin Plan involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP is required to specify the BMPs that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Other cumulative developments within the cumulative study area also would be required to comply with the NPDES Municipal Stormwater Permit and would be required to implement BMPs during construction activities to preclude water quality impacts that could impair downstream waters or groundwater. As such, construction-related water quality impacts, as well as impacts due to a conflict with the Santa Ana Region Basin Plan and the Elsinore Basin Groundwater Management Plan, would be less-than-cumulatively considerable. With respect to long-term impacts to water quality, the Project’s proposed storm drain system would be designed to route first flush runoff to landscaped areas and a series of extended detention basins. The extended detention basins would be designed to detain runoff and provide water quality treatment, and would reduce pollutants of concern in runoff leaving the Project site, such as bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash/debris, and oil/grease. Other cumulative developments would similarly be required to



incorporate BMPs to treat water quality pollutants of concern. Accordingly, the Project's contribution to cumulatively-considerable impacts would be less than significant.

As indicated under the analysis of Thresholds c. and f., although extensive grading would be required to implement the proposed Project, grading proposed as part of the Project generally would maintain the site's existing drainage patterns, with runoff continuing to flow in a generally northeasterly direction towards the Temescal Wash, either directly or via existing culverts beneath I-15. As such, the Project would not substantially alter the existing drainage pattern of the Project site or surrounding areas, and impacts would be less than significant on a cumulatively-considerable basis. Additionally, and as previously shown in Table 4.10-4, the proposed extended detention basins would reduce the total peak flows from the Project site from 657.62 cfs under existing conditions to 462.76 cfs under post-development conditions. As such, implementation of the proposed Project would not result in an increase in peak runoff from the Project site and therefore would not result in the alteration of the existing alignment of the Temescal Wash or any other downstream receiving waters on either a direct or cumulatively-considerable basis. Additionally, because the Project would result in a decrease in peak runoff from the Project site, the Project would not contribute runoff water that could exceed the capacity of existing or planned stormwater drainage systems, and the Project would not contribute to any cumulatively-considerable impacts.

As discussed under the analysis of Threshold d., during construction the Project would be subject to compliance with the applicable NPDES permit, which requires the preparation and implementation of a SWPPP to address erosion hazards associated with construction activities. Other cumulative developments similarly would be required to prepare and implement a SWPPP. As such, erosion-related hazards during construction activities would be less-than-cumulatively considerable. Additionally, implementation of the proposed Project would result in the conversion of the site from undeveloped land to that of a proposed business park and light industrial development. With development of the Project site, large portions of the Project site would consist of impervious surfaces, with areas of pervious surfaces largely confined to landscaped areas. Thus, the potential for erosion hazards on site would be substantially decreased as compared to existing conditions with buildout of the Project site. Additionally, because peak runoff from the Project site would decrease as compared to existing conditions, the Project has no potential to cause or cumulatively contribute to erosion hazards downstream. As such, the Project would not contribute to any cumulatively-considerable impacts due to long-term erosion.

As discussed in more detail under the analysis of Thresholds c. and f., the proposed extended detention basins would reduce the total peak flows from the Project site from 657.62 cfs under existing conditions to 462.76 cfs under post-development conditions (refer also to Table 4.10-4). Because the Project would result in a reduction in peak flows, the Project would not cumulatively contribute to increased flood hazards off site. Accordingly, the Project's contribution to cumulatively-considerable impacts associated with off-site flood hazards would be less than significant.

Areas proposed for development with light industrial and business park uses in areas that are not subject to inundation during the 1% annual chance flood. As such, the Project would not impede or redirect flood flows, and the Project would not contribute to any cumulatively-considerable impacts.



Areas planned for development with light industrial and business park land uses are not subject to inundation due to floods, tsunamis, or seiche zones. As such, cumulatively-considerable impacts associated with the release of pollutants due to Project site inundation would not occur.

4.10.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Thresholds a., b., and i.: Less-than-Significant Impact. The Project would be served potable water by the EVMWD, and does not propose any groundwater wells on site; thus, Project direct impacts to groundwater supplies would be less than significant. Additionally, the total amount of runoff from the site would not change with Project development, and as such Project-related runoff would be conveyed to downstream facilities where groundwater recharge would continue to occur. Additionally, water quality impacts during construction, including potential impacts due to a conflict with the Basin Plan and the EBGMP, would be less than significant. In addition, with implementation of the proposed Project, all runoff generated on site would be appropriately treated by the Project's BMPs prior to ultimate discharge into the Temescal Wash, the Project would not adversely affect surface or groundwater quality. Accordingly, the proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality; would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge; and would not conflict with the Santa Ana Region Basin Plan or the Elsinore Basin Groundwater Management Plan. Impacts would be less than significant.

Thresholds c. and f.: Less-than-Significant Impact. Grading proposed as part of the Project generally would maintain the site's existing drainage patterns, with runoff continuing to flow in a generally northeasterly direction towards the Temescal Wash, either directly or via existing culverts beneath I-15. In addition, the proposed extended detention basins would reduce the total peak flows from the Project site from 657.62 cfs under existing conditions to 462.76 cfs under post-development conditions. As such, implementation of the proposed Project would not result in an increase in peak runoff from the Project site and therefore would not result in the alteration of the existing alignment of the Temescal Wash or any other downstream receiving waters. Additionally, because existing drainage facilities downstream are adequately sized to accommodate peak runoff from the Project site and surrounding areas under existing conditions, and because peak runoff from the Project site would be reduced with development of the Project site as proposed, the Project would not contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.

Threshold d.: Less-than-Significant Impact. With mandatory adherence to the SWPPP requirements, effects associated with construction-related erosion, siltation, water quality, and flooding on downstream water sources and flood control systems would be maintained at a level below significance. With development of the Project site, large portions of the Project site would consist of impervious surfaces, with areas of pervious surfaces largely confined to landscaped areas. Thus, the potential for erosion hazards on site would be substantially decreased as compared to existing conditions with buildout of the Project site. As such, long-term erosion impacts would be less than significant.



Threshold e.: Less-than-Significant Impact. Future implementing developments on the Project site would implement stormwater drainage systems, which would include catch basins, underground storm drain lines, and extended detention basins. The future drainage systems would be designed in a manner that would preclude potential flood hazards on site, in accordance with standard County requirements. Additionally, the proposed extended detention basins would reduce the total peak flows from the Project site from 657.62 cfs under existing conditions to 462.76 cfs under post-development conditions. As such, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site, and impacts would be less than significant.

Threshold g.: No Impact. According to FEMA FIRM No. 06065C2006G, the northeast corner of the Project site is mapped within a special flood hazard area subject to inundation by the 1% annual chance flood (Flood Zone “AE”), while the remaining portions of the Project site occur in areas that are not subject to inundation during the 1% annual chance flood. The portions of the Project site that are mapped within Flood Zone “AE” occur within Planning Area 6 of proposed SP 333A1, which is proposed for long-term conservation as natural open space. The Project would not involve any development or disturbances within areas mapped within Flood Zone “AE,” and all grading and development proposed as part of the Project would occur in areas that are not located within a flood plain. Accordingly, the Project would not impede or redirect flood flows, and no impact would occur.

Threshold h.: No Impact. The Project site is located approximately 24 miles northeast of the Pacific Ocean, and as such there is no potential for the Project site to be inundated with tsunamis. According to Figure 10 of the EAP, the Project site is not located within the dam inundation area for any bodies of water, including the Railroad Canyon Dam located in the City of Canyon Lake. As such, it can be concluded that the Project site also would not be subject to seiche hazards associated with Canyon Lake. Additionally, and as discussed more fully under the analysis of Threshold g., areas planned for development on site are not located in areas subject to inundation during the 1% annual chance flood. Accordingly, the Project would not risk the release of pollutants due to inundation from floods, tsunamis, or seiches, and no impact would occur.

4.10.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA’s definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- The Project Applicant is required to comply with the provisions of the Project’s NPDES permit, and the Project’s SWPPP. Compliance with the NPDES permit and the SWPPP would identify and implement an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate discharge to surface water from storm water and non-storm water discharges.



Mitigation

Impacts to hydrology and water quality would be less than significant; therefore, mitigation measures are not required.



4.11 LAND USE AND PLANNING

This Subsection discusses consistency of the proposed Project with applicable land use and planning policies adopted by Riverside County and other governing agencies for the purpose of reducing adverse effects on the physical environment. This Subsection also addresses present and future land uses, zoning, and the physical arrangement of uses on the land. Information used to support the analysis in this Subsection was also obtained in part from the Riverside County General Plan (Riverside County, 2021a), the Riverside County Elsinore Area Plan (EAP) (Riverside County, 2021b), and the Riverside County GIS database (RCIT, 2021). Additionally, this Subsection relies in part on a separate analysis of the Project’s consistency with the Riverside County General Plan and EAP, which is included as *Technical Appendix I* to this EIR. Refer to EIR Subsection 7.0, *References*, for a complete list of reference sources.

4.11.1 EXISTING CONDITIONS

Under existing conditions, the 157.1-acre Project site is vacant and undeveloped, but was partially used for agricultural uses including orchards from as early as the 1960s to around 1997 (Hillmann, 2019). There are no structures on site under existing conditions. A majority of the Project site consists of relatively level terrain with some small rolling hill forms, with existing drainages traversing the northwestern and eastern portions of the site. The westernmost portion of the Project site, near Horsethief Canyon Road, appears to be utilized as a staging area for construction materials.

As previously shown on EIR Figure 2-3, *Surrounding Land Uses and Development*, lands to the south of the Project site include medium-density residential uses and an elementary school (Luiseño Elementary School). To the west of the Project site are medium-density residential uses, a recreational facility (Horsethief Canyon Park), and the Horsethief Canyon Wastewater Treatment Plant (WTP), with undeveloped lands occurring west of the northwestern Project boundary. To the north of the Project site are several rural residences, a small area of open space and I-15, beyond which are several light industrial/business park uses and open space. To the east of the Project site are several rural residential dwelling units, open space, and an existing construction storage yard. The City of Lake Elsinore boundary occurs immediately southeast of the Project site.

A. Existing On-Site and Surrounding Land Use Designations

The prevailing planning document for the Project site and its surrounding area is the Riverside County General Plan. The Project site is located within the Elsinore Area Plan (EAP) of the Riverside County General Plan, and is located within the boundaries of the Renaissance Ranch Specific Plan (SP 333). As previously depicted on EIR Figure 2-4, the General Plan and EAP designate the 157.1-acre Project site for “Community Development – Medium Density Residential (MDR)” land uses, consistent with the adopted SP 333. The MDR land use designation allows for single-family residential development at a density range of 2 to 5 dwelling units per acre (du/ac). (Riverside County, 2021b, Table 1)

As also depicted previously on EIR Figure 2-4, lands to the west and south of the Project site are designated for MDR land uses, with lands to the west of the northwestern portion of the Project site designated for “Medium-High Density Residential (MHDR)” and “Open Space – Recreation (OS-R)” land uses. Lands to



the north of the Project site and south of I-15 are designated for “Commercial Retail (CR)” land uses, with areas north of and abutting the I-15 designated for “Light Industrial (LI)” and “Open Space – Conservation Habitat (OS-CH)” land uses. Lands to the east of the Project site are designated for “Rural Residential (RR)” and “Open Space – Water (OS-W)” land uses, with a small area designated for LI land uses. Areas to the southeast of the Project site are located within the City of Lake Elsinore and are designated by the Lake Elsinore General Plan for “Low Density Residential” uses. The MHDR land use designation allows for single-family attached and detached residences with a density range of 5 to 8 dwelling units per acre. The OS-R land use designation allows for recreational uses including parks, trails, athletic fields, and golf courses. The CR land use designation allows for local and regional serving retail and service uses. The LI land use designation allows for industrial and related uses including warehousing/distribution, assembly and light manufacturing, repair facilities, and supporting retail uses. The OS-CH land use designation applies to public and private lands conserved and managed in accordance with adopted Multi Species Habitat and other Conservation Plans and in accordance with related Riverside County policies. The RR land use designation allows for single-family residences with a minimum lot size of 5 acres and limited agricultural uses. The OS-W land use designation includes bodies of water and natural or artificial drainage corridors, and also allows for mineral resources extraction. The City of Lake Elsinore land use designation of “Low Density Residential” allows for single-family detached homes at a maximum density between 1 and 3 dwelling units per acre (du/ac), secondary residential units, hobby farming and keeping of animals, public and quasi-public uses, and similar and compatible uses. (Riverside County, 2021b, Figure 3 and Table 1; Lake Elsinore, 2011a, Figure 2.1A and p. 2-14)

B. Renaissance Ranch Specific Plan No. 333 (SP 333)

The Renaissance Ranch Specific Plan No. 333 (SP 333) was approved by the Riverside County Board of Supervisors in 2005 and encompasses the 157.1-acre Project site. As previously depicted on EIR Figure 2-5, the adopted SP 333 allows for up to 355 Medium Density Residential dwelling units on 98.7 acres, with minimum lot sizes ranging from 5,000 s.f. to 8,000 s.f. in size; a Community Park on 4.3 acres; four pocket parks on 2.0 acres; Open Space/Conservation land uses on 27.1 acres; and Open Space/Drainage uses on 25.7 acres. (Riverside County, 2005)

C. Existing On-Site and Surrounding Zoning Classifications

The Riverside County Zoning Ordinance is intended to implement the Riverside County General Plan’s land use plan. Under existing conditions, the 157.1-acre Project site is zoned for “Specific Plan Zone (SP Zone),” indicating that the property is within the boundaries of the adopted SP 333. Thus, under existing conditions the Project site is subject to the zoning classifications established by the adopted SP 333, which conform to the General Plan, EAP, and SP 333 land use designations applied to the site, as described above.

Lands to the west and south of the Project site primarily are zoned for SP Zone, as these lands occur within the Horsethief Canyon Specific Plan (Specific Plan No. 152), which primarily allows for MDR and MHDR land uses. A small area to the west of the northwestern corner of the Project site is zoned for “Rural Residential (R-R)” land uses. Lands to the north of the northwestern portion of the Project site, and south of I-15, also are zoned for R-R land uses, while areas north of I-15 are zoned for “Manufacturing-Service Commercial (M-



SC)” and “Watercourse, Watershed & Conservation Areas (W-1)” land uses. Lands to the east of the Project site are zoned W-1, M-SC, R-R, and “Residential Agricultural, 5-acre Minimum Lot Size (R-A-5).” Lands to the southeast of the Project site occur within the City of Lake Elsinore, which zones these areas for “Low Medium Density Residential (LMD)” land uses. (RCIT, 2021; Lake Elsinore, 2015)

D. Applicable Land Use and Planning Policies

1. Riverside County General Plan

The Riverside County General Plan is a policy document that reflects the County’s vision for the future of Riverside County. The General Plan was comprehensively revised in 2003 and most recently updated in 2020. The General Plan is organized into nine separate elements, including Land Use, Circulation, Multipurpose Open Space, Safety, Noise, Housing, Air Quality, Healthy Communities, and Administration. Each General Plan Element is instrumental to achieving the County’s long-term development goals. Each element contains a series of policies that guide the course of action the County must take to achieve the County’s vision for future development. (Riverside County, 2021a)

In addition, the General Plan divides the County into 19 Area Plans. The purpose of these Area Plans is to provide more detailed land use and policy direction regarding local issues such as land use, circulation, open space, and other topical areas. The Project site is located within the Elsinore Area Plan (EAP) of the General Plan. The EAP was most recently updated on August 4, 2020. The following section provides a summary of each General Plan Element, while the EAP is discussed below in subsection 4.11.1.D.2. (Riverside County, 2021b)

Land Use Element

The General Plan Land Use Element functions as a guide to planners, the general public, and decision makers as to the ultimate pattern of development. The Land Use Element designates the general distribution, general location, and extent of land uses, such as housing, business, industry, open space, agriculture, natural resources, recreation, and public/quasi-public uses. These designations are reflected on the General Plan Land Use Map, which categorizes individual parcels of land into five basic categories (“Foundation Components”): Rural, Rural Community, Community Development, Agriculture, and Open Space. As reflected on the General Plan Land Use Map, the Land Use Element provides for a balanced mixture of land uses, including commercial, office, industrial, agriculture, and open space. For each of the various land use designations, the General Plan provides standards for residential density and non-residential intensity, and provides specific policies intended to ensure that product types, densities, and intensities respond to a multitude of market segments. The Land Use Element governs how land is to be utilized; therefore, many of the issues and policies contained in other plan elements are linked in some degree to this element. The Project site is currently located within an adopted Specific Plan that is located within the Community Development Foundation Component. The Project site is designated by the General Plan Land Use Plan for MDR land uses. The Project Applicant proposes a mixture of light industrial and business park land uses; thus, a General Plan Foundation Component Amendment is not required for the proposed Project as the



proposed light industrial and business park land uses also fall under the Community Development Foundation Component. (Riverside County, 2021a, p. LU-1)

Circulation Element

The purpose of the Circulation Element is to provide for the movement of goods and people, including pedestrians, bicycles, transit, train, air, and automobile traffic flows within and through the community. Efficient traffic circulation is important to economic viability and the creation and preservation of a quality living environment (Riverside County, 2021a, p. C-1). The Circulation Element designates future road improvements and extensions; addresses non-motorized transportation alternatives; and identifies funding options. The various roadway improvements and extensions contemplated by the Circulation Element are reflected on the General Plan Circulation Plan. The various roadway classifications depicted on the Circulation Plan correspond to specific roadway cross-sections, which provide specific standards for right-of-way widths, lane configurations, medians, and landscaping requirements. As previously shown on EIR Figure 2-9, *Elsinore Area Plan Circulation Plan*, the Riverside County General Plan and EAP classify Horsethief Canyon Road as a “Secondary (100’ ROW)” facility. De Palma Road west of Horsethief Canyon Road and Temescal Canyon Road are classified as a “Major (118’ ROW)” facilities. Lake Street, which occurs within the City of Lake Elsinore, is classified as an “Urban Arterial (152’ ROW).” (Riverside County, 2021b, Figure 7)

As previously shown on EIR Figure 2-10, *Elsinore Area Plan Trails and Bikeway System*, the General Plan and EAP do not identify any planned trails or bikeways within the Project site. A “Community Trail” is planned along the southern and western boundaries of the Project site, and along the site’s frontage with Horsethief Canyon Road. (Riverside County, 2021b, Figure 8)

Multipurpose Open Space Element

The Multipurpose Open Space Element addresses forms of open space in the County, including scenic, habitat, and recreation. This element has the purpose of addressing the protection and preservation of natural resources, agriculture, and open space areas; managing mineral resources; preserving and enhancing cultural resources; and providing recreational opportunities for the residents of Riverside County. The Multipurpose Open Space Element also contains figures that detail the locations of water resources, vegetation communities, parks, forests, recreation areas, mineral resources, and cultural resources within the County. Together with the Multiple Species Habitat Conservation Plan (MSHCP), the Multipurpose Open Space Element seeks to preserve and protect identified open space areas in order to maintain or improve environmental quality. (Riverside County, 2021a, p. OS-1)

Safety Element

The Safety Element has the primary objective of reducing death, injuries, property damage, and economic and social impact of potential hazards within the County. The Safety Element serves to develop a framework by which safety considerations are introduced into the land use planning process; facilitate the identification and mitigation of hazards for new development; strengthen existing codes, project review, and permitting processes; present policies directed at identifying and reducing hazards



in existing development; and strengthen earthquake, flood, inundation, and wildland fire preparedness planning and post-disaster reconstruction policies. Within the Safety Element, policies are presented which pertain to seismic, slope and soil instability; flood and inundation; fire safety; hazardous waste and materials; and disaster preparedness, response, and recovery hazards. (Riverside County, 2021a, pp. S-1 and S-2)

Noise Element

The purpose of the Noise Element is to identify sources of noise generation in the County and provide policies to ensure development does not expose people to unacceptable noise levels. The establishment of desirable maximum noise levels and implementation of noise regulations are also included as part of the Noise Element. The Noise Element provides a systematic approach to identifying and managing noise problems in the community; quantifies existing and projected noise levels; addresses excessive noise exposure; and directs community planning for regulation of noise. The Noise Element includes policies, standards, criteria, programs, diagrams, a reference to action items, and maps related to the protection of public health and welfare with respect to noise. (Riverside County, 2021a, p. N-3)

Housing Element

The 2021-2029 Housing Element identifies and establishes County policies intended to fulfill the housing needs of existing and future residents in Riverside County. It establishes policies that guide County decision-making and set forth an action plan to implement its housing goals. The Housing Element includes a review of previous housing goals, an assessment of the effectiveness of those goals, and an assessment of housing needs. Additionally, the Housing Element includes an inventory of resources and constraints related to meeting housing needs in the County; an analysis of affordable housing developments and programs intended to preserve such housing; community goals for the maintenance, preservation, improvement and development of housing; and a program which sets forth a five-year schedule of actions that the County is undertaking or intends to undertake in implementing the policies set forth in the Housing Element. (Riverside County, 2021c, p. H-1)

Air Quality Element

The intent of the Air Quality Element is to provide background information on the physical and regulatory environment affecting air quality in the County. This element also identifies goals, policies, and programs that are meant to balance the County's actions regarding land use, circulation, and other issues potentially affecting air quality. This element works in conjunction with local and regional air quality planning efforts to address ambient air quality standards set forth by the Federal Environmental Protection Agency (EPA) and the California Air Resources Board (CARB). The Air Quality Element sets ambient air quality standards for various air pollutants based on State and federal standards. The Element also contains policies regarding sensitive receptors, mobile and stationary pollution sources, energy efficiency and conservation, jobs and housing, and transportation. (Riverside County, 2021a, pp. AQ-3 through AQ-31)



Healthy Communities Element

The Healthy Communities Element provides a framework for translating the General Plan vision for a healthy Riverside County into reality by identifying policies aimed at achieving that vision. The Element addresses areas where public health and planning intersect, including transportation and active living; access to nutritious foods; access to health care; mental health; quality of life; and environmental health. This Element addresses overall health; land uses and community design; transportation system (with an emphasis on non-motorized transportation); arts and culture; social capital; complete communities; parks, trails, and open space; access to healthy foods and nutrition; healthcare and mental healthcare; schools, recreational centers, and daycare centers; and environmental health. (Riverside County, 2021a, pp. HC-1 through HC-12)

Administration Element

The Administration Element focuses on the administration of the General Plan, which is the sole responsibility of the County of Riverside, under the authority of the Board of Supervisors. Administration of the General Plan policies includes establishing, maintaining, and applying tools and procedures for interpreting the intent of the General Plan and applying the interpretation to a variety of circumstances. This Element details the vision for Riverside County, General Planning Principles, Countywide Elements and Planning Policies/Area Plan, Appendices of the General Plan, and other administrative topics. (Riverside County, 2021a, pp. AQ-1 through AQ-20)

2. *Elsinore Area Plan (EAP)*

As noted above, the Project site is located within the Elsinore Area Plan (EAP) of the Riverside County General Plan. The EAP guides the evolving character of the area, and uses the County of Riverside General Plan vision to establish policies for development and conservation within the specific area of Riverside County. The EAP provides a description of the location, physical characteristic, and special features, in addition to a Land Use Plan, policies, and exhibits to better understand the physical, environmental, and regulatory characteristics that comprise the area. Each section of the EAP addresses critical issues facing the Elsinore community. The EAP includes sections detailing the features, policy areas, land use, circulation, multipurpose open space, and hazards.

As shown on Figure 4 of the EAP, *Elsinore Area Plan and Policy Areas*, the Project site is located within the boundaries of adopted SP 333, but is not located within any other Policy Areas identified in the EAP. In addition, EAP Figure 6, *Elsinore Area Plan Mt. Palomar Night Time Lighting Policy Area*, the Project site is located within Zone B of the Mt. Palomar Night Time Lighting Policy Area, indicating that land uses in the Project area are subject to compliance with Riverside County Ordinance No. 655 (Regulating Light Pollution). Additionally, EAP Figure 9, *Elsinore Area Plan Scenic Highways*, indicates that I-15 and State Route 74 (SR 74) are “State Eligible” scenic highways. (Riverside County, 2021b, Figures 4 and 9)



3. *Riverside County Zoning Ordinance*

The Riverside County Zoning Ordinance is intended to implement the Riverside County General Plan's Land Use Plan. Under existing conditions, the 157.1-acre Project site is zoned for "Specific Plan Zone (SP Zone)," indicating that the property is within the boundaries of SP 333 and is subject to the zoning classifications established by the adopted SP 333. Refer to subsection 4.11.1.C for a more thorough discussion of the site's existing zoning classifications. (RCIT, 2021)

4. *Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)*

Riverside County has adopted a Multiple Species Habitat Conservation Plan (MSHCP), which is a comprehensive, multi-jurisdictional Habitat Conservation Plan (HCP). The MSHCP promotes conservation of species and their associated habitats in Riverside County through implementation of several HCPs that affect lands within the County. The Western Riverside County MSHCP and the Coachella Valley MSHCP are the two dominant plans that impact the largest portions of the county. These plans coordinate multi-jurisdictional habitat-planning and conservation efforts in the region to promote biological and ecological diversity while accommodating the appropriate construction of new development and infrastructure projects. Riverside County catalogs acquisitions and conservation of lands with respect to the HCPs, and periodically updates the General Plan Land Use maps accordingly. (Riverside County, 2015, p. 4.2-27)

As previously shown on EIR Figure 2-6, the entire Project site is located within MSHCP Criteria Cells of the Elsinore Area Plan (EAP). A majority of the Project site is located within EAP Cell Number 3748, which is not located within a Cell Group. The northwestern corner of the Project site is located within EAP Cell Number 3647, which comprises the southern extent of Cell Group E. A small portion of the Project site is located within Cell Number 3648, which comprises the southern extent of Cell Group F. In addition to conservation criteria within areas designated to be included within the MSHCP Reserve System, the MSHCP also identifies a number of additional survey and conservation requirements that apply to the Project area. Refer to EIR Subsection 4.4, *Biological Resources*, for a more thorough discussion of the MSHCP and the Project site's relationship thereto.

5. *Stephen's Kangaroo Rat Habitat Conservation Plan (SKR HCP)*

The Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) was prepared under the direction of the Riverside County Habitat Conservation Agency (RCHCA) Board of Directors, in consultation with United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW). The County of Riverside is a member agency of the RCHCA. The 30-year SKR HCP was designed to acquire and permanently conserve, maintain, and fund the conservation, preservation, restoration, and enhancement of Stephens' kangaroo rat-occupied habitat. The SKR HCP covers approximately 534,000 acres within the member jurisdictions and includes an estimated 30,000 acres of occupied Stephens' kangaroo rat habitat. The SKR HCP requires members to preserve and manage 15,000 acres of occupied habitat in seven Core Reserves encompassing over 41,000 acres. (Riverside County, 2015, p. 4.8-52)



On May 3, 1996, the USFWS issued a permit to the Riverside County Habitat Conservation Agency to incidentally take the federally endangered Stephens' kangaroo rat (*Dipodomys stephensi*). Similarly, the CDFW issued a California Endangered Species Act Management Authorization for Implementation of the Stephens' Kangaroo Rat HCP on May 6, 1996. To date, more than \$50 million has been dedicated to the establishment and management of a system of regional preserves designed to ensure the survival of SKR in the plan area. This effort resulted in the permanent conservation of approximately 50% of the SKR-occupied habitat remaining in the HCP area. Through direct funding and in-kind contributions, SKR habitat in the regional reserve system is managed to ensure its continuing ability to support the species. Core reserves were deemed complete in December of 2003. (Riverside County, 2015, p. 4.8-52)

Although the Project site is not targeted for conservation as part of the SKR HCP, the Project site is located within the SKR HCP fee area, which requires the payment of fees pursuant to Riverside County Ordinance No. 663.

6. Southern California Association of Governments (SCAG)

The Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG develops long-range regional transportation plans including sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations and other plans for the region. (SCAG, n.d.)

As an MPO and public agency, SCAG develops transportation and housing strategies that transcend jurisdictional boundaries that affect the quality of life for southern California as a whole. On September 3, 2020, SCAG's Regional Council adopted *Connected SoCal (2020-2045 Regional Transportations Plan/Sustainable Communities Strategy* (herein, "RTP/SCS"). The RTP/SCS includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. The RTP/SCS also provides objectives for meeting emissions reduction targets set forth by the California Air Resources Board (ARB); these objectives were provided in a direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing and environmental planning. (SCAG, 2020) The RTP/SCS is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods.

The 2020-2045 RTP/SCS includes a Technical Appendix titled "Goods Movement" that is applicable to the Project because the Project entails a use that is closely associated with, and relies directly on the goods movement system (e.g., manufacturing, construction, retail trade, wholesale trade and transportation, and warehousing). In April 2018 SCAG published *Industrial Warehousing in the SCAG Region*. According to the



document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region's freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, state highways and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. The region is home to approximately 34,000 warehouses with 1.17 billion square feet of warehouse building space, and undeveloped land that could accommodate an additional 338 million square feet of new warehouse building space. These regions attract robust logistics activities, and are a major reason the region is a critical mode in the global supply chain. (SCAG, 2018, p. ES-1)

7. *South Coast Air Quality Management District Air Quality Management Plan (SCAQMD AQMP)*

California Health & Safety Code § 40702 et seq., the California Clean Air Act, requires that an Air Quality Management Plan (AQMP) be developed and then updated every three years for air basins with non-attainment status. As discussed in EIR Section 4.3, *Air Quality*, the Project site is located in the South Coast Air Basin (SCAB). The SCAB is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD), the agency charged with bringing air quality in the SCAB into conformity with federal and State air quality standards. Air quality within the SCAB is regulated by the SCAQMD and standards for air quality are documented in the SCAQMD's 2016 AQMP. Although air quality in the SCAB has improved over the past several decades, according to the SCAQMD, the SCAB currently does not meet National Air Quality Standards (NAAQS) attainment status for ozone (O₃) and particulate matter less than 2.5 microns (PM_{2.5}). The SCAB's currently is considered non-attainment under the California Ambient Air Quality Standards (CAAQS) due to levels of ozone (O₃), particulate matter < 2.5 microns (PM_{2.5}), and particulate matter < 10 microns (PM₁₀). (SCAQMD, 2017)

The SCAQMD AQMP is a plan for the regional improvement of air quality. Projects such as the proposed Project relate to the air quality planning process through the growth forecasts that were used as inputs into the regional transportation model. If a proposed project is consistent with these growth forecasts, and if all available emissions reduction strategies are implemented as effectively as possible on a project-specific basis, then the project is consistent with the AQMP.

8. *Riverside County Good Neighbor Guidelines*

The Riverside County Board of Supervisors has adopted a "Good Neighbor" Policy for Logistics and Warehouse/Distribution Uses" (Good Neighbor Policy). The Good Neighbor Policy provides a framework through which large-scale logistics and warehouse projects can be designed and operated in a way that lessens their impact on surrounding communities and the environment. It is meant to apply Best Management Practices to help minimize potential impacts to sensitive receptors and is intended to be used in conjunction with the County's Land Use Ordinance, which provides development requirements for said projects, and CEQA. The Good Neighbor Policy does not replace the need for preparation of the appropriate project-specific environmental review and application of any necessary measures that may arise out of that review. The Good Neighbor Policy provides a series of development and operational criteria that can be implemented to



supplement project-level mitigation measures, in order to further reduce impacts related to logistics and warehousing development and operations. The policies are organized into specific categories, to address these potential quality of life issues from the initial design process, to construction, and through operations.

4.11.2 APPLICABLE ENVIRONMENTAL REGULATIONS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to land use and planning.

A. Federal Regulations

1. Clean Water Act

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. (EPA, n.d.)

2. Federal Aviation Regulations Part 77

Federal Regulation Title 14 Part 77 establishes standards and notification requirements for objects affecting navigable airspace. This notification serves as the basis for: (FAA, 2020a)

- Evaluating the effect of the construction or alteration on operating procedures;
- Determining the potential hazardous effect of the proposed construction on air navigation;
- Identifying mitigating measures to enhance safe air navigation; and
- Charting of new objects.

Notification allows the Federal Aviation Administration (FAA) to identify potential aeronautical hazards in advance to prevent or minimize the adverse impacts to the safe and efficient use of navigable airspace. Any person/organization who intends to sponsor any of the following construction or alterations must notify the Administrator of the FAA: (FAA, 2020a)

- Any construction or alteration exceeding 200 feet above ground level.
- Any construction or alteration:



- within 20,000 feet of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with at least one runway more than 3,200 feet.
- within 10,000 feet of a public use or military airport which exceeds a 50:1 surface from any point on the runway of each airport with its longest runway no more than 3,200 feet.
- within 5,000 feet of a public use heliport which exceeds a 25:1 surface.
- Any highway, railroad, or other traverse way whose prescribed adjusted height would exceed that above noted standards.
- When requested by the FAA.
- Any construction or alteration located on a public use airport or heliport regardless of height or location. (FAA, 2020a)

Persons failing to comply with the provisions of FAR Part 77 are subject to Civil Penalty under Section 902 of the Federal Aviation Act of 1958, as amended and pursuant to 49 U.S.C. Section 46301(a). (FAA, 2020a)

B. State and Regional Regulations

1. Porter-Cologne Water Control Act

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code § 13000 et seq.), the policy of the State is as follows: (SWRCB, 2014)

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation.

The Porter-Cologne Act established nine Regional Water Boards (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and Regional Water Boards have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management. (SWRCB, 2014)

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The



Storm Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions. (SWRCB, 2014)

The Porter-Cologne Act also implements many provisions of the Clean Water Act, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. (SWRCB, 2014)

2. California Water Code

The California Water Code is the principal state law regulating water quality in California. Water quality provisions must be complied with as contained in numerous code sections including: 1) the Health and Safety Code for the protection of ground and surface waters from hazardous waste and other toxic substances; 2) the Fish and Game Code for the prevention of unauthorized diversions of any surface water and discharge of any substance that may be deleterious to fish, plant, animal, or bird life; 3) the Harbors and Navigation Code for the prevention of the unauthorized discharge of waste from vessels into surface waters; and 4) the Food and Agriculture Code for the protection of groundwater which may be used for drinking water supplies. The California Department of Fish and Wildlife (CDFW), through provisions of the Fish & Game Code (§§ 1601 - 1603) is empowered to issue agreements for any alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by CDFW. (CA Legislative Info, n.d.)

Surface water quality is the responsibility of the Regional Water Quality Control Board (RWQCB), water supply and wastewater treatment agencies, and city and county governments. The principal means of enforcement by the RWQCB is through the development, adoption, and issuance of water discharge permits. RWQCB basin plans establish water quality objectives that are defined as the limits or levels of water quality constituents or characteristics for the reasonable protection of beneficial uses of water. (CA Legislative Info, n.d.)

3. California Planning and Zoning Law

The legal framework in which California cities and counties exercise local planning and land use functions is set forth in the California Planning and Zoning Law, §§ 65000 - 66499.58. Under State of California planning law, each city and county must adopt a comprehensive, long-term general plan. State law gives cities and counties wide latitude in how a jurisdiction may create a general plan, but there are fundamental requirements that must be met. These requirements include the inclusion of seven mandatory elements described in the Government Code, including a section on land use. Each of the elements must contain text and descriptions



setting forth objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and mitigation measures. (OPR, n.d.)

4. Subdivision Map Act

The Subdivision Map Act (“Map Act”) vests in the cities and counties the power to regulate and control the design and improvement of subdivisions within its boundaries. Each city must adopt an ordinance regulating and controlling subdivisions for which the Map Act requires a tentative and final or parcel map. The authority for a city or county to regulate land use, including subdivisions, flows from the general police power. However, the Map Act sets forth certain mandates that must be followed for subdivision processing. A city can impose conditions on the subdivision process when the Map Act is silent, but it cannot regulate contrary to specific provisions contained in the Map Act. (Curtin, Jr. & Merritt, 2002, p. 1) The Map Act's primary goals are:

- To encourage orderly community development by providing for the regulation and control of the design and improvement of the subdivision, with a proper consideration of its relation to adjoining areas;
- To ensure that the areas within the subdivision that are dedicated for public purposes will be properly improved by the subdivider so that they will not become an undue burden on the community; and
- To protect the public and individual transferees from fraud and exploitation. (Curtin, Jr. & Merritt, 2002, p. 1)

The Map Act is applied in conjunction with other state land use laws such as the general plan, specific plans, zoning, CEQA, and the Permit Streamlining Act. The Map Act provides for regulation of land divisions by a city or county and is interpreted and enforced by the city or county. (Curtin, Jr. & Merritt, 2002, p. 2)

5. Office of Planning and Research (OPR) General Plan Guidelines

Each city and county in California must prepare a comprehensive, long term general plan to guide its future. To assist local governments in meeting this responsibility, the Governor’s Office of Planning and Research (OPR) is required to adopt and periodically revise guidelines for the preparation and content of local general plans pursuant to Government Code § 65040.2. The General Plan Guidelines is advisory, not mandatory. Nevertheless, it is the state’s only official document explaining California’s legal requirements for general plans. Planners, decision-making bodies, and the public depend upon the General Plan Guidelines for help when preparing local general plans. The courts have periodically referred to the General Plan Guidelines for assistance in determining compliance with planning law. For this reason, the General Plan Guidelines closely adheres to statute and case law. It also relies upon commonly accepted principles of contemporary planning practice. (OPR, 2017b, p. 1)

6. State Aeronautics Act

The State Aeronautics Commission Act of 1947 created the Division of Aeronautics (“Division”), and was later amended by statute to read the State Aeronautics Act (Aeronautics Act) in 1961. As a result of this legislation, the Division’s first priorities are those mandated by the Aeronautics Act, then Caltrans guidance,



then Division guidance as expressed through its Policy Element. As directed by the Aeronautics Act, the Division is a steward and advocate of aviation in California. To that end, its efforts are focused on activities that “protect the public interest in aeronautics and aeronautical progress.” (§ 21002) (CA Legislative Info, n.d.)

The Aeronautics Act itself is divided into six chapters, the first five of which have not received significant cleanup legislation since its enabling in 1947. The first chapter begins with general provisions and definitions and explains the Legislature’s intent for a State aviation program. Chapter two explains Caltrans’ role in administering the Division, and explains the role of the California Transportation Commission (CTC). Chapter three includes many of the safety considerations from Federal Aviation Administration (FAA) regulations that help keep airports and the surrounding communities safe and compatible with flight operations. Chapter four deals with airport and heliport permitting, air navigation facilities, noise guidelines, funding, and importantly, the formation and authority of Airport Land Use Commissions (ALUC). Chapter five covers the investigations and hearings on matters covered in the Aeronautics Act. Finally, Chapter six introduces airport planning and specifically introduces the intent of the CASP and how it can be used to support California aviation. (CA Legislative Info, n.d.)

7. SCAG Connect SoCal

The Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG develops long-range regional transportation plans including sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations and other plans for the region. (SCAG, 2020)

Connect SoCal, is SCAG’s 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). *Connect SoCal* includes a Technical Appendix titled “Goods Movement” that is applicable to the Project because the Project entails a use that is closely associated with, and relies directly on the goods movement system (e.g., manufacturing, construction, retail trade, wholesale trade and transportation, and warehousing). In April 2018 SCAG published *Industrial Warehousing in the SCAG Region*. According to the document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region’s freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, state highways and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. The region is home to approximately 34,000 warehouses with 1.17 billion square feet of warehouse building space, and undeveloped land that could accommodate an additional 338 million square feet of new warehouse building space. These regions attract robust logistics activities, and are a major reason the region is a critical mode in the global supply chain. (SCAG, 2018, p. ES-1)



8. Senate Bill 330 – Housing Crisis Act of 2019

To accelerate housing production, Senate Bill 330 (SB 330) makes changes to land use and zoning law to remove barriers and impediments to building new housing in urban areas of the state. To increase transparency and certainty in the development application process, SB 330 allows a housing developer to submit a “preliminary application” to a local agency for a housing development project. Submittal of a pre-application allows a developer to provide a specific subset of information on the proposed housing development ahead of providing the full amount of information required by the local government for a housing development application. Upon submittal of an application and a payment of the permit processing fee, a housing developer is allowed to “freeze” the applicable fees and development standards that apply to their project while they assemble the rest of the material necessary for a full application submittal. SB 330 requires the California Department of Housing and Community Development (HCD) to develop a standardized form that applicants for housing development projects may use for the purpose of satisfying the requirements for submittal of a preliminary application if a local agency has not developed its own application form. HCD has also provide a template that local governments may use to develop their own preliminary application form. (HCD, n.d.)

SB 330 also requires the California Department of Housing and Community Development (HCD) to develop a list of cities (“affected cities”) and census designated places (CDPs) within the unincorporated county (“affected counties”) that are prohibited from taking certain zoning-related actions, including, among other things: 1) Downzoning certain parcels; 2) Imposing a moratorium on development; and 3) Imposing design review standards that are not objective. The law also requires jurisdiction-wide housing replacement when housing affordable to lower-income residents is demolished. It is important to note that SB 330 does not prohibit an affected county or an affected city from changing a land use designation or zoning ordinance to a less intensive use, provided that the city or county concurrently changes the development standards, policies, and conditions applicable to other parcels within the jurisdiction to ensure that there is no net loss in residential capacity. (HCD, n.d.)

Although the Project would involve a General Plan Amendment and Change of Zone to change the site’s existing land use designation and zoning classifications to allow for light industrial development instead of medium density residential housing, the provisions of SB 330 that prohibit downzoning of residential property for non-residential use apply only to “affected counties,” which are defined by SB 330 as “a census designated place, based on the 2013-2017 American Community Survey 5-year Estimates, that is wholly located within the boundaries of an urbanized area, as designated by the United States Census Bureau.” HCD has published a list of 141 CDPs in 22 counties that are identified as “affected counties.” The Project site and surrounding areas are not included on the list of “affected counties” pursuant to SB 330. As such, the Project’s proposal to allow for development of the Project site with light industrial and business park uses in lieu of medium density residential uses is not subject to the provisions of SB 330 that would require a concurrent change of zone on other off-site properties. (HCD, n.d.)



4.11.3 BASIS FOR DETERMINING SIGNIFICANCE

Section XI of Appendix G to the State CEQA Guidelines, as updated in December 2018, addresses typical adverse effects on land use and planning, and includes the following threshold questions to evaluate the Project’s impacts on land use and planning (OPR, 2018a):

- Would the project physically divide an established community?
- Would the project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Significance thresholds are set forth in Riverside County’s Environmental Assessment Checklist, and have been updated to reflect the 2018 updates to Section XI of Appendix G to the State CEQA Guidelines (listed above). Accordingly, the proposed Project would have a significant impact on land use and planning if construction and/or operation of the Project would:

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

The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist, as modified/updated per the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project’s impacts on land use and planning. It should be noted that the Project’s consistency with the Western Riverside County MSHCP and the SKR HCP, which are the only habitat conservation plans or natural community conservation plans applicable to the Project site, is evaluated in EIR Subsection 4.4, *Biological Resources*, under the analysis of Threshold a., and the analysis concludes that impacts due to a conflict with the MSHCP and SKR HCP would be less than significant with mitigation. Project consistency with the MSHCP and SKR HCP is not further discussed in this Subsection.

4.11.4 IMPACT ANALYSIS

Threshold a.: Would the Project 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?

The proposed Project has the potential to conflict with the Riverside County General Plan and EAP, as well as the SCAG RTP/SCS. Future light industrial and business park development within the Project site would be subject to compliance with the County’s Good Neighbor Policy; thus, the Project has no potential to result in a conflict with the Good Neighbor Policy, and further analysis of Project compliance is not necessary. Additionally, the Project’s consistency with the SCAQMD AQMP is addressed under EIR Subsection 4.3, *Air Quality*. Similarly, the Project’s consistency with the Western Riverside County Multiple Species Habitat



Conservation Plan (MSHCP) and the Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) are addressed in EIR Subsection 4.4, *Biological Resources*. In addition, the Project's consistency with Riverside County's Climate Action Plan (CAP) is addressed in EIR Subsection 4.8, *Greenhouse Gas Emissions*. As discussed in Subsection 4.3, the Project would result in significant and unavoidable impacts due to a conflict with the 2016 SCAQMD AQMP, which would result from the Project's long-term operational emissions of ROG_s and NO_x and because the Project's proposed land uses are not consistent with the growth forecasts included in the 2016 SCAQMD AQMP. As indicated in EIR Subsections 4.4 and 4.8, the Project would not conflict with the MSHCP, the SKR HCP, or the Riverside County CAP; thus, impacts due to a conflict with the MSHCP, SKR HCP, and CAP would be less than significant. The Project's consistency with the SCAQMD AQMP, MSHCP, SKR HCP, and the County's CAP is not further discussed below.

A. Project Consistency with General Plan and EAP

1. General Plan and EAP Land Use Consistency

Under existing conditions, the 157.1-acre Project site is located within the boundaries of the Renaissance Ranch Specific Plan (SP 333). The General Plan and EAP designate the property for "Medium Density Residential (MDR)" land uses. The Project Applicant proposes a General Plan Amendment (GPA 200004) and the first amendment to Specific Plan No. 333 (SP 333A1) to change the site's land use designations to instead include "Light Industrial (LI)," "Business Park (BP)," "Open Space – Conservation (OS-C)," and "Open Space – Conservation Habitat" land uses. With approval of GPA 200004 and SP 333A1, the Project would be fully consistent with the General Plan and EAP land use designations for the 157.1-acre property. Moreover, impacts associated with the proposed land uses have been evaluated throughout this EIR. Where significant impacts are identified, mitigation measures are identified to reduce impacts to the maximum feasible extent. Based on the foregoing analysis, the proposed Project would not result in a significant environmental impact due to a conflict with any land use plan adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

2. General Plan and EAP Policy Consistency

A General Plan Policies Consistency Analysis was prepared for the proposed Project in order to demonstrate the Project's consistency with applicable General Plan policies, and is included as *Technical Appendix I*. For more information regarding the Project's consistency with specific applicable Riverside County General Plan and EAP policies, please refer to *Technical Appendix I*. As concluded therein, the Project would not conflict with any of the applicable General Plan and EAP policies adopted for the purpose of avoiding or reducing significant environmental effects. Accordingly, impacts due to a conflict with applicable General Plan or EAP policies would be less than significant.

B. Project Consistency with SCAG's 2020-2045 RTP/SCS

As previously noted, on September 3, 2020, SCAG adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also referred to as "Connect SoCal." The RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with



goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in the RTP/SCS are pertinent to the proposed Project. These goals are meant to provide guidance for considering the proposed Project within the context of regional goals and policies. An analysis of the Project’s consistency with the relevant goals of the RTP/SCS is presented below in Table 4.11-1, *Analysis of Consistency with SCAG Draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Goals*. As indicated the Project would not conflict with any of the RTP/SCS goals, and no impact would occur.

Table 4.11-1 Analysis of Consistency with SCAG Draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Goals

DRAFT RTP/SCS GOAL	GOAL STATEMENT	PROJECT CONSISTENCY DISCUSSION
1.	Encourage regional economic prosperity and global competitiveness.	<u>Consistent.</u> This policy would be implemented by cities and the counties within the SCAG region as part of comprehensive local and regional planning efforts. The Project would support this goal by providing employment-generating land uses (i.e., light industrial and business park) in a portion of the County that has a low jobs-to-housing ratio.
2.	Improve mobility, accessibility, reliability, and travel safety for people and goods.	<u>Consistent.</u> EIR Section 4.18, <i>Transportation</i> , evaluates Project-related transportation impacts and specifies improvements, fee payments, and fair-share contributions to address the Project’s effects on Level of Service (LOS) at all study area facilities. The Project Applicant would implement or contribute to local transportation improvements that would improve mobility, accessibility, reliability, and travel safety for people and goods in the local area.
3.	Enhance the preservation, security, and resilience of the regional transportation system.	<u>Consistent.</u> This policy would be implemented by cities and the counties within the SCAG region as part of comprehensive local and regional planning efforts. As disclosed in EIR Section 4.18, <i>Transportation</i> , there are no components of the proposed Project that would adversely affect the preservation, security, or resilience of the regional transportation system, and the Project Applicant would contribute fees towards regional improvements required in the Project vicinity. Furthermore, SP 333A1 requires roadway and intersection improvements consistent with the County General Plan Circulation Element, EAP, and the Riverside County Road Standards (Ordinance No. 461).



Table 4.11-1 Analysis of Consistency with SCAG Draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Goals

DRAFT RTP/SCS GOAL	GOAL STATEMENT	PROJECT CONSISTENCY DISCUSSION
4.	Increase person and goods movement and travel choices within the transportation system.	<u>Consistent.</u> This policy would be implemented by cities and the counties within the SCAG region as part of the overall planning and maintenance of the regional transportation system. The Project would expand facilities for goods movement in the local area, and would construct or contribute fees towards regional transportation improvements. Additionally, the intensity of the proposed Project would facilitate expanded transit service in the local area.
5.	Reduce greenhouse gas emissions and improve air quality.	<u>Consistent.</u> This policy would be implemented by cities and the counties within the SCAG region as part of comprehensive transportation planning efforts. The Project would entail development of light industrial, business park, and commercial retail uses in a portion of Riverside County that experiences a relatively low jobs-to-housing ratio; thus, the Project would serve to reduce worker commute times in the local area by providing jobs in close proximity to housing. Additionally, and as discussed in EIR Subsections 4.3, <i>Air Quality</i> , and 4.8, <i>Greenhouse Gas Emissions</i> , the Project would be required to implement mitigation measures to reduce air quality emissions to the maximum feasible extent.
6.	Support healthy and equitable communities.	<u>Consistent.</u> An analysis of the Project’s environmental impacts is provided throughout this EIR, and mitigation measures are specified where warranted. Air quality is addressed in EIR Subsection 4.3, <i>Air Quality</i> , and mitigation measures are specified to reduce the Project’s air quality impacts to the extent feasible. The Project study area is within the service area of the Riverside Transit Authority (RTA), a public transit agency serving various jurisdictions within Riverside County. The Project would not conflict with any existing or planned RTA routes. Additionally, and as discussed in detail in EIR <i>Technical Appendix I</i> , the Project would be consistent with or otherwise would not conflict with any applicable General Plan policies or requirements, including policies and requirements included in the General Plan’s Healthy Communities Element. Thus, the Project would facilitate the establishment of healthy and equitable communities.
7.	Adapt to a changing climate and support an integrated regional development pattern and transportation network.	<u>Consistent.</u> This policy would be implemented by cities and the counties within the SCAG region as part of comprehensive transportation planning efforts. As indicated in EIR Subsection 4.8, <i>Greenhouse Gas Emissions</i> , the Project would be



Table 4.11-1 Analysis of Consistency with SCAG Draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Goals

DRAFT RTP/SCS GOAL	GOAL STATEMENT	PROJECT CONSISTENCY DISCUSSION
		conditioned to ensure full compliance with the Riverside County Climate Action Plan (CAP), thereby demonstrating that the Project would assist the County in meeting its greenhouse gas (GHG) reduction targets. The Project also would be conditioned to construct and/or contribute fees towards improving the regional transportation network.
8.	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	<u>Not Applicable.</u> This policy provides guidance to the County to leverage new transportation technologies and data-driven solutions that result in more efficient travel. There are no components of the proposed Project that would preclude the County’s ability to implement this goal.
9.	Encourage development of diverse housing types in areas that are supported by multiple transportation options	<u>Not Applicable.</u> This policy would be implemented by cities and the counties within the SCAG region as part of comprehensive transportation planning efforts. The Project does not include any residential uses, and therefore has no potential to conflict with this goal.
10.	Promote conservation of natural and agricultural lands and restoration of habitats	<u>No conflict identified.</u> As part of the Project, a total of 38.6 acres of the Project site would be conserved as natural open space. As indicated in EIR Subsection 4.4, <i>Biological Resources</i> , the only sensitive vegetation community that occurs on site under existing conditions is southern cottonwood willow riparian forest. The Project would result in impacts to 3.31 acres of southern cottonwood willow riparian forest; however, compensatory mitigation for impacts to 3.31 acres of southern cottonwood willow riparian forest already has occurred through credits purchased from the Riverside-Corona Resource Conservation District at their Lee Lake Preserve, consisting of 13.92 acres of habitat creation and conservation, and through 9.28 acres of habitat restoration and <i>Arundo donax</i> removal within Bedford Canyon Wash. Additionally, the Project site is designated by the Riverside County General Plan for future development with urban land uses, and therefore the Project site is not suitable for conservation as agricultural land.

(SCAG, 2020)

C. Land Use Compatibility

The Project as evaluated herein would provide for the future development of the 157.1-acre Project site with a mixture of light industrial and business park land uses. Under existing conditions, areas to the west and south of the Project site are developed with medium density residential uses, lands to the south of the Project site



include medium-density residential uses and an elementary school (Luiseño Elementary School). To the west of the Project site are medium-density residential uses, a recreational facility (Horsethief Canyon Park), and the Horsethief Canyon Wastewater Treatment Plant, with undeveloped lands occurring west of the northwestern Project boundary. To the north of the Project site are several rural residences, a small area of open space and I-15, beyond which are several light industrial/business park uses and open space. To the east of the Project site are several rural residential dwelling units, open space, and an existing construction storage yard. The Riverside County General Plan and EAP designate lands to the west and south of the Project site for MDR land uses, with lands to the west of the northwestern portion of the Project site designated for MHDR and OS-R land uses. Lands to the north of the Project site and south of I-15 are designated for CR land uses, with areas north of and abutting the I-15 designated for LI and OS-CH land uses. Lands to the east of the Project site are designated for RR and OS-W land uses, with a small area designated for LI land uses. Areas to the southeast of the Project site are located within the City of Lake Elsinore and are designated by the Lake Elsinore General Plan for “Low Density Residential” uses. As such, the Project has the potential to result in significant environmental impacts due to the proximity of the Project’s proposed light industrial and business park uses to existing and planned residential and school uses.

Impacts associated with the Project’s potential land use compatibility with surrounding uses have been evaluated throughout this EIR under the appropriate subject headings. For example, EIR Subsection 4.3, *Air Quality*, includes an assessment of potential localized air quality impacts that could result from Project implementation, including cancer and non-cancer risks associated with diesel-powered truck trips that would be generated by the Project. As concluded in EIR Subsection 4.3, the Project’s localized air quality impacts affecting surrounding sensitive receptors, including residential and school uses, would be less than significant. EIR Subsection 4.9, *Hazards and Hazardous Materials*, includes an analysis of potential hazardous materials impacts that could affect surrounding land uses, and demonstrates that with mandatory regulatory compliance and implementation of mitigation measures, impacts associated with hazards and hazardous materials would be reduced to less-than-significant levels. EIR Subsection 4.13, *Noise*, includes an assessment of potential noise impacts associated with the Project, including noise from construction, site operations, and Project-related traffic, and concludes that with mitigation, Project impacts would be less than significant. There are no environmental effects to surrounding existing or planned land uses that have not already been evaluated throughout this Program EIR, and where necessary mitigation measures have been imposed on the Project to reduce potential impacts to the extent feasible.

Furthermore, the Project would be subject to compliance with the County’s “Good Neighbor” Policy for Logistics and Warehouse/Distribution Uses (Good Neighbor Policy). The Good Neighbor Policy includes a number of requirements intended to reduce impacts associated with logistics and warehouse/distribution uses on surrounding land uses, particularly residential land uses. The Good Neighbor Policy applies to any logistics and warehouse project that include any building larger than 250,000 square feet (s.f.) in size. Although the precise configuration and size of proposed buildings would be determined in the future as part of future implementing discretionary actions (e.g., tentative parcel maps, plot plans, conditional use permits, etc.), it is expected that a majority of buildings to be constructed on site would exceed 250,000 s.f. in size and thus would be subject to the Good Neighbor Policy requirements. These requirements include, but are not limited to, the following:



- An air quality study, health risk assessment, noise impact analysis, and construction traffic control plan shall be prepared;
- During construction, all heavy-duty haul trucks accessing the site shall have CARB-approved 2010 engines or newer approved CARB engine standards;
- During construction, all excavators, graders, rubber-tired dozers, and similar “off-road” construction equipment shall be CARB Tier 3 Certified engines or better;
- During construction, the maximum daily disturbance area (actively graded area) shall not exceed 10 acres per day;
- During construction, the Transportation & Land Management Agency representative shall conduct an on-site inspection with a facility representative to verify compliance with these policies, and to identify other opportunities to reduce construction impacts;
- Warehouse/distribution facilities should be generally designed so that truck bays and loading docks are a minimum of 300 feet away from the property line of sensitive receptors, measured from the dock building door (this distance may be reduced the site design include berms or other similar features to appropriately shield and buffer the sensitive receptors);
- Warehouse/distribution facilities shall be designed to provide adequate on-site parking for commercial trucks and passenger vehicles and on-site queuing for trucks that is away from sensitive receptors;
- Driveways shall be placed, to the maximum extent practicable, on streets that do not have fronting sensitive receptors adjacent to the Project site;
- Sites shall be densely screened with landscaping along all bordering streets and adjacent sensitive receptors, with trees spaced at no less than 50 feet on center;
- Dock doors shall be located where they are not readily visible from sensitive receptors or major roads, or must be screened from public view through a combination of landscaping, berms, walls, or other similar features;
- To the extent possible, establish separate entry and exit points within a warehouse/distribution facility for trucks and vehicles to minimize vehicle/truck conflicts;
- Facility operators shall maintain records of their fleet equipment and ensure that all diesel-fueled Medium-Heavy Duty Trucks (“MHDT”) and Heavy-Heavy Duty Trucks (“HHD”) accessing the site use year CARB 2010 or newer engines;
- Facility operators shall train their managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks;
- Facility operators shall establish specific truck routes between the facility and regular destinations, identifying the most direct routes to the nearest highway/freeway and avoid traveling through local residential communities;
- Facility operators shall require their drivers to park and perform any maintenance of trucks in designated on-site areas and not within the surrounding community or on public streets;
- If a public address (PA) system is being used in conjunction with a warehouse/distribution facility operation, the PA system shall be oriented away from sensitive receptors and the volume set at a level not readily audible past the property line;
- Facility Operation shall comply with the exterior noise decibel levels as required by Ord. 847 (Noise Ordinance), which includes a maximum exterior decibel level of 55 dba (between 7:00 a.m. and 10:00



p.m.) and 45 dba (between 10:00 p.m. and 7:00 a.m.) as measured on adjacent occupied residences, or as modified by the most current version of Ordinance No. 847; and

- The applicant for any new facility may be required to provide a supplemental funding contribution, which would be applied to further off-set potential air quality impacts to the community and provide a community benefit above and beyond any CEQA related mitigation measures.

With mandatory compliance with the County’s Good Neighbor Guidelines, in addition to implementation of the measures described above to address other environmental issues (e.g., air quality, etc.), the Project’s potential impacts due to land use compatibility would remain less than significant.

Threshold b.: Would the Project disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?

Under existing conditions, the Project site is undeveloped and contains no public thoroughfares, aside from Horsethief Canyon Road, which is fully improved along the site’s western boundary. Additionally, while the Project site include informal trails, these trails occur on private property and are not publicly-accessible. An existing residential community occurs to the west and south of the Project site, with some rural residential development occurring to the east of the Project site. However, the Project site abuts I-15 to the north, and is not situated between any established communities; thus, the Project has no potential to disrupt or divide the physical arrangement of the existing residential community located to the west and south of the Project site. Future development on site would include public roadways and trails, which would improve local access in the area and provide linkages to existing roads and infrastructure. As such, the Project would not disrupt or divide the physical arrangement of an established community, and impacts would be less than significant.

4.11.5 CUMULATIVE IMPACT ANALYSIS

As indicated under the analysis of Threshold a., with approval of the Project’s GPA, the proposed Project would not conflict with any of the policies included in the General Plan or EAP, and would not conflict with the SCAG 2020-2045 RTP/SCS. Other developments within the western Riverside County region similarly would be required to demonstrate compliance with applicable General Plan and RTP/SCS policies. Thus, the Project’s impacts due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less-than-cumulatively considerable.

As indicated under the analysis of Threshold b., the Project would not disrupt or divide the physical arrangement of an established community (including a low-income or minority community). As such, cumulatively-considerable impacts would not occur.

4.11.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Less-than-Significant Impact. The Project would not conflict with the General Plan, EAP, the SCAG 2020-2045 RTP/SCS, or any other land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Additionally, there are no impacts due to land use



incompatibility that have not already been evaluated and mitigated to the maximum feasible extent in relevant sections of this EIR; therefore, Project impacts due to land use incompatibility would be less than significant.

Threshold b.: Less-than-Significant Impact. The Project would not disrupt or divide the physical arrangement of an established community (including a low-income or minority community), and impacts would be less than significant.

4.11.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Impacts to land use and planning would be less than significant; therefore, mitigation measures are not required.



4.12 MINERAL RESOURCES

This Subsection describes the potential mineral resources that are located on the Project site and in the vicinity and evaluates the potential effects that the Project may have on these resources. The following analysis is based in part on information obtained in the County's General Plan (Riverside County, 2021a). The analysis in this Subsection also is based on information from the report titled, "Geotechnical Update Report, Proposed Industrial Park Development, Renaissance Ranch Project, Horsethief Canyon Area of Riverside County, California," prepared by Petra Geosciences (herein, "Petra"), dated July 30, 2020, and included as EIR *Technical Appendix F1* (Petra, 2020). In addition, this Subsection relies in part on a report entitled, "Phase I Environmental Site Assessment, Renaissance Ranch located north of Bucking Bay/Palomino Creek Corona, California 92883" (herein, "Phase I ESA"), prepared by Hillmann Consulting (herein, "Hillmann"), dated August 21, 2019, and is included as EIR *Technical Appendix G* (Hillmann, 2019).

4.12.1 EXISTING CONDITIONS

A. Geology

The Project site is situated in the northern portion of the Peninsular Range Province of Southern California. In general, the Peninsular Ranges are underlain primarily of plutonic rock of the Southern California Batholith. These rocks formed from the cooling of molten magma deep within the earth's crust. Intense heat associated with the plutonic magma metamorphosed the ancient sedimentary rocks into which the plutons intruded. (Petra, 2020, p. 5)

Specifically, the Project site is located in the western portion of the Perris Peneplain, which is a broad valley bounded on three sides by mountain ranges: the San Jacinto Mountains on the east, the San Bernardino Mountains on the north, and the Santa Ana Mountains to the west. The northwestern extent of the Perris Peneplain is the Santa Ana River. The Peneplain is a large depositional basin composed primarily of materials eroded from the granitic bedrock surfaces of the Southern California Batholith. Granitic and/or metasedimentary bedrock related to the Santa Ana Mountains are located just to the south of the Project site. (Petra, 2020, pp. 5-6)

B. Mineral Resources Potential

The Surface Mining and Reclamation Act of 1975 (SMARA, Public Resources Code, §§ 2710-2796) provides a comprehensive surface mining and reclamation policy with the regulation of surface mining operations to assure that adverse environmental impacts are minimized and mined lands are reclaimed to a usable condition. The SMARA requires the State Geologist to classify land according to the presence, absence, or likely occurrence of significant mineral deposits in certain areas of the State subject to urban expansion or land uses incompatible with mining. The State classification system is broken out into four general zones, as shown below in Table 4.12-1, *Mineral Resources Zones*. According to mapping information available from the California Department of Conservation (CDC), the Project site is classified as MRZ-3, which indicates that the Project site occurs in an area of undetermined mineral resource significance (CDC, 2014). Accordingly, the Project site does not contain any areas of known mineral resources.



Table 4.12-1 Mineral Resources Zones

Zone	Significance
MRZ-1	Areas where the available geologic information indicates no significant mineral deposits or a minimal likelihood of significant mineral deposits.
MRZ-2a	Areas where the available geologic information indicates that there are significant mineral deposits.
MRZ-2b	Areas where the available geologic information indicates that there is a likelihood of significant mineral deposits.
MRZ-3a	Areas where the available geologic information indicates that mineral deposits are likely to exist, however, the significance of the deposit is undetermined.
MRZ-4	Areas where there is not enough information available to determine the presence or absence of mineral deposits.

(Riverside County, 2021a, pp. OS-37 to OS-38)

4.12.2 APPLICABLE ENVIRONMENTAL REGULATIONS

The following is a brief description of the federal, state, and local environmental laws and related regulations related to mineral resources.

A. State Regulations

1. Surface Mining and Reclamation Act of 1975

The Surface Mining and Reclamation Act of 1975 (SMARA, Public Resources Code, §§ 2710-2796) provides a comprehensive surface mining and reclamation policy with the regulation of surface mining operations to assure that adverse environmental impacts are minimized and mined lands are reclaimed to a usable condition. SMARA also encourages the production, conservation, and protection of the state’s mineral resources. Public Resources Code § 2207 provides annual reporting requirements for all mines in the state, under which the State Mining and Geology Board is also granted authority and obligations. (CDC, n.d.)

SMARA, Chapter 9, Division 2 of the Public Resources Code, requires the State Mining and Geology Board to adopt State policy for the reclamation of mined lands and the conservation of mineral resources. These policies are prepared in accordance with the Administrative Procedures Act, (Government Code) and are found in California Code of Regulations, Title 14, Division 2, Chapter 8, Subchapter 1. (CDC, n.d.)

4.12.3 BASIS FOR DETERMINING SIGNIFICANCE

Section XII of Appendix G to the State CEQA Guidelines addresses typical adverse effects to mineral resources, and includes the following threshold questions to evaluate the Project’s impacts on mineral resources (OPR, 2018a):

- *Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*



- *Would the Project 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.*

Significance thresholds as implemented by Riverside County are set forth in Riverside County’s Environmental Assessment Checklist form, which are derived from Section XII of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact on mineral resources if construction and/or operation of the Project would:

- 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;*
- 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;*
- Be an incompatible land use located adjacent to a State classified or designated area or existing surface mine; or*
- Expose people or property to hazards from proposed, existing or abandoned quarries or mines.*

The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist were used to evaluate the significance of the proposed Project’s impacts on mineral resources.

4.12.4 IMPACT ANALYSIS

Threshold 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?

According to the CDC, the Project site is classified as Mineral Resources Zone (MRZ) 3, which includes “areas where the available geologic information indicates that mineral deposits are likely to exist, however, the significance of the deposit is undetermined” (CDC, 2014). Therefore, the Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, with implementation of the proposed Project there would be no impact to known mineral resources.

Threshold 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?

The Project site is not designated as a mineral resource recovery site by the County’s General Plan, Elsinore Area Plan (EAP), or the adopted SP 333, and there are no other land use plans that identify the site for containing mineral resources. Accordingly, the Project would not 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, and no impact would occur.



Threshold c: Be an incompatible land use located adjacent to a State classified or designated area or existing surface mine?

As mapped by the CDC, there are no areas surrounding the Project site that contain known mineral resources. No lands in the Project vicinity are classified or designated by the State as containing mineral resource deposits, and there are no known surface mines in the Project vicinity. The nearest lands designated as MRZ-2 are located approximately 1.6 miles southeast of the Project site within the City of Lake Elsinore. (CDC, 2014) Accordingly, the Project would not be an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and no impact would occur.

Threshold d: Expose people or property to hazards from proposed, existing, or abandoned quarries or mines?

Historical records indicate that no quarrying or mining activities ever occurred on the Project site, and there is no evidence of any proposed, existing, or abandoned quarries in the surrounding area (Hillmann, 2019, pp. 15-19). Accordingly, the Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines, and no impact would occur.

4.12.5 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects within the western Riverside County region. This cumulative study area was selected because western Riverside County encompasses large areas that include geologic conditions similar to those that occur on the Project site, and because this study area encompasses a large portion of the local market for the production and consumption of mineral resources.

As mapped by the CDC, the Project site is classified as MRZ-3 and contains no known mineral resource deposits. As such, the Project has no potential to result in cumulatively-considerable impacts due to the loss of availability of a known mineral resource that would be of value to the region or residents of the State. No cumulatively-considerable impacts would occur.

Riverside County's General Plan, EAP, and the adopted SP 333 do not designate the Project site or surrounding areas as a mineral resource recovery site, and there are no other land use plans that identify the site or surrounding areas for containing mineral resources. As such, the Project has no potential to result in cumulatively-considerable impacts due to 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. No cumulatively-considerable impacts would occur.

There are no lands in the Project vicinity that include State classified or designated areas for mineral resources, and there are no existing surface mines in the Project vicinity. As such, no cumulatively-considerable impacts to State classified or designated areas or existing surface mines would occur.



There are no known proposed, existing, or abandoned quarries or mines in the Project vicinity. As such, the Project has no potential to expose people or property to hazards from proposed, existing, or abandoned quarries or mines, and no cumulatively-considerable impacts would occur.

4.12.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: No Impact. The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, with implementation of the proposed Project there would be no impact to known mineral resources.

Threshold b.: No Impact. The Project would not 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, and no impact would occur.

Threshold c.: No Impact. The Project would not be an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and no impact would occur.

Threshold d.: No Impact. The Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines, and no impact would occur.

4.12.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

No impact to mineral resources would occur with implementation of the proposed Project; thus, mitigation measures are not required.



4.13 NOISE

This Subsection addresses the environmental issue of noise. The information in this Subsection is based in part on a technical report prepared by ECORP Consulting, Inc. (“ECORP”), titled, “Noise Impact Assessment – Renaissance Ranch Project” (herein, “NIA”), dated March 2021, and included as *Technical Appendix J1* to this EIR (ECORP, 2021b). In addition, in order to address the potential that the Project’s southern access at Bolo Court may be restricted to emergency access only, ECORP also prepared a supplemental focused analysis entitled, “Renaissance Ranch Focused Traffic Route – Noise Technical Memorandum” (herein, “Focused NIA”), dated May 2022, and included as EIR *Technical Appendix J2* (ECORP, 2022) Refer to Section 7.0, *References*, for a complete list of reference sources.

4.13.1 EXISTING CONDITIONS

A. Fundamentals of Noise and Environmental Sound

1. *Decibels*

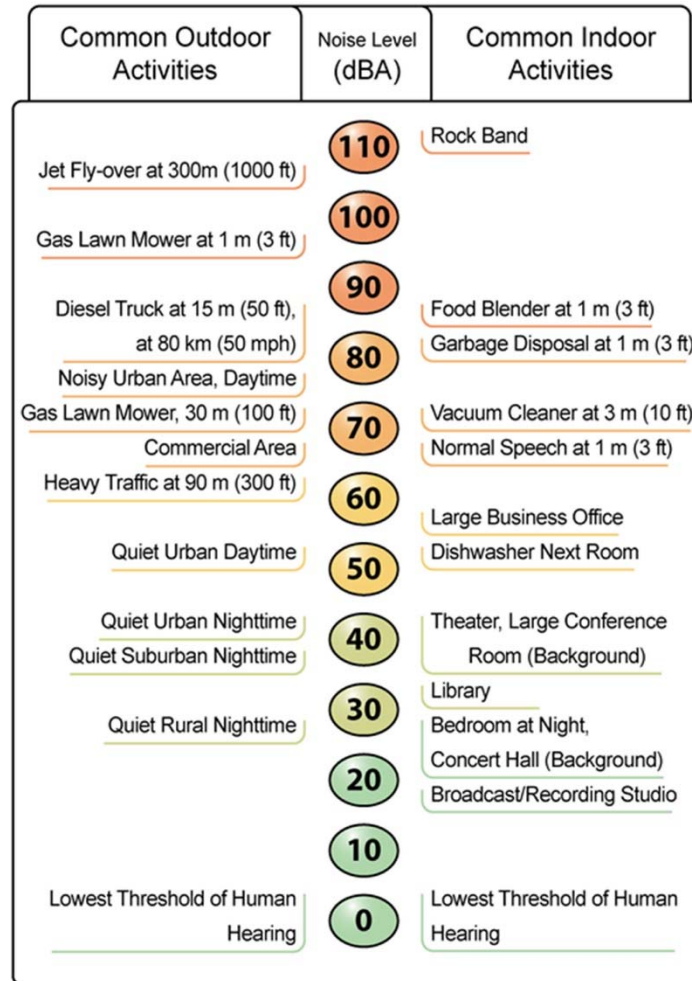
The decibel (dB) scale is logarithmic, not linear, and therefore sound levels cannot be added or subtracted through ordinary arithmetic. Two sound levels 10 dB apart differ in acoustic energy by a factor of 10. When the standard logarithmic decibel is A-weighted (dBA), an increase of 10 dBA is generally perceived as a doubling in loudness. For example, a 70-dBA sound is half as loud as an 80-dBA sound and twice as loud as a 60-dBA sound. When two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be three dB higher than one source under the same conditions. For example, a 65-dB source of sound, such as a truck, when joined by another 65 dB source results in a sound amplitude of 68 dB, not 130 dB (i.e., doubling the source strength increases the sound pressure by three dB). Under the decibel scale, three sources of equal loudness together would produce an increase of five dB. Typical noise levels associated with common noise sources are depicted on Figure 4.13-1, *Common Noise Levels*. (ECORP, 2021b, p. 4)

2. *Sound Propagation and Attenuation*

Noise can be generated by a number of sources, including mobile sources such as automobiles, trucks and airplanes, and stationary sources such as construction sites, machinery, and industrial operations. Sound spreads (propagates) uniformly outward in a spherical pattern, and the sound level decreases (attenuates) at a rate of approximately six dB for each doubling of distance from a stationary or point source. Sound from a line source, such as a highway, propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of approximately three dB for each doubling of distance from a line source, such as a roadway, depending on ground surface characteristics. No excess attenuation is assumed for hard surfaces like a parking lot or a body of water. Soft surfaces, such as soft dirt or grass, can absorb sound, so an excess ground-attenuation value of 1.5 dB per doubling of distance is normally assumed. For line sources, an overall attenuation rate of three dB per doubling of distance is assumed. (ECORP, 2021b, p. 6)



Figure 4.13-1 Common Noise Levels



Source: California Department of Transportation (Caltrans) 2020a (ECORP, 2021b, Figure 2)

Noise levels may also be reduced by intervening structures; generally, a single row of detached buildings between the receptor and the noise source reduces the noise level by about five dBA, while a solid wall or berm generally reduces noise levels by 10 to 20 dBA. However, noise barriers or enclosures specifically designed to reduce site-specific construction noise can provide a sound reduction 35 dBA or greater. To achieve the most potent noise-reducing effect, a noise enclosure/barrier must physically fit in the available space, must completely break the “line of sight” between the noise source and the receptors, must be free of degrading holes or gaps, and must not be flanked by nearby reflective surfaces. Noise barriers must be sizable enough to cover the entire noise source and extend lengthwise and vertically as far as feasibly possible to be most effective. The limiting factor for a noise barrier is not the component of noise transmitted through the material, but rather the amount of noise flanking around and over the barrier. In general, barriers contribute to decreasing noise levels only when the structure breaks the "line of sight" between the source and the receiver. (ECORP, 2021b, p. 6)



The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer residential units is generally 30 dBA or more. Generally, in exterior noise environments ranging from 60 dBA Community Noise Equivalent Level (CNEL)¹ to 65 dBA CNEL, interior noise levels can typically be maintained below 45 dBA, a typical residential interior noise standard, with the incorporation of an adequate forced air mechanical ventilation system in each residential building, and standard thermal-pane residential windows/doors with a minimum rating of Sound Transmission Class (STC) 28. (STC is an integer rating of how well a building partition attenuates airborne sound. In the U.S., it is widely used to rate interior partitions, ceilings, floors, doors, windows, and exterior wall configurations.) In exterior noise environments of 65 dBA CNEL or greater, a combination of forced-air mechanical ventilation and sound-rated construction methods is often required to meet the interior noise level limit. Attaining the necessary noise reduction from exterior to interior spaces is readily achievable in noise environments less than 75 dBA CNEL with proper wall construction techniques following California Building Code methods, the selections of proper windows and doors, and the incorporation of forced-air mechanical ventilation systems. (ECORP, 2021b, p. 6)

3. Noise Descriptors

The decibel scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Several rating scales have been developed to analyze the adverse effect of community noise on people. Because environmental noise fluctuates over time, these scales consider that the effect of noise on people is largely dependent on the total acoustical energy content of the noise, as well as the time of day when the noise occurs. The Leq is a measure of ambient noise, while the Ldn and CNEL (Community Noise Equivalent Level) are measures of community noise. Each is applicable to this analysis and defined in Table 4.13-1, *Common Acoustical Descriptors*. (ECORP, 2021b, p. 7)

The A weighted decibel sound level scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. Because sound levels can vary markedly over a short period of time, a method for describing either the average character of the sound or the statistical behavior of the variations must be utilized. Most commonly, environmental sounds are described in terms of an average level that has the same acoustical energy as the summation of all the time-varying events. (ECORP, 2021b, p. 8)

The scientific instrument used to measure noise is the sound level meter. Sound level meters can accurately measure environmental noise levels to within about ± 1 dBA. Various computer models are used to predict environmental noise levels from sources, such as roadways and airports. The accuracy of the predicted models depends on the distance between the receptor and the noise source. Close to the noise source, the models are accurate to within about ± 1 to 2 dBA. (ECORP, 2021b, p. 9)

¹ CNEL is a 24-hour average Leq with a 5 dBA “weighting” during the hours of 7:00 p.m. to 10:00 p.m. and a 10 dBA “weighting” added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. (ECORP, 2021b, Table 2)



Table 4.13-1 Common Acoustical Descriptors

Descriptor	Definition
Decibel, dB	A unit describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure. The reference pressure for air is 20.
Sound Pressure Level	Sound pressure is the sound force per unit area, usually expressed in micropascals (or 20 micronewtons per square meter), where 1 pascal is the pressure resulting from a force of 1 newton exerted over an area of 1 square meter. The sound pressure level is expressed in decibels as 20 times the logarithm to the base 10 of the ratio between the pressures exerted by the sound to a reference sound pressure (e.g., 20 micropascals). Sound pressure level is the quantity that is directly measured by a sound level meter.
Frequency, Hz	The number of complete pressure fluctuations per second above and below atmospheric pressure. Normal human hearing is between 20 Hz and 20,000 Hz. Infrasonic sound are below 20 Hz and ultrasonic sounds are above 20,000 Hz.
A-Weighted Sound Level, dBA	The sound pressure level in decibels as measured on a sound level meter using the A weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise.
Equivalent Noise Level, Leq	The average acoustic energy content of noise for a stated period of time. Thus, the Leq of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
L _{max} , L _{min}	The maximum and minimum A-weighted noise level during the measurement period.
L ₀₁ , L ₁₀ , L ₅₀ , L ₉₀	The A-weighted noise levels that are exceeded 1%, 10%, 50%, and 90% of the time during the measurement period.
Day/Night Noise Level, L _{dn} or DNL	A 24-hour average Leq with a 10 dBA “weighting” added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour Leq would result in a measurement of 66.4 dBA Ldn.
Community Noise Equivalent Level, CNEL	A 24-hour average Leq with a 5 dBA “weighting” during the hours of 7:00 p.m. to 10:00 p.m. and a 10 dBA “weighting” added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24-hour Leq would result in a measurement of 66.7 dBA CNEL.
Ambient Noise Level	The composite of noise from all sources near and far. The normal or existing level of environmental noise at a given location.
Intrusive	That noise which intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends on its amplitude, duration, frequency, and time of occurrence and tonal or informational content as well as the prevailing ambient noise level.
Decibel, dB	A unit describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure. The reference pressure for air is 20.

(ECORP, 2021b, Table 2)



4. Human Response to Noise

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels. (ECORP, 2021b, p. 9)

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semicommercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in A-weighted noise levels (dBA), the following relationships should be noted: (ECORP, 2021b, p. 9)

- Except in carefully controlled laboratory experiments, a change of 1 dBA cannot be perceived by humans.
- Outside of the laboratory, a 3-dBA change is considered a just-perceivable difference.
- A change in level of at least 5 dBA is required before any noticeable change in community response would be expected. An increase of 5 dBA is typically considered substantial.
- A 10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

5. Effects of Noise on People

Hearing Loss

While physical damage to the ear from an intense noise impulse is rare, a degradation of auditory acuity can occur even within a community noise environment. Hearing loss occurs mainly due to chronic exposure to excessive noise but may be due to a single event such as an explosion. Natural hearing loss associated with aging may also be accelerated from chronic exposure to loud noise. (ECORP, 2021b, p. 9)

The Occupational Safety and Health Administration (OSHA) has a noise exposure standard that is set at the noise threshold where hearing loss may occur from long-term exposures. The maximum allowable level is 90 dBA averaged over eight hours. If the noise is above 90 dBA, the allowable exposure time is correspondingly shorter. (ECORP, 2021b, p. 10)



Annoyance

Attitude surveys are used for measuring the annoyance felt in a community for noises intruding into homes or affecting outdoor activity areas. In these surveys, it was determined that causes for annoyance include interference with speech, radio and television, house vibrations, and interference with sleep and rest. The Ldn as a measure of noise has been found to provide a valid correlation of noise level and the percentage of people annoyed. People have been asked to judge the annoyance caused by aircraft noise and ground transportation noise. There continues to be disagreement about the relative annoyance of these different sources. For ground vehicles, a noise level of about 55 dBA Ldn is the threshold at which a substantial percentage of people begin to report annoyance. (ECORP, 2021b, p. 10)

B. Fundamentals of Environmental Groundborne Vibration

1. Vibration Sources and Characteristics

Sources of earthborne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or manmade causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions). (ECORP, 2021b, p. 10)

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Several different methods are typically used to quantify vibration amplitude. One is the peak particle velocity (PPV); another is the root mean square (RMS) velocity. The PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave. The RMS velocity is defined as the average of the squared amplitude of the signal. The PPV and RMS vibration velocity amplitudes are used to evaluate human response to vibration. (ECORP, 2021b, p. 10)

PPV is generally accepted as the most appropriate descriptor for evaluating the potential for building damage. For human response, however, an average vibration amplitude is more appropriate because it takes time for the human body to respond to the excitation (the human body responds to an average vibration amplitude, not a peak amplitude). Because the average particle velocity over time is zero, the RMS amplitude is typically used to assess human response. The RMS value is the average of the amplitude squared over time, typically a 1- second period. (ECORP, 2021b, p. 10)

Table 4.13-2, *Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibration Levels*, displays the reactions of people and the effects on buildings produced by continuous vibration levels. The annoyance levels shown in the table should be interpreted with care since vibration may be found to be annoying at much lower levels than those listed, depending on the level of activity or the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibration, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage. In high-noise environments, which are more prevalent where groundborne vibration approaches perceptible levels, this rattling phenomenon may also be produced by loud



airborne environmental noise causing induced vibration in exterior doors and windows. (ECORP, 2021b, pp. 10-11)

Table 4.13-2 Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibration Levels

Peak Particle Velocity (inches/second)	Approximate Vibration Velocity Level (VdB)	Human Reaction	Effect on Buildings
0.006–0.019	64–74	Range of threshold of perception	Vibrations unlikely to cause damage of any type
0.08	87	Vibrations readily perceptible	Recommended upper level to which ruins and ancient monuments should be subjected
0.1	92	Level at which continuous vibrations may begin to annoy people, particularly those involved in vibration sensitive activities	Virtually no risk of architectural damage to normal buildings
0.2	94	Vibrations may begin to annoy people in buildings	Threshold at which there is a risk of architectural damage to normal dwellings
0.4–0.6	98–104	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges	Architectural damage and possibly minor structural damage

(ECORP, 2021b, Table 3)

Ground vibration can be a concern in instances where buildings shake, and substantial rumblings occur. However, it is unusual for vibration from typical urban sources such as buses and heavy trucks to be perceptible. For instance, heavy-duty trucks generally generate groundborne vibration velocity levels of 0.006 PPV at 50 feet under typical circumstances, which as identified in Table 4.13-2 is considered very unlikely to cause damage to buildings of any type. Common sources for groundborne vibration are planes, trains, and construction activities such as earth-moving which requires the use of heavy-duty earth moving equipment. (ECORP, 2021b, p. 11)

C. Existing Environmental Noise Setting

1. Noise-Sensitive Land Uses

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as hospitals, historic sites, cemeteries, and certain recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses. (ECORP, 2021b, p. 11)



The Project Applicant is proposing onsite and offsite improvements. The nearest existing noise-sensitive land uses to the Project site are rural residences located on Horsethief Canyon Road as well as residences located in the Horsethief Canyon Ranch Community located directly adjacent to the southern and western Project site boundary. The installation of a proposed offsite water line would occur directly adjacent to a rural residence located on Horsethief Canyon Road. (ECORP, 2021b, p. 12)

D. Existing Ambient Noise Environment

The most common and significant source of noise in Riverside County is mobile noise generated by transportation-related sources. Other sources of noise are the various land uses (i.e., residential, commercial, and industrial) that generate stationary-source noise. The Project site is bound by I-15 to the north which is a major roadway within the County that serves a wide variety of residential, industrial, agricultural, and commercial land uses. (ECORP, 2021b, p. 12)

1. Existing Ambient Noise Measurements

The Project site can be characterized by undeveloped land that is largely flat. It is surrounded mainly by a mix of residential and undeveloped land. In order to quantify existing ambient noise levels in the Project area, ECORP conducted three long-term noise measurements, two spanning 24-hours and one spanning 15-hours, between July 6, 2020 and July 9, 2020. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the Project site (see Attachment A to the Project’s NIA, included as EIR *Technical Appendix JI*). The average noise levels and sources of noise measured at each location are listed in Table 4.13-3, *Existing (Baseline) Noise Measurements*.

Table 4.13-3 Existing (Baseline) Noise Measurements

Location Number	Location	CNEL	Leq dBA	Lmin dBA	Lmax dBA	Time
1	Tucked in shrubs north of the Horsethief Canyon Dog Park and south of Shotgun Trail.	57.3	53.8	33.0	84.7	10:01 a.m.- 3:01 a.m.
2	Tucked in shrubs north of the Horsethief Canyon Recreation Center and south of Mountain Road.	61.8	58.8	33.9	94.0	10:08a.m.-10:08a.m.
3	Unnamed neighborhood park at the intersection of Mountain Road and Bunkerhill Drive.	57.9	56.0	26.3	91.9	10:22a.m.-10:22a.m.

Note: Measurements were taken by ECORP with a Larson Davis SoundExpert LxT precision sound level meter, which satisfies the American National Standards Institute for general environmental noise measurement instrumentation. Prior to the measurements, the SoundExpert LxT sound level meter was calibrated according to manufacturer specifications with a Larson Davis CAL200 Class I Calibrator. See Attachment A for noise measurement outputs. (ECORP, 2021b, Table 4)



As shown in Table 4.13-3, the ambient recorded noise levels range from 57.3 to 61.8 dBA CNEL and 53.8 to 58.8 dBA Leq near the Project site. The most common noise in the Project vicinity is produced by automotive vehicles (e.g., cars, trucks, buses, motorcycles). Traffic moving along I-15 and other vicinity roadways produces a sound level that remains relatively constant and is part of the Project area's minimum ambient noise level. Vehicular noise varies with the volume, speed, and type of traffic. Slower traffic produces less noise than fast-moving traffic. Trucks typically generate more noise than cars. Infrequent or intermittent noise also is associated with vehicles, including sirens, vehicle alarms, slamming of doors, trains, garbage, and construction vehicle activity and honking of horns. These noises add to urban noise and are regulated by a variety of agencies.

2. Existing Roadway Noise Levels

Existing roadway noise levels were calculated for the roadway segments in the Project vicinity. This task was accomplished using the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108) (see Attachment B to the Project's NIA, included as *Technical Appendix J1*) and traffic volumes from the Project's Traffic Analysis ("TA"; EIR *Technical Appendix L2*). The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) used in the FHWA model have been modified to reflect average vehicle noise rates identified for California by Caltrans. The Caltrans data shows that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The average daily noise levels along these roadway segments are presented in Table 4.13-4, *Existing (Baseline) Traffic Noise Levels*. It is noted that the existing roadway traffic volumes were conducted prior to the currently ongoing COVID-19 pandemic. (ECORP, 2021b, p. 13)

As shown in Table 4.13-4, the existing traffic-generated noise level on Project-vicinity roadways currently ranges from 39.0 to 73.3 dBA CNEL at a distance of 100 feet from the centerline. As previously described, CNEL is 24-hour average noise level with a 5 dBA "weighting" during the hours of 7:00 p.m. to 10:00 p.m. and a 10 dBA "weighting" added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. (ECORP, 2021b, p. 14)

4.13.2 APPLICABLE ENVIRONMENTAL REGULATIONS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to noise

A. Federal Regulations

1. Noise Control Act of 1972

The Noise Control Act of 1972 establishes a national policy to promote an environment for all Americans free from noise that jeopardizes their health and welfare. The Act also serves to (1) establish a means for effective coordination of Federal research and activities in noise control; (2) authorize the establishment of Federal noise emission standards for products distributed in commerce; and (3) provide information to the public respecting the noise emission and noise reduction characteristics of such products. (EPA, n.d.)



Table 4.13-4 Existing (Baseline) Traffic Noise Levels

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway
De Palma Road		
North of Indian Truck Trail	Residential & Commercial	58.2
South of Indian Truck Trail	Residential & Commercial	62.5
Horsethief Canyon Road		
South of De Palma Road	Residential	58.0
Hostettler Road		
West of Bolo Court	Residential	49.2
East of Bolo Court	Residential	46.1
Bolo Court		
South of Hostettler Road	Residential	28.2
Lake Street		
South of Temescal Canyon Road	Residential & Industrial	60.5

Notes:

1. Traffic noise levels were calculated by ECORP using the FHWA roadway noise prediction model in conjunction with the trip generation rate identified by the Project’s TA (EIR *Technical Appendix L2*). Refer to Attachment B to the Project’s NIA (*Technical Appendix J1*) for traffic noise modeling assumptions and results.
2. A total of 12 intersections were analyzed in the Project’s TA; however, only roadway segments that impact sensitive receptors were included for the purposes of analysis. (ECORP, 2021b, Table 5)

While primary responsibility for control of noise rests with State and local governments, Federal action is essential to deal with major noise sources in commerce, control of which require national uniformity of treatment. The Environmental Protection Agency (EPA) is directed by Congress to coordinate the programs of all Federal agencies relating to noise research and noise control. (EPA, n.d.)

2. Federal Transit Administration

The Federal Transit Administration (FTA) has published a Noise and Vibration Impact Assessment (NVIA), which provides guidance for preparing and reviewing the noise and vibration sections of environmental documents. In the interest of promoting quality and uniformity in assessments, the manual is used by project sponsors and consultants in performing noise and vibration analyses for inclusion in environmental documents. The manual sets forth the methods and procedures for determining the level of noise and vibration impact resulting from most federally-funded transit projects and for determining what can be done to mitigate such impact. (FTA, 2006, p. 1-1)



The NVIA also establishes criteria for acceptable ground-borne vibration, which are expressed in terms of root mean square (rms) velocity levels in decibels and the criteria for acceptable ground-borne noise are expressed in terms of A-weighted sound levels. As shown in Table 4.13-5, *Ground-Borne Vibration and Ground-Borne Noise Impact Criteria for General Assessment*, the FTA identifies three categories of land uses and provides Ground-Based Vibration (GBV) and Ground-Based Noise (GBN) criteria for each category of land use. (FTA, 2006, pp. 8-3 and 8-4)

Table 4.13-5 Ground-Borne Vibration and Ground-Borne Noise Impact Criteria for General Assessment

Land Use Category	GBV Impact Levels (VdB re 1 micro-inch /sec)			GBN Impact Levels (dB re 20 micro Pascals)		
	Frequent Events ¹	Occasional Events ²	Infrequent Events ³	Frequent Events ¹	Occasional Events ²	Infrequent Events ³
Category 1: Buildings where vibration would interfere with interior operations.	65 VdB ⁴	65 VdB ⁴	65 VdB ⁴	N/A ⁴	N/A ⁴	N/A ⁴
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB	35 dBA	38 dBA	43 dBA
Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB	40 dBA	43 dBA	48 dBA

Notes:

1. "Frequent Events" is defined as more than 70 vibration events of the same source per day. Most rapid transit projects fall into this category.
 2. "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day. Most commuter trunk lines have this many operations.
 3. "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day. This category includes most commuter rail branch lines.
 4. This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration-sensitive manufacturing or research will require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the HVAC systems and stiffened floors.
 5. Vibration-sensitive equipment is generally not sensitive to ground-borne noise.
- (FTA, 2006, Table 8-1)

3. Federal Aviation Administration

The Federal Aviation Administration (FAA) regulates the maximum noise level that an individual civil aircraft can emit through requiring aircraft to meet certain noise certification standards. These standards designate changes in maximum noise level requirements by "stage" designation. The standard requires that the aircraft meet or fall below designated noise levels. For civil jet aircraft, there are four stages identified, with Stage 1 being the loudest and Stage 4 being the quietest. For helicopters, two different stages exist, Stage 1 and Stage 2. As with civil jet aircraft, Stage 2 is quieter than Stage 1. In addition, the FAA is currently working to adopt



the latest international standards for helicopters, which will be called Stage 3 and will be quieter than Stage 2. (FAA, 2020b)

The FAA has undertaken a phase out of older, noisier civil aircraft, resulting in some stages of aircraft no longer being in the fleet. Currently within the contiguous US, civil jet aircraft over 75,000 pounds maximum take-off weight must meet Stage 3 and Stage 4 to fly. In addition, aircraft at or under 75,000 pounds maximum take-off weight must meet Stage 2, 3, or 4 to operate within the U.S. In addition, by December 31, 2015, all civil jet aircraft, regardless of weight must meet Stage 3 or Stage 4 to fly within the contiguous U.S. Both Stage 1 and Stage 2 helicopters are allowed to fly within the U.S. (FAA, 2020b)

The U.S. noise standards are defined in the Code of Federal Regulations (CFR) Title 14 Part 36 – *Noise Standards: Aircraft Type and Airworthiness Certification* (14 CFR Part 36). The FAA publishes certificated noise levels in the advisory circular, *Noise Levels for U.S. Certificated and Foreign Aircraft*. This advisory circular provides noise level data for aircraft certificated under 14 CFR Part 36 and categorizes aircraft into their appropriate "stages." Any aircraft that is certified for airworthiness in the U.S. needs to also comply with noise standard requirements to receive a noise certification. The purpose of the noise certification process is to ensure that the latest available safe and airworthy noise reduction technology is incorporated into aircraft design and enables the noise reductions offered by those technologies to be reflected in reductions of noise experienced by communities. As noise reduction technology matures, the FAA works with the international community to determine if a new stringent noise standard is needed. If so, the international community through the International Civil Aviation Organization (ICAO) embarks on a comprehensive analysis to determine what that new standard will be. (FAA, 2016)

The current FAA noise standards applicable to new type certifications of jet and large turboprop aircraft is Stage 4. It is equivalent to the ICAO Annex 16, Volume 1 Chapter 4 standards. Recently, the international community has established and approved a more stringent standard within the ICAO Annex 16, Volume 1 Chapter 14, which became effective July 14, 2014. The FAA is adopting this standard and promulgating the rule for Stage 5 that is anticipated to be effective for new type certificates after December 31, 2017 and December 31, 2020, depending on the weight of the aircraft. The Notice of Proposed Rule Making (NPRM) for Stage 5 was published on January 14, 2016. (FAA, 2016)

For helicopters, the FAA has noise standards for a Stage 3 helicopter that became effective on May 5, 2014. These more stringent standards apply to new type helicopters and are consistent with ICAO Annex 16, Volume 1 Chapter 8 and Chapter 11. (FAA, 2016)

The FAA Modernization and Reform Act of 2012, in Section 513, had a prohibition on operating certain aircraft weighing 75,000 pounds or less not complying with Stage 3 noise levels, and on July 2, 2013, the FAA published a Final Rule in the Federal Register for the *Adoption of Statutory Prohibition the Operation of Jets Weighing 75,000 Pounds or Less That Are Not Stage 3 Noise Compliant*. In 1990, Congress passed the Aviation Noise and Capacity Act, which required that by the year 2000 all jet and large turboprop aircraft at civilian airports be Stage 3. (FAA, 2016)



4. Federal Highway Administration

The Federal Highway Administration (FHWA) is the agency responsible for administering the Federal-aid highway program in accordance with Federal statutes and regulations. The FHWA developed the noise regulations as required by the Federal-Aid Highway Act of 1970 (Public Law 91-605, 84 Stat. 1713). The regulation, 23 CFR 772 *Procedures for Abatement of Highway Traffic Noise and Construction Noise*, applies to highway construction projects where a State department of transportation has requested Federal funding for participation in the project. The regulation requires the highway agency to investigate traffic noise impacts in areas adjacent to federally-aided highways for proposed construction of a highway on a new location or the reconstruction of an existing highway to either significantly change the horizontal or vertical alignment or increase the number of through-traffic lanes. If the highway agency identifies impacts, it must consider abatement. The highway agency must incorporate all feasible and reasonable noise abatement into the project design. (FHWA, 2017)

The FHWA regulations for mitigation of highway traffic noise in the planning and design of federally aided highways are contained in Title 23 of the United States Code of Federal Regulations Part 772. The regulations require the following during the planning and design of a highway project:

- Identification of traffic noise impacts;
- Examination of potential mitigation measures;
- The incorporation of reasonable and feasible noise mitigation measures into the highway project; and
- Coordination with local officials to provide helpful information on compatible land use planning and control. (FHWA, 2017)

The regulations contain noise abatement criteria, which represent the upper limit of acceptable highway traffic noise for different types of land uses and human activities. The regulations do not require meeting the abatement criteria in every instance. Rather, they require highway agencies make every reasonable and feasible effort to provide noise mitigation when the criteria are approached or exceeded. Compliance with the noise regulations is a prerequisite for the granting of Federal-aid highway funds for construction or reconstruction of a highway. (FHWA, 2017)

5. Construction-Related Hearing Conservation

The Occupational Safety and Health Administration (OSHA) hearing conservation program is designed to protect workers with significant occupational noise exposures from hearing impairment even if they are subject to such noise exposures over their entire working lifetimes. Standard 29 CFR, Part 1910 indicates the noise levels under which a hearing conservation program is required to be provided to workers exposed to high noise levels. (OSHA, 2002) This analysis does not evaluate the noise exposure of construction workers within the Project site based on CEQA requirements, and instead, evaluates the Project-related construction noise levels at the nearby sensitive receiver locations in the Project study area. Further, periodic exposure to high noise levels in short duration, such as Project construction, is typically considered an annoyance and not impactful to human health. It would take several years of exposure to high noise levels to result in hearing impairment.



B. State Regulations

1. Building Standards Code

The State of California’s noise insulation standards are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 2, and the California Building Standards Code. These noise standards are applied to new construction in California for the purpose of controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are developed near major transportation noise sources, and where such noise sources create an exterior noise level of 60 dBA CNEL or higher. Acoustical studies that accompany building plans for noise-sensitive land uses must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL. (BSC, n.d.)

2. California Noise Insulation Standards

The California Noise Insulation Standards (CCR Title 25 Section 1092) establish uniform minimum noise insulation performance standards for new hotels, motels, dormitories, apartment houses, and dwellings other than detached single-family dwellings. Specifically, Title 25 specifies that interior noise levels attributable to exterior sources shall not exceed 45 dBA Ldn/CNEL (i.e., the same levels that the EPA recommends for residential interiors) in any habitable room of a new dwelling. An acoustical study must be prepared for proposed multiple unit residential and hotel/motel structures where outdoor Ldn/CNEL is 60 dBA or greater. The study must demonstrate that the design of the building would reduce interior noise to 45 dBA Ldn/CNEL or lower. Because noise levels can increase over time in developing areas, Title 25 also specifies that dwellings are to be designed so that interior noise levels will meet this standard for at least ten years from the time of building permit application. (MLA, n.d.)

3. OPR General Plan Guidelines

Though not adopted by law, the 2017 California General Plan Guidelines, published by the California Governor’s Office of Planning and Research (OPR), provides guidance for local agencies in preparing or updating General Plans. The Guidelines provide direction on the required Noise Element portion of the General Plans. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. Local governments must “analyze and quantify” noise levels and the extent of noise exposure through actual measurement or the use of noise modeling. Technical data relating to mobile and point sources must be collected and synthesized into a set of noise control policies and programs that “minimizes the exposure of community residents to excessive noise.” Noise level contours must be mapped and the conclusions of the element used as a basis for land use decisions. The element must include implementation measures and possible solutions to existing and foreseeable noise problems. Furthermore, the policies and standards must be sufficient to serve as a guideline for compliance with sound transmission control requirements. The noise element directly correlates to the Land Use, Circulation, and Housing Elements. The Noise Element must be used to guide decisions concerning land use and the location of new roads and transit facilities since these are common sources of excessive noise levels. The noise levels from existing land uses, including mining,



agricultural, and industrial activities, must be closely analyzed to ensure compatibility, especially where residential and other sensitive receptors have encroached into areas previously occupied by these uses. (OPR, 2017b, pp. 131-132)

C. Local Regulations

1. Riverside County General Plan

The County of Riverside has adopted a Noise Element of the General Plan to control and abate environmental noise, and to protect the citizens of the County of Riverside from excessive exposure to noise. The Noise Element specifies the maximum allowable exterior noise levels for new developments impacted by transportation noise sources such as arterial roads, freeways, airports, and railroads. In addition, the Noise Element identifies several polices to minimize the impacts of excessive noise levels throughout the community and establishes noise level requirements for all land uses. To protect County of Riverside residents from excessive noise, the Noise Element contains the following policies related to the Project:

- N 1.1 Protect noise-sensitive land uses from high levels of noise by restricting noise-producing land uses from these areas. If the noise-producing land use cannot be relocated, then noise buffers such as setbacks, landscaping, or block walls shall be used.*
- N 1.2 Guide noise-tolerant land uses into areas irrevocably committed to land uses that are noise-producing, such as transportation corridors or within the projected noise contours of any adjacent airports.*
- N 1.3 Consider the following uses noise-sensitive and discourage these uses in areas in excess of 65 CNEL:*
 - o Schools*
 - o Hospitals*
 - o Rest Homes*
 - o Long Term Care Facilities*
 - o Mental Care Facilities*
 - o Residential Uses*
 - o Libraries*
 - o Passive Recreation Uses*
 - o Places of Worship*
- N 1.4 Determine if existing land uses will present noise compatibility issues with proposed projects by undertaking site surveys.*
- N 1.5 Prevent and mitigate the adverse impacts of excessive noise exposure on the residents, employees, visitors, and noise-sensitive uses of Riverside County.*
- N 1.7 Require proposed land uses, affected by unacceptably high noise levels, to have an acoustical specialist prepare a study of the noise problems and recommend structural and site design features that will adequately mitigate the noise problem.*



N 2.3 Mitigate exterior and interior noises to the levels listed in Table N-2 [Table 4.13-6 below] below to the extent feasible, for stationary sources:

Table 4.13-6 Stationary Source Land Use Noise Standards (Residential)

Time	Interior Standards	Exterior Standards
10:00 p.m. to 7:00 a.m.	40 Leq (10 minute)	45 Leq (10 minute)
7:00 a.m. to 10:00 p.m.	55 Leq (10 minute)	65 Leq (10 minute)

N 3.3 Ensure compatibility between industrial development and adjacent land uses. To achieve compatibility, industrial development projects may be required to include noise mitigation measures to avoid or minimize project impacts on adjacent uses.

N 4.1 Prohibit facility-related noise, received by any sensitive use, from exceeding the following worst-case noise levels:

- a. 45 dBA 10-minute Leq between 10:00 p.m. and 7:00 a.m.;*
- b. 65 dBA 10-minute Leq between 7:00 a.m. and 10:00 p.m.*

N 4.2 Develop measures to control non-transportation noise impacts.

N 4.3 Ensure any use determined to be a potential generator of significant stationary noise impacts be properly analyzed and ensure that the recommended mitigation measures are implemented.

N 4.5 Encourage major stationary noise-generating sources throughout the County of Riverside to install additional noise buffering or reduction mechanisms within their facilities to reduce noise generation levels to the lowest extent practicable prior to the renewal of conditional use permits or business license or prior to the approval and/or issuance of new conditional use permits for said facilities.

N 4.8 Require that the parking structures, terminals, and loading docks of commercial or industrial land uses be designed to minimize the potential noise impacts of vehicles on the site as well as on adjacent land uses.

N 6.3 Require commercial or industrial truck delivery hours be limited when adjacent to noise sensitive land uses unless there is no feasible alternative or there are overriding transportation benefits.

N 12.1 Utilize natural barrier such as hills, berms, boulders, and dense vegetation to assist in noise reduction.

N 13.1 Minimize the impacts of construction noise on adjacent uses within acceptable standards.

N 13.2 Ensure that construction activities are regulated to establish hours of operation in order to prevent and/or mitigate the generation of excessive or adverse impacts on surrounding areas.

N 13.3 Condition subdivision approval adjacent to developed/occupied noise-sensitive land uses (see policy N 1.3) by requiring the developer to submit a construction-related noise mitigation plan



- to the [County] for review and approval prior to issuance of a grading permit. The plan must depict the location of construction equipment and how the noise from this equipment will be mitigated during construction of this project, through the use of such methods as:*
- i. Temporary noise attenuation fences;*
 - ii. Preferential location and equipment; and*
 - iii. Use of current noise suppression technology and equipment.*
- N 13.4 Require that all construction equipment utilizes noise reduction features (e.g. mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.*
- N 14.1 Enforce the California Building Standards that sets standards for building construction to mitigate interior noise levels to the tolerable 45 CNEL limit. These standards are utilized in conjunction with the Uniform Building Code by the County's Building Department to ensure that noise protection is provided to the public. Some design features may include extra-dense insulation, double-paned windows, and dense construction materials.*
- N 14.3 Incorporate acoustic site planning into the design of new development, particularly large scale, mixed-use, or master planned development, through measures which may include:*
- o Separation of noise sensitive building from noise generating sources.*
 - o Use of natural topography and intervening structures to shield noise sensitive land uses.*
 - o Adequate sound proofing within the receiving structure.*
- N 14.4 Consider and, when necessary, to lower noise to acceptable limits, require noise barriers and landscaped berms.*
- N 14.5 Consider the issue of adjacent residential land uses when designing and configuring all new, nonresidential development. Design and configure on site ingress and egress points that divert traffic away from nearby noise sensitive land uses to the greatest degree practicable.*
- N 14.8 Review all development applications for consistency with the standards and policies of the Noise Element of the General Plan.*
- N 16.2 Consider the following land uses sensitive to vibration:*
- o Hospitals*
 - o Residential areas*
 - o Concert halls*
 - o Libraries*
 - o Sensitive research operations*
 - o Schools*
 - o Offices*



N 16.3 Prohibit exposure of residential dwellings to perceptible ground vibration from passing trains as perceived at the ground or second floor. Perceptible motion shall be presumed to be a motion velocity of 0.01 inches/second over a range of 1 to 100 Hz.

N 19.5 Require new developments that have the potential to generate significant noise impacts to inform impacted users on the effects of these impacts during the environmental review process.

To ensure noise-sensitive land uses are protected from high levels of noise (N 1.1), Table N-1 of the Noise Element identifies guidelines to evaluate proposed developments based on exterior and interior noise level limits for land uses and requires a noise analysis to determine needed mitigation measures if necessary. The Noise Element identifies residential use as a noise-sensitive land use (N 1.3) and discourages new development in areas with transportation related levels of 65 dBA CNEL or greater existing ambient noise levels. To prevent and mitigate noise impacts for its residents (N 1.5), County of Riverside requires noise attenuation measures for sensitive land use exposed to transportation related noise levels higher than 65 dBA CNEL. Policy N 4.1 of the Noise Element sets a stationary-source exterior noise limit to not to be exceeded for a cumulative period of more than ten minutes in any hour of 65 dBA Leq for daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA Leq during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m. To prevent high levels of construction noise from impacting noise-sensitive land uses, policies N 13.1 through 13.3 identify construction noise mitigation requirements for new development located near existing noise-sensitive land uses. Policy N 16.3 establishes the vibration perception threshold for rail-related vibration levels, used in this analysis as a threshold for determining potential vibration impacts due to Project construction.

Land Use Compatibility

The noise criteria identified in the County of Riverside Noise Element (Table N-1) are guidelines to evaluate the land use compatibility of transportation related noise. The compatibility criteria, shown on Table 4.13-7, *Land Use Compatibility for Community Noise Exposure*, provides the County with a planning tool to gauge the compatibility of land uses relative to existing and future exterior noise levels.

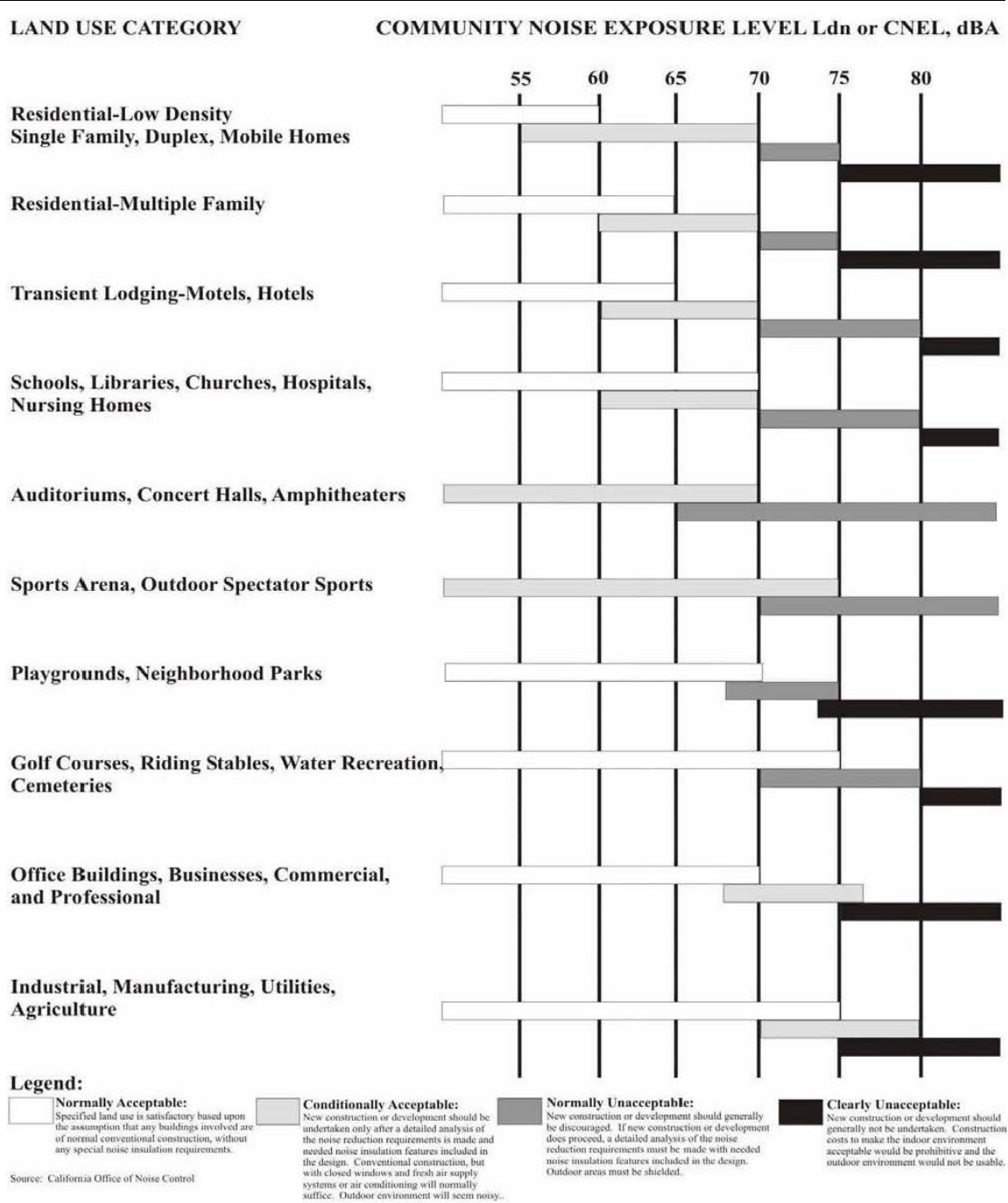
Table 4.13-7 describes categories of compatibility and not specific noise standards. Residentially-designated land uses in the Project study area are considered normally acceptable with exterior noise levels below 60 dBA CNEL, and conditionally acceptable with exterior noise levels of up to 70 dBA CNEL. For conditionally-acceptable exterior noise levels, approaching 80 dBA CNEL for Project land uses, new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and the needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

2. Construction Noise Standards

To control noise impacts associated with the construction of projects, such as the proposed Project, the County of Riverside has established limits to the hours of operation. Section 2.i of Riverside County Ordinance No. 847 (herein, “Noise Ordinance”) indicates that noise associated with any private construction activity located



Table 4.13-7 Land Use Compatibility for Community Noise Exposure



Source: County of Riverside General Plan Noise Element, Table N-1.

within one-quarter of a mile from an inhabited dwelling is considered exempt between the hours of 6:00 a.m. and 6:00 p.m., during the months of June through September, and 7:00 a.m. and 6:00 p.m., during the months of October through May. Neither the County’s General Plan nor Municipal Code establish numeric maximum



acceptable construction source noise levels at potentially affected receivers, which would allow for a quantified determination of what CEQA constitutes a substantial temporary or periodic noise increase.

To evaluate whether the Project would generate potentially significant construction noise levels at off-site sensitive receiver locations, a construction-related noise level threshold is adopted from the *Criteria for Recommended Standard: Occupational Noise Exposure* prepared by the National Institute for Occupational Safety and Health (NIOSH). A division of the U.S. Department of Health and Human Services, NIOSH identifies a noise level threshold based on the duration of exposure to the source. The construction related noise level threshold starts at 85 dBA for more than eight hours per day, and for every 3-dBA increase, the exposure time is cut in half. This results in noise level thresholds of 88 dBA for more than four hours per day, 92 dBA for more than one hour per day, 96 dBA for more than 30 minutes per day, and up to 100 dBA for more than 15 minutes per day. For the purposes of analysis, the lowest, more conservative construction noise level threshold of 85 dBA Leq is used as an acceptable threshold for construction noise at the nearby sensitive receiver locations. Since this construction-related noise level threshold represents the energy average of the noise source over a given time, they are expressed as Leq noise levels. Therefore, the noise level threshold of 85 dBA Leq over a period of eight hours or more is used to evaluate the potential Project-related construction noise level impacts at the nearby sensitive receiver locations.

The NIOSH 85 dBA Leq construction noise level threshold used in this analysis is consistent with similar construction noise level thresholds identified by the Federal Transit Administration (FTA) that are specific to noise-sensitive residential uses. The FTA *Transit Noise and Vibration Impact Assessment* identifies a daytime construction noise level threshold of 90 dBA Leq for general assessment. As such, the NIOSH 85 dBA Leq threshold used in the Project's NIA (*Technical Appendix JI*) to identify potential impacts is more conservative than the FTA threshold which is specific to construction noise at residential receiver locations. In addition, the NIOSH threshold has been used in several other technical noise studies and environmental impact reports prepared in the County of Riverside.

Consistent with the NIOSH 85 dBA Leq construction noise level threshold, the Occupational Safety and Health Administration (OSHA) requires employers to implement a hearing conservation program when noise exposure is at or above 85 dBA over 8 working hours. Workers are required to wear hearing protection when engaged in work that exposes them to noise that equals or exceeds 85 dBA over 8 working hours. This analysis does not evaluate the noise exposure of construction workers within the Project site based on CEQA requirements, and instead, evaluates the Project-related construction noise levels at the nearby sensitive receiver locations using a construction noise level threshold that is consistent with guidelines and standards identified by NIOSH, FTA, and OSHA.

3. Vibration Standards

The County of Riverside does not have vibration standards for temporary construction, but the County's General Plan Noise Element does contain the human reaction to typical vibration levels. Vibration levels with peak particle velocity of 0.0787 inches per second are considered readily perceptible and above 0.1968 in/sec are considered annoying to people in buildings. Further, County of Riverside General Plan Policy N 16.3



identifies a motion velocity perception threshold for vibration due to passing trains of 0.01 inches per second (in/sec) over the range of one to 100 Hz, which is used in the Project's NIA (*Technical Appendix J1*) to assess potential impacts due to Project construction vibration levels.

4. Operational Noise Standards

The County of Riverside has set stationary-source hourly average Leq exterior noise limits to control roof-top air conditioning units, drive-through speakerphones, parking lot vehicle movements, loading docks and sports park activities associated with the development of the proposed Project. These Project-related stationary noises, as projected to any portion of any surrounding property containing a habitable dwelling, hospital, school, library, or nursing home, must not exceed the following worst-case noise levels. Policy N 4.1 of the County of Riverside General Plan Noise Element sets a stationary-source average Leq exterior noise limit not to be exceeded for a cumulative period of more than ten minutes in any hour of 65 dBA Leq for daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA Leq during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m.

However, Riverside County Ordinance No. 847 specifies that occupied properties designated by the General Plan for residential uses shall not be exposed to operational noise levels exceeding 55 dBA Lmax for daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA Lmax during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m. Based on consultation with the County of Riverside Department of Environmental Health (DEH), Office of Industrial Hygiene (OIH), it is important to recognize that the County of Riverside Municipal Code noise level standards incorrectly identify maximum noise level (Lmax) standards that should instead reflect the average Leq noise levels. Moreover, the County of Riverside DEH OIH's April 15th, 2015, *Requirements for Determining and Mitigating, Non-Transportation Noise Source Impacts to Residential Properties*, also identifies operational (stationary-source) noise level limits using the Leq metric, consistent with the direction of the County of Riverside General Plan guidelines and standards provided in the Noise Element. Therefore, the Project's NIA (*Technical Appendix J1*) has been prepared consistent with direction of the County of Riverside DEH OIH guidelines and standards using the Municipal Code average Leq noise level metric for stationary-source (operational) noise level evaluation. Thus, operational noise levels would be significant if they expose residentially-designated properties to noise levels exceeding 55 dBA Leq for daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA Leq during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m.

4.13.3 BASIS FOR DETERMINING SIGNIFICANCE

A. Significance Thresholds

Section XIII of Appendix G to the State CEQA Guidelines, as updated in December 2018, addresses typical adverse effects due to noise, and includes the following threshold questions to evaluate the Project's impacts due to noise (OPR, 2018a):

- Would the project result in the 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 or noise ordinance, or applicable standards of other agencies;



- Would the project result in the generation of excessive groundborne vibration or noise levels; or
- For a project located within the vicinity of a private airstrip or an airport land use plan, or where such a plan has not been adopted, within two 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.

Significance thresholds are set forth in Riverside County’s Environmental Assessment Checklist, and includes the following threshold questions to evaluate the Project’s impacts due to 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?*
- 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?*
- c. Would the Project result in the 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?*
- d. Would the Project result in the generation of excessive ground-borne vibration or ground-borne noise levels?*

The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist, as modified/updated per the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project’s impacts due to noise.

B. Significance Criteria

1. Airport-Related Noise

Impacts would be potentially significant under Thresholds a. and/or b. if the Project were to exacerbate existing airport-related noise in the local area, or if the future development on site would be exposed to airport-related noise that exceeds the land use compatibility criteria presented in the County’s General Plan Noise Element (refer to Table 4.13-7, previously presented).

2. Construction-Related Noise

Riverside County’s regulations with respect to noise are included in Riverside County Ordinance No. 847 (Regulating Noise). Section 2 of Ordinance No. 847 (Exemptions) exempts construction noise provided that private construction projects located within one-quarter of a mile from an inhabited dwelling adhere to the following: (ECORP, 2021b, p. 20)

- Construction does not occur between the hours of 6:00 p.m. and 6:00 a.m. during the months of June through September, and



- Construction does not occur between the hours of 6:00 p.m. and 7:00 a.m. during the months of October through May.

The County does not establish numeric maximum acceptable construction source noise levels at potentially affected receptors, which would allow for a quantified determination of what constitutes a substantial temporary or periodic noise increase. To evaluate whether a project would generate potentially significant construction noise levels at offsite sensitive receptor locations, the County relies on a construction-related noise level threshold from the *Criteria for Recommended Standard: Occupational Noise Exposure* prepared by the National Institute for Occupational Safety and Health (NIOSH). A division of the U.S. Department of Health and Human Services, NIOSH identifies a noise level threshold based on the duration of exposure to the source. The construction related noise level threshold starts at 85 dBA for more than eight hours per day, and for every 3-dBA increase, the exposure time is cut in half. This results in noise level thresholds of 88 dBA for more than four hours per day, 92 dBA for more than one hour per day, 96 dBA for more than 30 minutes per day, and up to 100 dBA for more than 15 minutes per day. For the purposes of analysis, the lowest, more conservative construction noise level threshold of 85 dBA Leq is used as an acceptable threshold for construction noise at the nearby sensitive receiver locations. Since this construction-related noise level threshold represents the energy average of the noise source over a given time, they are expressed as Leq noise levels. Therefore, the noise level threshold of 85 dBA Leq over a period of eight hours or more is used to evaluate the potential Project-related construction noise level impacts at the nearby sensitive receiver locations. (ECORP, 2021b, p. 25)

3. Operational-Related Noise

Noise-sensitive land uses with the potential to be affected by Project-related operational noise occur within unincorporated Riverside County. Accordingly, for purposes of analysis, Project-related stationary-source (operational) noise impacts would be considered significant if Project-related noise exposes nearby sensitive receptors to noise levels that exceed the noise standards identified by Riverside County Ordinance No. 847. For properties designated by the General Plan for residential use, Ordinance No. 847 specifies a maximum operational noise standard of 55 dBA Leq for daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA Leq during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m. (ECORP, 2021b, pp. 17-18)

4. Traffic-Related Noise

The County of Riverside relies on the FICON thresholds of significance for evaluating the impact of increased traffic noise. The 2000 FICON findings provide guidance as to the significance of changes in ambient noise levels due to transportation noise sources. FICON recommendations are based on studies that relate aircraft and traffic noise levels to the percentage of persons highly annoyed by the noise. FICON's measure of substantial increase for transportation noise exposure is as follows: (ECORP, 2021b, p. 22)

- If the existing ambient noise levels at existing noise-sensitive land uses (e.g. residential, etc.) are less than 60 dBA CNEL and the Project creates a readily perceptible 5 dBA CNEL or greater Project-related noise level increase and the resulting noise level would exceed acceptable exterior noise standards; or



- If the existing noise levels range from 60 to 65 dBA CNEL and the Project creates a barely perceptible 3 dBA CNEL or greater Project-related noise level increase and the resulting noise level would exceed acceptable exterior noise standards; or
- If the existing noise levels already exceed 65 dBA CNEL, and the Project creates a community noise level increase of greater than 1.5 dBA CNEL.

5. Vibration

Riverside County does not regulate vibrations associated with construction or operational vibration sources. However, County General Plan Policy N 16.3 identifies a standard of 0.01 inch per second RMS for assessing groundborne vibration from rail-related activities. As previously identified in Table 4.13-2, this level of ground vibration equates to the range of human perception and is unlikely to cause damage to any type of building. Accordingly, and although the Project would not result in any noise or vibration associated with rail lines, Project construction or operational vibration levels exceeding 0.01 inch per second RMS represent a potentially significant impact, consistent with General Plan Policy N 16.3.

4.13.4 IMPACT ANALYSIS

Threshold 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?*

Threshold 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?*

The Project does not include an airport-related component, and the Project has no potential to contribute to or cause increased airport-related noise in the local area; thus, no direct impact would occur.

There are no public or private airports located within two miles of the Project site. The closest public airport is the Corona Municipal Airport located roughly 14.5 miles northwest of the Project site. According to Map CO-3 of the Riverside County Airport Land Use Compatibility Plan Policy Document, the Project site is located well outside of the 55 dBA CNEL contour for the Corona Municipal Airport, which is considered “normally acceptable” for light industrial and business park land uses pursuant to Table N-1 of the Riverside County General Plan (refer to Table 4.13-7, previously presented). Because the Project site would not be exposed to airport-related noise levels exceeding 55 dBA CNEL, the Project would not expose people residing or working in the area to excessive noise levels associated with operations at the Corona Municipal Airport, and impacts would be less than significant. (RCALUC, 2004, Map CO-3; Google Earth, 2018)

Additionally, the Project site is located approximately 8.8 miles northwest of Skylark Field, which is a private airport located within the City of Lake Elsinore (Google Earth, 2018). According to the EIR prepared for the City of Lake Elsinore General Plan, the predicted future peak hour unmitigated exterior aircraft noise level at Skylark Field were estimated to range from 51.3 dBA to 66.7 dBA Leq, and the unmitigated 24-hour CNEL from the airstrip was estimated to be between 51.8 to 63.2 CNEL (Lake Elsinore, 2011, p. 3.5-51). These



noise levels are considered “normally acceptable” for light industrial and business park land uses pursuant to Table N-1 of the Riverside County General Plan (refer to Table 4.13-7, previously presented). Furthermore, due to the distance between the Project site and Skylark Field, the Project site would be exposed to noise levels far below 66.7 dBA Leq. Accordingly, airport-related noise impacts associated with Skylark Field would be less than significant.

Threshold c.: *Would the Project result in the 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?*

The Project has the potential to result in substantial temporary or periodic noise impacts during Project construction, and has the potential to result in permanent increases in ambient noise levels associated with site operations as well as from Project-related traffic. Each is discussed below.

A. Construction Noise Impacts

Construction noise associated with the proposed Project would be temporary and would vary depending on the nature of the activities being performed. Noise generated would primarily be associated with the operation of off-road equipment for onsite construction activities as well as construction vehicle traffic on area roadways. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, building construction, paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). During construction, exterior noise levels could negatively affect sensitive land uses in the vicinity of the construction site. (ECORP, 2021b, p. 24)

1. Onsite Construction Noise

Nearby noise-sensitive land uses consist of rural residences located on Horsethief Canyon Road as well as residences located in the Horsethief Canyon Ranch Community located directly adjacent to the southern and western Project site boundaries. As previously described, Riverside County Ordinance No. 847 prohibits construction noise between the hours of 6:00 p.m. and 6:00 a.m. during the months of June through September, and between the hours of 6:00 p.m. and 7:00 a.m. during the months of October through May. The County does not promulgate a numeric threshold pertaining to the noise associated with construction. This is due to the fact that construction noise is temporary, short term, intermittent in nature, and would cease on completion of the Project. Furthermore, construction would occur throughout the Project site and would not be concentrated at one point. (ECORP, 2021b, p. 24)

Additionally, the County of Riverside Board of Supervisors Good Neighbor Policy for Logistics and Warehouse/Distribution Uses (Riverside County Board of Supervisors Policy F-3) contains several policy provisions to limit construction noise. For instance, Provision 2.4 requires that all construction contractors of



warehouse projects that include any building larger than 250,000 square feet in size to utilize construction equipment, with properly operating and maintained mufflers, consistent with manufacturers' standards. Provision 2.5 states that construction contractors must locate or park all stationary construction equipment so that the emitted noise is directed away from sensitive receptors nearest the Project site, to the extent practicable. Lastly, Provision 2.9 requires construction contractors to prohibit truck drivers from idling more than five minutes and require operators to turn off engines when not in use. All construction would be required to adhere to the best management practices established in the County of Riverside Board of Supervisors Good Neighbor Policy for Logistics and Warehouse/Distribution Uses. (ECORP, 2021b, p. 24; Riverside County, 2019c)

To estimate the worst-case onsite construction noise levels that may occur at the nearest noise-sensitive receptor in the Project vicinity, typical construction equipment noise levels were calculated using the Roadway Noise Construction Model and compared against the construction-related noise level threshold identified by NIOSH, as previously described. For the purposes of analysis, the lowest, more conservative NIOSH threshold of 85 dBA Leq is used as an acceptable threshold for construction noise at the nearby sensitive receptors. (ECORP, 2021b, p. 25)

The anticipated short-term construction noise levels generated for the necessary equipment were calculated using the Roadway Noise Construction Model for the site preparation, grading, building construction, paving, and painting anticipated for the proposed Project. Consistent with FTA recommendations for calculating construction noise, construction noise was measured from the center of the Project site. The anticipated short-term construction noise levels generated for the necessary equipment is presented in Table 4.13-8, *Onsite Construction Average (dBA) Noise Levels at Nearest Receptors*. (ECORP, 2021b, p. 25)

As shown in Table 4.13-8, during onsite construction activities no individual or cumulative piece of construction equipment would exceed the NIOSH threshold of 85 dBA Leq at the nearest potential receptors to onsite construction. As such, on-site construction related noise would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project, and impacts would therefore be less than significant. (ECORP, 2021b, p. 27)

2. Offsite Construction Noise

Offsite construction noise would result from the installation of offsite water improvements on Horsethief Canyon Road, between the northwest corner of the Project site and an existing point of connection located north of I-15. Nearby noise-sensitive land uses consist of a residential land use approximately 25 feet west of the Project boundary. This activity would include excavators, backhoes, pavers, and other equipment. The anticipated short-term offsite construction noise levels generated for the necessary equipment is presented in Table 4.13-9, *Offsite Construction Average (dBA) Noise Levels at Nearest Receptor*. Offsite construction noise will be compared to the NIOSH construction noise threshold of 85 dBA Leq. As shown in Table 4.13-9, construction noise levels would exceed the NIOSH noise threshold of 85 dBA at the adjacent sensitive receptor during offsite improvements. This is evaluated as a significant impact for which mitigation would be required. (ECORP, 2021b, pp. 27-29)



Table 4.13-8 Onsite Construction Average (dBA) Noise Levels at Nearest Receptors

Equipment	Estimated Exterior Construction Noise Level at Nearest Residences	Construction Noise Standards (dBA Leq)	Exceeds Standards?
Site Preparation			
Rubber Tired Dozer (6)	55.7 (each)	85	No
Tractors/Loaders/Backhoes (8)	58.0 (each)	85	No
Combined Site Preparation Equipment	68.6	85	No
Grading			
Excavators (4)	54.7 (each)	85	No
Graders (2)	59.0 (each)	85	No
Rubber Tired Dozers (2)	55.7 (each)	85	No
Scrapers (4)	57.6 (each)	85	No
Tractors/Loaders/Backhoes (4)	58.0 (each)	85	No
Combined Grading Equipment	69.2	85	No
Building Construction, Paving & Painting			
Cranes (2)	50.6 (each)	85	No
Forklifts (6)	57.4 (each)	85	No
Generator Sets (2)	55.6 (each)	85	No
Tractors/Loaders/Backhoes (6)	58.0 (each)	85	No
Welders (2)	48.0 (each)	85	No
Pavers (4)	52.2 (each)	85	No
Paving Equipment (4)	60.5 (each)	85	No
Rollers (4)	51.0 (each)	85	No
Air Compressors (2)	51.7 (each)	85	No
Combined Building Construction, Paving & Paining Equipment	71.5	85	No

Notes:

1. Construction noise levels were calculated by ECORP Consulting using the FHWA Roadway Noise Construction Model. Refer to Attachment C to the Project’s NIA (*Technical Appendix JI*) for Model Data Outputs.
2. Construction equipment used during construction derived from CalEEMod 2016.3.2. The distance to the nearest residence was measured from the center of Planning Area 1 (Business Park) of proposed SP 333A1 to the rural residence located directly adjacent to the western Project site boundary, approximately 630 feet distant.
3. Leq = The equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the Leq of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night. (ECORP, 2021b, Table 8)



Table 4.13-9 Offsite Construction Average (dBA) Noise Levels at Nearest Receptor

Equipment	Estimated Exterior Construction Noise Level at Nearest Residence	Construction Noise Standards (dBA Leq)	Exceeds Standards?
Site Preparation			
Graders (1)	87.0	85	Yes
Tractors/Loaders/Backhoes (1)	86.0	85	Yes
Combined Site Preparation Equipment	89.6	85	Yes
Instillation of Water Line (Trenching)			
Forklifts (1)	85.4	85	Yes
Tractors/Loaders/Backhoes (1)	86.0	85	Yes
Excavators (1)	82.8	85	Yes
Concrete/Industrial Saws (1)	88.6	85	Yes
Combined Trenching Equipment	92.2	85	Yes
Paving & Painting			
Cement and Mortar Mixers (1)	80.8	85	No
Pavers (1)	80.2	85	No
Rollers (1)	79.0	85	No
Tractors/Loaders/Backhoes (1)	86.0	85	No
Air Compressors (1)	79.7	85	No
Combined Paving & Painting Equipment	89.0	85	No

Notes:

1. Construction noise levels were calculated by ECORP Consulting using the FHWA Roadway Noise Construction Model. Refer to Attachment C to the Project’s NIA (*Technical Appendix J1*) for Model Data Outputs.
2. Construction equipment used during construction derived from CalEEMod 2016.3.2. The distance to the nearest residence is approximately 25 feet west of the Project site.
3. Leq = The equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the Leq of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
(ECORP, 2021b, Table 9)

B. Project Operational Noise Impacts

As previously described, noise-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would each be considered noise-sensitive and may warrant unique measures for protection from intruding noise. The existing nearest noise-sensitive land uses to the Project site are rural residences located on Horsethief Canyon Road as well as residences located in the Horsethief Canyon



Ranch Community located directly adjacent to the southern and western Project site boundaries. Operational noise sources that would be associated with the proposed Project include mobile and stationary (i.e., truck maneuverings, warehouse operations) sources. (ECORP, 2021b, pp. 29-30)

1. Operational Offsite Traffic Noise

As proposed by the Project Applicant, approximately 25% of the Project's passenger vehicle traffic would utilize the Project's southern entrance from Bolo Court. However, there is a potential that the access at Bolo Court would be restricted to emergency access only, in which case 100% of the Project's passenger vehicle traffic would utilize Street A to access Horsethief Canyon Road. As such, two separate analyses of traffic are provided below. The "Primary Distribution" refers to the Project's proposal to allow 25% of passenger vehicle trips to access the site via Bolo Court, while the "Alternative Distribution" refers to the alternative in which all passenger vehicle traffic uses Street A to access Horsethief Canyon Road.

Existing Plus Project Conditions (Primary Distribution)

Future traffic noise levels throughout the Project vicinity (i.e., vicinity roadway segments that traverse noise sensitive land uses) were modeled based on the traffic volumes identified by the Project's TA (*Technical Appendix L2*) for Existing Plus Project conditions to determine the noise levels along Project vicinity roadways. Table 4.13-10, *Existing Plus Project Conditions Predicted Traffic Noise Levels (Primary Distribution)*, shows the calculated offsite roadway noise levels under existing traffic levels compared to future build-out of the Project. The calculated noise levels as a result of the Project at affected sensitive land uses are compared to the noise standards promulgated by the County of Riverside and significance thresholds recommended by FICON. As shown in Table 4.13-10, no roadway segment would experience an increase of noise beyond the FICON significance standards as a result of the Project. As such, Project traffic-related noise increases would be less than significant under Existing Plus Project conditions. (ECORP, 2021b, pp. 30-31)

Horizon Year (2040) Conditions (Primary Distribution)

Year 2040 cumulative traffic noise levels throughout the Project vicinity (i.e., vicinity roadway segments that traverse noise sensitive land uses) were modeled based on the traffic volumes identified by the Project's TA (*Technical Appendix L2*) to determine the noise levels along Project vicinity roadways under Year 2040 conditions. Table 4.13-11, *Horizon Year (2040) Predicted Traffic Noise Levels (Primary Distribution)*, shows the calculated offsite roadway noise levels under Year 2040 traffic levels without the Project compared to future build-out of the Project in the Year 2040. The calculated noise levels as a result of the Project at affected sensitive land uses are compared to the noise standards promulgated in the County of Riverside and significance thresholds recommended by FICON. As shown in Table 4.13-11, no roadway segment would generate an increase of noise beyond the FICON significance standards in any scenario. Therefore, Project-related traffic noise would be less than significant under Horizon Year (2040) conditions. (ECORP, 2021b, pp. 41-42)



Table 4.13-10 Existing Plus Project Conditions Predicted Traffic Noise Levels (Primary Distribution)

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway		Noise Standard (dBA CNEL)	Exceed Standard AND result in Noise Levels Exceeding Acceptable Exterior Noise Standards
		Existing Conditions	Existing + Project Conditions		
De Palma Road					
North of Indian Truck Trail	Residential & Commercial	58.2	58.9	>5.0	No
South of Indian Truck Trail	Residential & Commercial	62.5	62.6	>3.0	No
Horsethief Canyon Road					
South of De Palm Road	Residential	58.0	59.3	>5.0	No
Hostettler Road					
West of Bolo Court	Residential	49.2	49.8	>5.0	No
East of Bolo Court	Residential	46.1	49.2	>5.0	No
Bolo Court					
South of Hostettler Road	Residential	28.2	28.2	>5.0	No
Lake Street					
South of Temescal Canyon Road	Residential & Industrial	60.5	61.8	>3.0	No

Notes:

1. Traffic noise levels were calculated by ECORP using the FHWA roadway noise prediction model in conjunction with the trip generation rate identified by the Project's TA (*Technical Appendix L2*). Refer to Attachment B to the Project's NIA (*Technical Appendix J1*) for traffic noise modeling assumptions and results.
2. A total of 12 intersections were analyzed in the Project's TA; however, only roadway segments that have the potential to impact sensitive receptors were included for the purposes of analysis. (ECORP, 2021b, Table 10)



Table 4.13-11 Horizon Year (2040) Predicted Traffic Noise Levels (Primary Distribution)

Roadway Segment	Cumulative No Project	Cumulative Plus Project	Noise Standard (dBA CNEL)	Exceed Standard?
	CNEL @ 100 Feet from Roadway Centerline	CNEL @ 100 Feet from Roadway Centerline		
De Palma Road				
North of Indian Truck Trail	63.7	63.8	>3.0	No
South of Indian Truck Trail	65.4	65.5	>1.5	No
Horsethief Canyon Road				
South of De Palm Road	64.6	64.8	>3.0	No
Hostettler Road				
West of Bolo Court	50.6	51.0	>5.0	No
East of Bolo Court	49.9	51.4	>5.0	No
Bolo Court				
South of Hostettler Road	28.2	28.2	>5.0	No
Lake Street				
South of Temescal Canyon Road	65.0	65.1	>1.5	No

Notes:

1. Traffic noise levels were calculated by ECORP using the FHWA roadway noise prediction model in conjunction with the trip generation rate identified by the Project’s TA (*Technical Appendix L2*). Refer to Attachment B to the Project’s NIA (*Technical Appendix J1*) for traffic noise modeling assumptions and results.
2. A total of 12 intersections were analyzed in the Project’s TA; however, only roadway segments that have the potential to impact sensitive receptors were included for the purposes of analysis. (ECORP, 2021b, Table 15)

Existing Plus Project Conditions (Alternative Distribution)

For the Alternative Distribution in which passenger vehicle access is limited to the intersection of Street A and Horsethief Canyon Road, future traffic noise levels throughout the Project vicinity (i.e., vicinity roadway segments that traverse noise sensitive land uses) were modeled based on the traffic volumes identified by the Project’s Focused Traffic Assessment (“Focused TA”; *Technical Appendix L4*) for Existing Plus Project conditions to determine the noise levels along Project vicinity roadways. As shown in Table 4.13-12, *Existing Plus Project Conditions Predicted Traffic Noise Levels (Alternative Distribution)*, in the event that all passenger vehicle traffic is restricted to the intersection of Street A and Horsethief Canyon Road, no roadway segment would experience an increase of noise beyond the FICON significance standards as a result of the Project. As such, Project traffic-related noise increases would be less than significant under Existing Plus Project conditions with implementation of the Alternative Distribution scenario. (ECORP, 2022, p. 3)



Table 4.13-12 Existing Plus Project Conditions Predicted Traffic Noise Levels (Alternative Distribution)

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway		Noise Standard (dBA CNEL)	Exceed Standard AND result in Noise Levels Exceeding Acceptable Exterior Noise Standards
		Existing Conditions	Existing + Project Conditions		
De Palma Road					
Between Horsethief Canyon Road & Indian Truck Trail	Residential & Commercial	62.5	64.0	>3.0	No
North of Indian Truck Trail	Residential & Commercial	58.3	62.5	>5.0	No
Horsethief Canyon Road					
South of De Palma Road	Residential	58.9	62.9	>5.0	No

Notes:

1. Traffic noise levels were calculated by ECORP Consulting using the FHWA roadway noise prediction model in conjunction with the trip generation rate identified by the Project’s Focused TA (*Technical Appendix LA*). Refer to the Project’s Focused NIA (*Technical Appendix JI*) for traffic noise modeling assumptions and results.
2. A total of 3 intersections were analyzed in the Focused TA; however, only roadway segments that impact sensitive receptors were included for the purposes of this analysis. (ECORP, 2022, Table 1)

Horizon Year (2040) Conditions (Alternative Distribution)

For the Alternative Distribution in which passenger vehicle access is limited to the intersection of Street A and Horsethief Canyon Road, future traffic noise levels throughout the Project vicinity (i.e., vicinity roadway segments that traverse noise sensitive land uses) were modeled based on the traffic volumes identified by the Project’s Focused TA (*Technical Appendix LA*) to determine the noise levels along Project vicinity roadways under Horizon Year 2040 conditions. As shown in Table 4.13-13, *Horizon Year (2040) Predicted Traffic Noise Levels (Alternative Distribution)*, in the event that all passenger vehicle traffic is restricted to the intersection of Street A and Horsethief Canyon Road, no roadway segment would experience an increase of noise beyond the FICON significance standards as a result of the Project. As such, Project traffic-related noise increases would be less than significant under Horizon Year 2040 conditions with implementation of the Alternative Distribution scenario. (ECORP, 2022, pp. 3-4)

2. Operational Onsite Stationary Noise

The primary onsite operational noise associated with the proposed Project would be warehouse-related activity, such as trucks idling and maneuvering the site. The County of Riverside’s regulations are contained in the Noise Element of the County’s General Plan and Riverside County Ordinance No. 847. The maximum exterior noise standards for residential uses pursuant to Ordinance No. 847 are as follows: (ECORP, 2021b, p. 31)



Table 4.13-13 Horizon Year (2040) Predicted Traffic Noise Levels (Alternative Distribution)

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway		Noise Standard (dBA CNEL)	Exceed Standard AND result in Noise Levels Exceeding Acceptable Exterior Noise Standards
		Existing Conditions	Existing + Project Conditions		
De Palma Road					
Between Horsethief Canyon Road & Indian Truck Trail	Residential & Commercial	65.4	66.8	>1.5	No
North of Indian Truck Trail	Residential & Commercial	63.7	66.6	>3.0	No
Horsethief Canyon Road					
South of De Palma Road	Residential	64.2	64.5	>3.0	No

Notes:

1. Traffic noise levels were calculated by ECORP Consulting using the FHWA roadway noise prediction model in conjunction with the trip generation rate identified by the Project’s Focused TA (*Technical Appendix L4*). Refer to the Project’s Focused NIA (*Technical Appendix J1*) for traffic noise modeling assumptions and results.

2. A total of 3 intersections were analyzed in the Focused TA; however, only roadway segments that impact sensitive receptors were included for the purposes of this analysis.

(ECORP, 2022, Table 2)

- 55 dBA Leq from 7:00 a.m. to 10: 00 p.m. (daytime)
- 45 dBA Leq from 10:00 p.m. to 7:00 a.m. (nighttime)

Stationary source noise levels have been calculated with the SoundPLAN 3D noise model, which predicts noise propagation based on the location, noise level, and frequency spectra of the noise sources as well as the geometry and reflective properties of the local terrain, buildings and barriers. The proposed Project evaluated herein consists of a proposed General Plan Amendment, Zone Change, and the first amendment to the Renaissance Ranch Specific Plan No. 333. No site-specific development plans have been identified for the currently-proposed Project, and details such as building size, orientation, and location of truck loading docks would be determined as part of future implementing projects (i.e., plot plans, conditional use permits, etc.). As such, a worst-case analysis was performed, placing noise producing sources such as loading docks and the internal circulation network as close to existing sensitive receptors as permitted. Below each land use is described and its stationary noise sources are discussed.

- **Light Industrial.** Light Industrial uses are proposed in Planning Area 2 of proposed SP 333A1. Light industrial uses typically attract both passenger car and trailer-truck traffic by accommodating uses such as industrial incubators, light manufacturing, parcel hub, warehouse/storage, fulfillment center, and e-commerce operations. The light industrial land uses, which account for a majority of the Project site, would be the primary operational noise source associated with the proposed Project. These stationary source noises would mainly be attributed to warehouse-related activity, such as trucks idling and



maneuvering the site. To represent this in SoundPLAN, an area source measuring 33 feet by 33 feet (10 meters by 10 meters) every 100 feet (30 meters) with a sound power of 79.0 dBA representing potential truck loading dock noise is placed on the perimeter of the Project site closest to existing noise sensitive land uses. 79.0 dBA represents the loudest function of heavy-duty truck maneuvering (backup beepers). (ECORP, 2021b, p. 32)

- **Business Park.** Business Park uses are proposed in Planning Area 1 of proposed SP 333A1 and primarily would allow for small-scale light industrial, incubator industrial, merchant wholesalers, professional services, hospitality, professional office, small-scale warehousing/storage, and research and development uses. Similar to the light industrial uses, the main operation noise would be attributed to warehouse activity. 79.0 dBA represents the loudest function of heavy-duty truck maneuvering (backup beepers). These noise sources were placed on the perimeter of the Project site for the purposes of Project onsite noise modeling. Additionally, area sources of the same size were added along the northern boundary adjacent to I-15. (ECORP, 2021b, p. 32)

Noise generated by internal circulation on internal Project site roadways, such as Street A, was calculated by SoundPLAN based on reference sound power values generated by the FHWA Highway Noise Prediction Model. Modeling parameters were adjusted to reflect the anticipated amount of medium-duty and heavy-duty trucks generated by the Project, as evaluated in the Project's TA (*Technical Appendix L2*), since these vehicles produce more noise than passenger vehicles. A line source with a noise level of 65.3 dBA was used in SoundPLAN to predict noise propagation specific to internal circulation on the Project site. (ECORP, 2021b, p. 32)

- **Open Space.** Open Space-Conservation uses are proposed in Planning Areas 3 and 4 of SP 333A1, and are located along the western and southern boundaries of the Project site to provide a landscape buffer between the Light Industrial land uses within proposed Planning Area 2 and the existing offsite residential neighborhood to the west and south. This buffer would provide landscaping, manufactured slopes, physical and visual buffering, and screening. Due to the lack of specific information pertaining to the buffer, it was not accounted for in the SoundPLAN noise model, in order to provide a conservative estimation of Project-related operational noise impacts. Open Space-Conservation Habitat land uses are proposed in Planning Areas 5 and 6 of proposed SP 333A1. These areas are intended to be preserved as natural open space and would have no operational noise associated with them as a result of Project operations. (ECORP, 2021b, pp. 32-33)

All future operations on the Project site would be required to adhere to the best management practices established in the County of Riverside Board of Supervisors Good Neighbor Policy for Logistics and Warehouse/Distribution Uses (Riverside County Board of Supervisors Policy F-3). For instance, as modeled in SoundPLAN, warehouse/distribution facilities would be generally designed so that truck bays and loading docks are a minimum of 300 feet away from the property line of sensitive receptors, measured from the dock building door, unless noise-reducing berms or other similar features were implemented to appropriately shield and buffer the sensitive receptors from the active truck operations areas. Dock doors must be located where they are not readily visible from sensitive receptors or major roads. An additional "wing-wall" must be installed



perpendicular to the loading dock areas to further attenuate noise related to truck activities when adjacent to sensitive receptors. (ECORP, 2021b, p. 33; Riverside County, 2019c)

Additionally, proposed SP 333A1 contains planning standards to ensure that development of the light industrial, business park, and open space areas are consistent with the quality and vision of Riverside County, and to ensure that the design of the Project accommodates the surrounding offsite land uses. For instance, proposed SP 333A1 mandates that all future loading docks and truck parking areas must be visually screened from the adjacent residential homes to the west and south, I-15 Freeway, Horsethief Canyon Road, and Bolo Court by any combination of walls, landscaping, and/or other screening features or barriers (such as berms). Outdoor loading and storage areas and loading doors must be screened from view public streets and/or the adjacent residential homes to the west and south by concrete or masonry walls, tubular steel fencing, and/or landscaping. Such walls, fencing, and/or landscaping used as screening must be a minimum eight feet in height and must be of sufficient height to screen all equipment, tractors, trailers, and loading doors from view. Further, all manufacturing and processing activities must be conducted within a wholly enclosed building. (ECORP, 2021b, p. 33)

As previously stated, SoundPLAN was used to model operational noise on a worst-case basis and no future noise-reducing barriers were accounted due to the fact that no site-specific development plans (i.e., plot plans, conditional use permits, etc.) are proposed as part of the current Project. Therefore, all noise producing sources were placed as close to existing and future sensitive receptors as possible, accounting for the 300-foot buffer required by the best management practices established in the County of Riverside Board of Supervisors Good Neighbor Policy for Logistics and Warehouse/Distribution Uses, as well as the 75 feet of open space-conservation land proposed to the south and west of Planning Area 2 of proposed SP 333A1. While the orientation of the buildings is currently unknown, noise could further be reduced by intervening structures (i.e. buildings or structures between noise producing sources and sensitive receptors). Generally, a single row of detached buildings between the receptor and the noise source reduces the noise level by about five dBA. Additionally, as required by proposed SP 333A1, there shall be no loading docks on the building facades facing Street A, Bolo Court, or the adjacent residential homes to the west and south. Proposed SP 333A1 also mandates that outdoor loading doors, service docks, and equipment areas should be oriented or screened to reduce visibility from public roads and publicly accessible locations. The Good Neighbor Policy for Logistics and Warehouse/Distribution Uses requires an additional “wing-wall” be installed perpendicular to the loading dock areas to further attenuate noise related to truck activities when adjacent to sensitive receptors. As previously mentioned, a solid wall or berm generally reduces noise levels by 10 to 20 dBA (FHWA 2011). However, the noise reduction provided by the required wing-walls would only occur during the final maneuvers of the delivery truck. (ECORP, 2021b, pp. 33-34; Riverside County, 2019c)

Noise propagation from onsite Project operations, as calculated using the SoundPLAN 3D noise model, is shown in Table 4.13-14, *Modeled Operational Noise Levels*, which identifies the predicted Project noise levels at eleven locations in the Project vicinity. Two of these locations (Site Locations 3 & 7) are where the existing baseline noise measurements were taken (see Table 4.13-3), while the additional nine locations are located



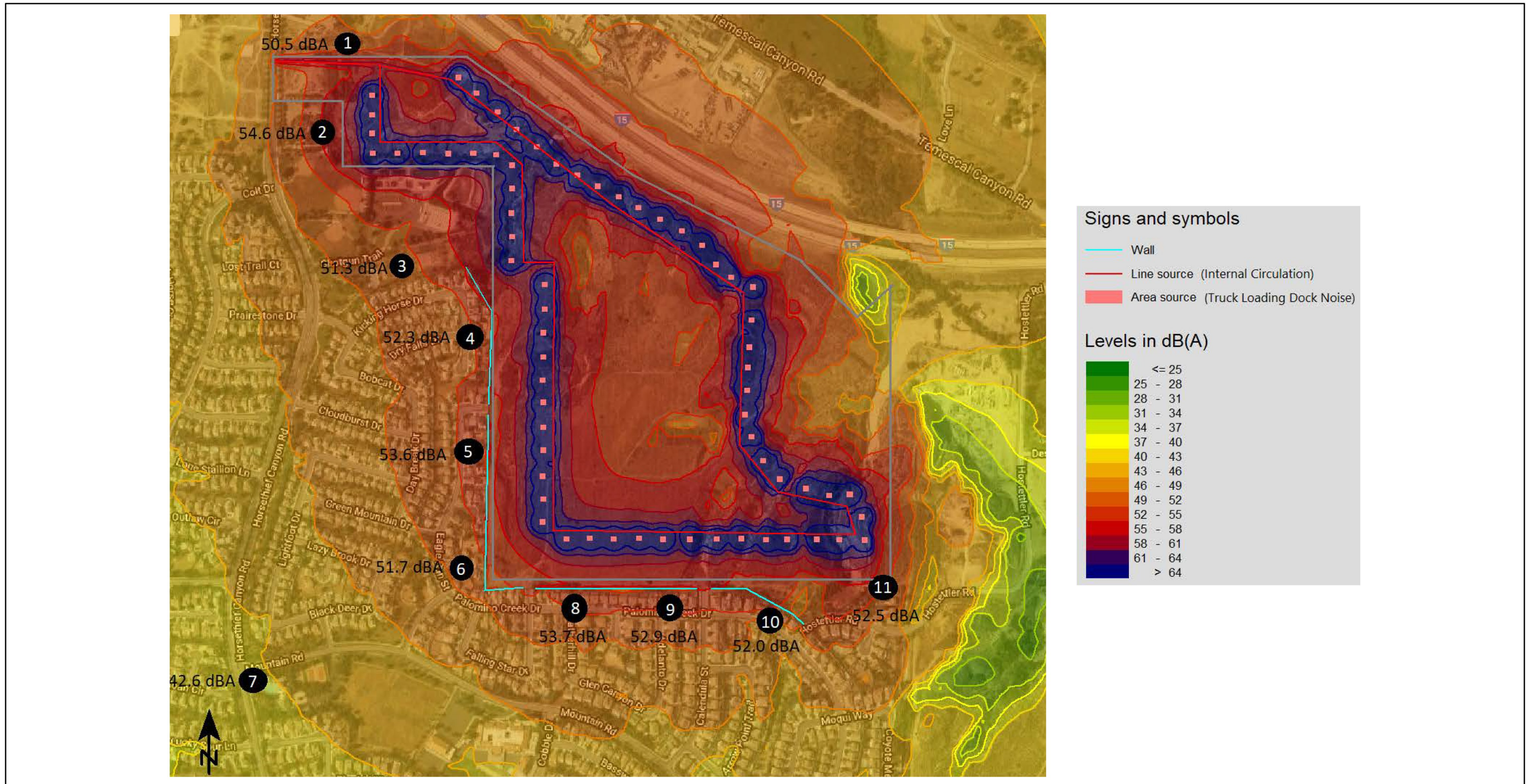
Table 4.13-14 Modeled Operational Noise Levels

Site Location	Location	Existing Baseline Noise Measurements (Leq dBA)	Modeled Operational Noise Attributable to Project (Leq dBA)	County Exterior Standards (dBA) (Day/Night)	Exceed Standard? (Day /Night)
1	North of Project site adjacent to rural residence	--	50.5	55 / 45	No / Yes
2	North of Project site adjacent to rural residence	--	54.6	55 / 45	No / Yes
3	Tucked in shrubs north of the Horsethief Canyon Dog Park and south of Shotgun Trail	53.8	51.3	55 / 45	No / Yes
4	West of Project site adjacent to residences located in the Horsethief Canyon Ranch Community	--	52.3	55 / 45	No / Yes
5	West of Project site adjacent to residences located in the Horsethief Canyon Ranch Community	--	53.6	55 / 45	No / Yes
6	West of Project site adjacent to residences located in the Horsethief Canyon Ranch Community	--	51.7	55 / 45	No / Yes
7	Tucked in shrubs north of the Horsethief Canyon Recreation Center and south of Mountain Road	58.8	42.6	55 / 45	No / No
8	South of Project site adjacent to residences located in the Horsethief Canyon Ranch Community	--	53.7	55 / 45	No / Yes
9	South of Project site adjacent to residences located in the Horsethief Canyon Ranch Community	--	52.9	55 / 45	No / Yes
10	South of Project site adjacent to residences located in the Horsethief Canyon Ranch Community	--	52.0	55 / 45	No / Yes
11	South of Project site adjacent to residences located in the Horsethief Canyon Ranch Community	--	52.2	55 / 45	No / Yes

Notes:

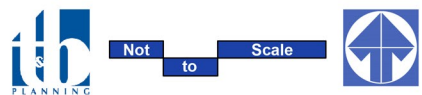
1. Stationary source noise levels were modeled by ECORP using SoundPLAN 3D noise model. Refer to Attachment D to the Project's NIA (*Technical Appendix J1*) for noise modeling assumptions and results.
2. Source noise measurements identify 79.0 dBA for heavy-duty truck maneuvering per the San Jose Loading Dock Noise Study (2014) and 65.3 dBA for internal circulation as calculated by the FHWA Highway Noise Prediction Model. These reference measurements informed the SoundPLAN model to predict Project noise propagation. See Attachment D to the Project's NIA. (ECORP, 2021b, Table 11)

along the northern, southern, and western boundaries of the Project site, adjacent to nearby residential land uses. Additionally, and as shown on Figure 4.13-2, *Project Onsite Source Noise Generation*, a noise contour graphic has been prepared to depict the predicted noise levels in the Project vicinity as a result of onsite Project operations. (ECORP, 2021b, p. 34)



Source(s): ECORP Consulting (02-24-2021)

Figure 4.13-2



Project Onsite Source Noise Generation



As shown in Table 4.13-14 and Figure 4.13-2, the Project would not surpass the daytime noise standard (55 dBA Leq) at any nearby sensitive receptors; thus, daytime operational noise associated with the proposed Project would be less than significant. However, in the case that the Project operates any time from 10:00 p.m. to 7:00 a.m. (nighttime), operations would potentially exceed the County nighttime noise standard (45 dBA Leq) at all noise sensitive receptors located directly adjacent to the western and southern Project site boundaries, and along the north side of Planning Area 1 of proposed SP 333A1. As previously stated, the Project was modeled using a worst-case analysis since a detailed site plan is not available and the hours of operations are unknown at this time. Notwithstanding, the Project's potential to expose nearby residential receptors to nighttime noise levels exceeding 45 dBA Leq represents a potentially significant impact for which mitigation would be required. (ECORP, 2021b, p. 37)

Threshold d.: Would the Project result in the generation of excessive ground-borne vibration or ground-borne noise levels?

The Project has the potential to result in excessive ground-borne vibration or ground-borne noise levels during both construction and long-term operation. Each is discussed below.

A. *Construction-Related Vibration Impacts*

Excessive groundborne vibration impacts result from continuously occurring vibration levels. Increases in groundborne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Construction on the Project site would have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. (ECORP, 2021b, p. 37)

Construction-related ground vibration is normally associated with impact equipment such as pile drivers, jackhammers, and the operation of some heavy-duty construction equipment, such as dozers and trucks. It is noted that pile drivers would not be necessary during Project construction. Vibration decreases rapidly with distance and it is acknowledged that construction activities would occur throughout the Project site and would not be concentrated at the point closest to sensitive receptors. Groundborne vibration levels associated with construction equipment are summarized in Table 4.13-15, *Representative Vibration Source Levels for Construction Equipment*. (ECORP, 2021b, p. 38)

The County does not regulate vibrations associated with construction. However, a discussion of construction vibration is included for full disclosure purposes. For comparison purposes, the County of Riverside standard of 0.01 inch per second RMS for assessing groundborne vibration from rail-related activities, promulgated by County General Plan Policy N 16.3, is used as a threshold. As identified in Table 4.13-15, this level of ground vibration equates to the range of human perception and is unlikely to cause damage to any type of building. (ECORP, 2021b, p. 38)



Table 4.13-15 Representative Vibration Source Levels for Construction Equipment

Equipment Type	Peak Particle Velocity at 25 Feet (inches per second)
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Trucks	0.076
Hoe Ram	0.089
Jackhammer	0.035
Small Bulldozer/Tractor	0.003
Vibratory Roller	0.210

(ECORP, 2021b, Table 12)

1. Onsite Construction Vibration Impacts

The nearest land use of concern to onsite construction on the Project site are the rural residences located on Horsethief Canyon Road, adjacent to Planning Area 1 of proposed SP 333A1. Based on the representative vibration levels presented for various construction equipment types in Table 4.13-15 and the construction vibration assessment methodology published by the FTA, it is possible to estimate the potential Project construction vibration levels. Consistent with FTA recommendations for calculating construction vibration, construction vibration was measured from the center of proposed Planning Area 1. Table 4.13-16, *Onsite Construction Vibration Levels at 200 Feet*, presents the expected Project related vibration levels at a distance of 200 feet. As shown in Table 4.13-16, vibration as a result of onsite construction activities on the Project site would not exceed 0.01 inch per second RMS at the nearest sensitive receptor. Thus, Project construction-related vibration levels affecting nearby sensitive receptors would be less than significant. (ECORP, 2021b, pp. 38-39)

Table 4.13-16 Onsite Construction Vibration Levels at 200 Feet

Receiver PPV Levels (in/sec) ¹					Peak Vibration	RMS Velocity Levels ²	Threshold	Exceed Threshold
Large Bulldozer, Caisson Drilling, & Hoe Ram	Loaded Trucks	Jackhammer	Small Bulldozer	Vibratory Roller				
0.0039	0.0033	0.0015	0.0001	0.0092	0.0092	0.0064	0.01	No

1. Based on the Vibration Source Levels of Construction Equipment included on Table 4.13-15.

2. Vibration levels in PPV are converted to RMS velocity using a 0.70 conversion factor identified by Caltrans.

(ECORP, 2021b, Table 13)



2. Offsite Construction Vibration Impacts

The nearest structure of concern to offsite construction activity is a residence located on Horsethief Canyon Road, approximately 25 feet distant from proposed construction activities. Based on the representative vibration levels presented for various construction equipment types in Table 4.13-15 and the construction vibration assessment methodology published by the FTA, offsite Project construction vibration levels have been calculated and are presented in Table 4.13-17, *Offsite Construction Vibration Levels at 25 Feet*. Based on the Project vibration levels presented in Table 4.13-17, ground vibration generated by heavy-duty equipment would be anticipated to exceed the 0.01 inch per second PPV RMS threshold at 25 feet. Thus, the residence located along Horsethief Canyon Road would be exposed to construction-related vibration levels that exceed the thresholds of significance identified herein. Thus, offsite construction-related vibration impacts would be significant prior to mitigation. (ECORP, 2021b, p. 39)

Table 4.13-17 Offsite Construction Vibration Levels at 25 Feet

Receiver PPV Levels (in/sec) ¹					Peak Vibration	RMS Velocity Levels ²	Threshold	Exceed Threshold
Large Bulldozer, Caisson Drilling, & Hoe Ram	Loaded Trucks	Jackhammer	Small Bulldozer	Vibratory Roller				
0.089	0.076	0.035	0.003	0.210	0.210	0.147	0.01	Yes

1. Based on the Vibration Source Levels of Construction Equipment included on Table 4.13-15.
2. Vibration levels in PPV are converted to RMS velocity using a 0.70 conversion factor identified by Caltrans. (ECORP, 2021b, Table 14)

B. Operational-Related Vibration Impacts

Project operations would not include the use of any stationary equipment that would result in excessive vibration levels. While the Project would accommodate heavy-duty trucks, these vehicles can only generate groundborne vibration velocity levels of 0.006 PPV at 50 feet under typical circumstances. Therefore, the Project would result in negligible groundborne vibration impacts during long-term operations, and impacts would be less than significant. (ECORP, 2021b, p. 40)

4.13.5 CUMULATIVE IMPACT ANALYSIS

The cumulative study area for the issue of noise includes the Project vicinity as well as areas adjacent to roadways evaluated by the Project’s TA (*Technical Appendix L2*). Areas outside of the cumulative study area are too far away to be adversely impacted by noise and ground-borne vibration generated as a result of the proposed Project.

As indicated under the analysis of Threshold a. and b., the Project site is located outside of areas that would be subject to airport-related noise in excess of 55 dBA. There are no components of the proposed Project that



would cause or contribute to increased airport-related noise in the area. As such, impacts would be less-than-cumulatively considerable.

Construction activities associated with the proposed Project and other construction projects in the area may overlap, resulting in construction noise in the area. However, construction noise impacts primarily affect the areas immediately adjacent to the construction site. Cumulative development in the vicinity of the Project site could result in elevated construction noise levels at sensitive receptors in the Project area. Based on the list of cumulative developments identified by the Project's TA (*Technical Appendix L2*), as previously depicted on EIR Figure 4.0-1 and summarized in EIR Table 4.0-1, there is only one known cumulative development within close proximity to the Project site that could be under construction simultaneous with Project construction activities. This cumulative project consists of a proposed residential development located immediately west of the Project site, on the west side of Horsethief Canyon Road and south of and abutting I-15. As previously indicated in Table 4.13-8, the Project's peak construction noise levels onsite would be 71.5 dBA at the nearest sensitive receptors. Even when combined with construction noise associated with the cumulative development to the west of the Project site, the total noise levels affecting nearby sensitive receptors would not exceed 85 dBA Leq. Thus, cumulatively-considerable onsite construction noise impacts would be less than significant.

However, as previously shown in Table 4.13-9, Project-related offsite construction activities during the construction of the planned offsite water line would expose the nearest sensitive receptor to noise levels up to 92.2 dBA, which would exceed the identified threshold of significance of 85 dBA Leq. The planned offsite improvements would occur in close proximity to the cumulative development project located west of the Project site. As such, there is a potential that Project-related offsite construction noise could combine with construction noise from the nearest cumulative development, thereby exposing sensitive receptors to noise levels exceeding 92.2 dBA. This is evaluated as a significant impact on a cumulatively-considerable basis.

With respect to operational traffic-related noise, Table 4.13-11 (previously presented) shows the predicted traffic noise levels under Horizon Year (2040) conditions with the addition of traffic from the Project and other cumulative developments. As shown in Table 4.13-11, no roadway segment would generate an increase of noise beyond the FICON significance standards in any scenario. Thus, Project operational-related traffic noise impacts would be less than significant on a cumulatively-considerable basis.

As previously shown in Table 4.13-14 and as previously depicted on Figure 4.13-2, although the Project would not surpass the daytime noise standard at any nearby sensitive receptors, Project nighttime operations would exceed the County nighttime noise standard at all noise sensitive receptors located directly adjacent to the western and southern Project site boundaries, and along the north side of Planning Area 1 of proposed SP 333A1. However, based on the list of cumulative developments previously shown on EIR Figure 4.0-1 and summarized in EIR Table 4.0-1, the only cumulative development within the Project's immediate vicinity consists of a proposed residential development to the west of Horsethief Canyon Road and south of and adjacent to I-15. Additionally, land uses surrounding the Project site primarily consist of residential developments. Residential developments are not associated with high levels of operational noise, and thus would not cumulatively contribute to the Project's anticipated operational noise effects. Accordingly, although



the Project would result in a significant direct impact due to nighttime operational noise, Project operational noise impacts would be less than significant on a cumulatively-considerable basis.

As previously shown in Table 4.13-16, Project-related onsite construction vibration levels would be approximately 0.0064 inch per second PPV RMS, which would be far below the identified threshold of significance of 0.01. Additionally, and as noted above for construction noise, there is only one known cumulative development within close proximity to the Project site that could be under construction simultaneous with Project construction activities. This cumulative project consists of a proposed residential development located immediately west of the Project site, on the west side of Horsethief Canyon Road and south of and abutting I-15. Due to the distance between anticipated onsite construction activities and the nearest cumulative development, it is unlikely that Project construction-related vibration levels would combine with vibration levels from cumulative developments such that the threshold of significance would be exceeded at the nearby sensitive receptors. As such, Project-related vibration impacts associated with onsite construction activities would be less than significant on a cumulatively-considerable basis.

However, and as previously shown in Table 4.13-17, during construction of the planned offsite water line, Project construction activities would expose the nearest sensitive receptor to vibration levels up to 0.147 inch per second PPV RMS, which would exceed the identified threshold of significance of 0.01. The planned offsite improvements would occur in close proximity to the cumulative development project located west of the Project site. As such, there is a potential that Project-related offsite construction vibration could combine with construction vibration from the nearest cumulative development, thereby exposing sensitive receptors to vibration levels exceeding 0.147 inch per second PPV RMS. This is evaluated as a significant impact on a cumulatively-considerable basis.

With respect to operational vibration-related impacts, the Project would not result in vibration levels exceeding 0.006 PPV at a distance of 50 feet, and would not exceed the identified threshold of significance. Areas surrounding the Project site primarily consist of existing and planned residential developments, and there are no uses surrounding the Project site capable of producing substantial amounts of operational-related vibration. As such, Project operational vibration impacts would be less than significant on a cumulatively-considerable basis.

4.13.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Thresholds a. and b.: Less-than-Significant Impact. The Project does not involve an airport-related component, and would not create or exacerbate aircraft-related noise in the local area. The Project site also occurs outside of the 55 dBA CNEL contours for the Corona Municipal Airport, and would not be exposed to substantial airport-related noise associated with Skylark Field. As such, the Project would not expose people residing or working in the Project area to excessive airport-related noise levels, and impacts would be less than significant.

Threshold c.: Direct and Cumulatively-Considerable Impact. During onsite construction activities no individual or cumulative piece of construction equipment would exceed the NIOSH threshold of 85 dBA Leq at the nearest potential receptors to onsite construction. However, during construction of the offsite water line,



the Project would expose nearby sensitive receptors to noise levels up to 92.2 dBA Leq, which would exceed the identified threshold of significance of 85.0 dBA Leq. Because the offsite roadway improvements would occur in close proximity to a planned development located west of the Project site, Project-related construction noise associated with construction of the offsite water line would be significant on both a direct and cumulatively-considerable basis.

With respect to operational noise, Project-related traffic would not result in significant noise level increases along any study area roadway segment under either Existing Plus Project or Horizon Year (2040) conditions under both the Primary Distribution and Alternative Distribution scenarios; thus, Project-related traffic noise impacts would be less than significant. Although onsite operational noise levels during the daytime would not expose nearby sensitive receptors to noise levels exceeding the identified threshold of significance of 55 dBA Leq, Project nighttime operational activities has the potential to expose nearby sensitive receptors to noise levels exceeding the identified threshold of significance of 45 dBA Leq. Thus, the Project's potential to expose nearby residential receptors to nighttime noise levels exceeding 45 dBA Leq represents a potentially significant direct impact for which mitigation would be required. However, due to the predominately residential nature of areas surrounding the Project site, Project operational noise impacts during the nighttime would be less than significant on a cumulatively-considerable basis.

Threshold d.: Direct and Cumulatively-Considerable Impact. Project-related construction activities onsite would not expose nearby sensitive receptors to vibration levels exceeding 0.01 inch per second RMS on either a direct or cumulatively-considerable basis. Likewise, under long-term operational conditions, the Project would not expose nearby sensitive receptors to vibration levels exceeding 0.006 PPV. However, during the construction of the offsite water line, the Project would expose the nearest sensitive receptor to vibration levels up to 0.147 inch per second RMS, which would exceed the identified threshold of significance of 0.01 inch per second RMS. As planned offsite construction activities have the potential to occur in close proximity to vibration levels from the nearest cumulative development, Project vibration impacts during the construction of the offsite water line would be significant on both a direct and cumulatively-considerable basis.

4.13.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- All construction activities and haul truck deliveries shall adhere to Section 2.i of Riverside County Ordinance No. 847, which prohibits construction activities that make loud noise from occurring between 6:00 p.m. and 6:00 a.m. during the months of June through September, and between 6:00 p.m. and 7:00 a.m. during the months of October through May, and on Sundays and Federal holidays.



- Construction and operation of logistics and/or warehouse/distribution uses on site for buildings that exceed 250,000 s.f. in size shall be subject to compliance with the Riverside County Board of Supervisors' Policy F-3 ("Good Neighbor Policy" for Logistics and Warehouse/Distribution Uses).

Mitigation

MM 4.13-1 Prior to issuance of grading permits or improvement plans for the construction of the off-site water line within Horsethief Canyon Road, and in order to reduce construction noise during its installation, the Riverside County Building and Safety Department shall review to ensure that the following note is included on the plans:

"During the construction of the proposed water main within Horsethief Canyon Road and associated paving and painting phases, a temporary noise barrier or enclosure shall be positioned between the proposed offsite construction activities and the neighboring residence to the east in a manner that breaks the line of sight between the construction equipment and the residence. The temporary noise barrier shall have a sound transmission class (STC) of 10 or greater in accordance with American Society for Testing and Materials Test Method E90, or at least 2 pounds per square foot to ensure adequate transmission loss characteristics. The temporary noise barrier can consist of a solid plywood fence at least 7/16-inch in thickness and/or flexible sound curtains, such as an 18-ounce tarp or a 2-inchthick fiberglass blanket, attached to chain link fencing. The length, height, and location of the temporary noise barrier shall completely break the line of sight between the construction site and the residences to the east, must be free of degrading holes or gaps, and must not be flanked by nearby reflective surfaces. All noise control barrier walls shall be designed to preclude structural failure due to such factors as winds, shear, shallow soil failure, earthquakes, and erosion."

The Project construction contractor shall be responsible for enforcing this requirement, which also shall be specified in bid documents issued to prospective construction contractors. The Project construction contractor shall permit inspections by Riverside County to verify compliance with this measure.

MM 4.13-2 Prior to issuance of grading permits or improvement plans for the construction of the off-site water main within the existing alignment of Horsethief Canyon Road, the Riverside County Building and Safety Department shall review the improvement plans to ensure that a note is included prohibiting the use of drilling equipment, large bulldozers, or loaded heavy duty trucks within 25 feet of any existing structure. The Project construction contractor shall be responsible for enforcing this requirement, which also shall be specified in bid documents issued to prospective construction contractors. The Project construction contractor shall permit inspections by Riverside County to verify compliance with this measure.



MM 4.13-3 Prior to approval of future implementing development applications (i.e., plot plans, conditional use permits, etc.) for proposed light industrial or business park uses within Planning Areas 1 or 2 of Specific Plan No. 333, Amendment No. 1, the Project Applicant shall prepare and Riverside County shall review and approve a site-specific noise impact analysis. The analysis shall evaluate the proposed application materials to determine whether future operations on-site would expose nearby sensitive receptors (i.e., residential uses) to noise levels exceeding the County's residential standard of 55 dBA Leq during daytime hours (i.e., between 7:00 a.m. and 10:00 p.m.) and 45 dBA Leq during nighttime hours (i.e., between 10:00 p.m. and 7:00 a.m.). If significant operational-related noise impacts are anticipated, the County shall ensure that the noise impact analysis identifies and that the implementing developments incorporate any noise attenuation measures that may be necessary to reduce operational-related noise impacts affecting off-site residential uses to below the County's residential standard during both daytime and nighttime hours (i.e., 55 dBA Leq and 45 dBA Leq, respectively). Noise attenuation measures may include, but are not necessarily limited to, the incorporation of screen walls or other barriers (such as berms). Prior to issuance of building permits, the Riverside County Building and Safety Department shall ensure that any required noise attenuation measures have been incorporated into the plans, and shall verify that the noise attenuation measures have been implemented prior to final building inspection.

4.13.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold c.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.13-1 would ensure that appropriate measures are taken during the construction of the offsite water line within Horsethief Canyon Road to ensure that nearby sensitive receptors are not exposed to construction-related noise levels exceeding 85 dBA Leq. The required mitigation would ensure that appropriate noise barriers are constructed to shield nearby residential uses from construction noise, which can provide a sound reduction 35 dBA or greater. With implementation of the required mitigation, construction-related noise levels affecting nearby sensitive receptors would be reduced to 57.2 dBA (92.2 dBA - 35 dBA = 57.2 dBA). Therefore, with implementation of the required mitigation, Project-related construction noise impacts during construction of the off-site water line would be reduced to less-than-significant levels on both a direct and cumulatively-considerable basis. (ECORP, 2021b, p. 29)

Implementation of Mitigation Measure MM 4.13-3 would ensure that site-specific noise impact analyses are prepared in conjunction with future implementing developments (i.e., plot plans, conditional use permits, etc.) for light industrial and business park uses within SP 333A1 Planning Areas 1 and 2. The required noise impact analyses would evaluate site-specific development components based on the implementing project application materials, and would identify measures, such as screen walls or other barriers (such as berms), to preclude significant operational-related noise impacts affecting residential uses in the surrounding area. With implementation of the required mitigation, Project impacts due to operational noise increases affecting residential sensitive receptors would be reduced to less-than-significant levels on both a direct and cumulatively-considerable basis.



Threshold d.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.13-2 would prohibit drilling equipment, large bulldozers, and loaded heavy duty trucks from operating within 25 feet of any existing structure during the construction of the proposed offsite water main within Horsethief Canyon Road. Implementation of the required mitigation would reduce Project vibration-related impacts along this roadway segment to below the County's threshold of 0.01 inches/second RMS, and would reduce Project impacts to less-than-significant levels on both a direct and cumulatively-considerable basis. (ECORP, 2021b, p. 40)



4.14 PALEONTOLOGICAL RESOURCES

The analysis in this Subsection is based in part on a Project-specific technical study entitled, “Paleontological Resource Impact Monitoring Program for the Renaissance Ranch Project” (herein, “PRIMP”), prepared by Brian F. Smith and Associates (“BFSA”), dated February 5, 2021, and appended to this EIR as *Technical Appendix K* (BFSA, 2021b).

4.14.1 EXISTING CONDITIONS

A. Geology

Regionally, the Project site lies on the western edge of the Perris Block, a structural block bounded on the west by the Elsinore fault zone and on the east by the San Jacinto fault zone. The Project site is located within Temescal Valley, the erosional expression of the path of the tectonically active Elsinore fault zone. Within the fault zone in the vicinity of the project are various deposits of Quaternary-aged (<1.8 million years) surficial alluvial deposits bordered by much older outcrops of several Mesozoic rock units to the northeast and southwest that compose the local mountains. Also present within the fault zone and near the Project site are discontinuous outcrops of Mesozoic metasediments and volcanics, and the Paleocene-aged Silverado Formation. (BFSA, 2021b, p. 3)

The majority of the Project site is situated over Quaternary very old (middle to early Pleistocene) alluvial-fan deposits, composed of moderately to well consolidated silt, sand, gravel, and conglomerate. Also present at the northwest corner of the project are Quaternary (Holocene and late Pleistocene) young sandy alluvial-fan deposits, while Quaternary (Holocene and late Pleistocene) young sandy wash deposits are present in drainage channels at the eastern edge of the Project site. (BFSA, 2021b, p. 3)

B. Paleontological Resources

1. Definition

Paleontological resources are the remains of prehistoric life that have been preserved in geologic strata. These remains are called fossils and include bones, shells, teeth, and plant remains (including their impressions, casts, and molds) in the sedimentary matrix, as well as trace fossils such as footprints and burrows. Fossils are considered older than 5,000 years of age, but may include younger remains (subfossils) when viewed in the context of local extinction of the organism or habitat, for example. Fossils are considered a nonrenewable resource under State and County guidelines. (BFSA, 2021b, p. 4)

2. Professional Standards

The Society of Vertebrate Paleontology drafted guidelines outlining procedures that include (BFSA, 2021b, p. 4):

“[E]valuating the potential for impacts of a proposed action on paleontological resources and for those impacts. Impact mitigation includes pre-project survey and salvage, monitoring and screen washing during excavation to salvage fossils, conservation and inventory, and final reports and



specimen curation. The objective of these procedures is to offer standard methods for assessing potential impacts to fossils and mitigating these impacts.”

The guidelines include four categories of paleontological sensitivity for geologic units (formations) that might be impacted by a proposed project, as listed below (BFSA, 2021b, p. 4):

- High Potential: Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered.
- Undetermined Potential: Rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment, and that further study is needed to determine the potential of the rock unit.
- Low Potential: Rock units that are poorly represented by fossil specimens in institutional collections or based upon a general scientific consensus that only preserve fossils in rare circumstances.
- No Potential: Rock units that have no potential to contain significant paleontological resources, such as high-grade metamorphic rocks and plutonic igneous rocks.

3. **Fossil Records Search**

Previous record searches requested by BFSA from the Vertebrate Paleontology Section of the Natural History Museum of Los Angeles County (LACM) have documented the presence of fossil mammal bones from Pleistocene alluvial deposits at the northern and southern limits of Temescal Valley. Southeast of the Project site, at a distance of over seven miles, two localities east of Lake Elsinore produced fossil bones of a horse, *Equus*, and those of a camel, *Camelops hesternus*. To the northwest at a distance of approximately 16 miles, fossil bones of a Pleistocene deer were found in Corona near the intersection of Highway 91 and Interstate-15. These vertebrate fossil localities are apparently the closest known to the project as recorded by the LACM. (BFSA, 2021b, pp. 4-5)

The Division of Geological Sciences at the San Bernardino County Museum (SBCM) reported a locality about four miles northwest of the Project site consisting of a fossil horse tooth of the Pleistocene genus *Plesippus* sp., mixed with plant fossils that were collected in 1965. The report suggested the horse tooth was collected from the coarse, arkosic sandstones observed in the locality area, mapped as Quaternary very old alluvial fan deposits. (BFSA, 2021b, p. 5)

The Silverado Formation (historically termed the Martinez Formation) in the Temescal Valley is characterized by occurring as relatively small, scattered outcrops, but is nevertheless fossiliferous. Paleocene molluscan fossils have been recorded approximately three miles northwest of the Project site, and included nine bivalve and four gastropod species. A similar locality is located approximately a half mile southeast of this site, and included plant remains as well as marine shell fossils. (BFSA, 2021b, p. 5)



C. Paleontological Sensitivity

According to mapping provided by Riverside County GIS, and as depicted on Figure 4.14-1, *Paleontological Sensitivity Map*, a majority of the Project site as mapped as having a High Paleontological Potential/Sensitivity (“High A”), which is defined as follows (BFSA, 2021b, p. 5):

[B]ased on [the presence of] geologic formations or mappable rock units that contain fossilized body elements, and trace fossils such as tracks, nests and eggs. These fossils occur on or below the surface.

The category “High A” indicates that fossils are likely to be encountered at the surface and may be impacted during excavation by construction activities. Formations that are typically assigned a “high” paleontological sensitivity by the County include Quaternary old and very old alluvial fan deposits, including the nearby deposits that are the source for the fossil horse tooth discussed above. Across the Inland Empire, these types of Quaternary sediments have a well-documented record of yielding important Ice Age, and older, fossils, such as large terrestrial vertebrates (e.g., bison, mammoth, mastodon, horse, camel, giant ground sloth, short-faced bears, sabre-tooth cats). (BFSA, 2021b, pp. 5-6)

As shown on Figure 4.14-1, the northwestern portion of the Project site is mapped as having a “Low” Paleontological Potential/Sensitivity. Areas having a low paleontological sensitivity include young (upper Pleistocene to Holocene) surficial sedimentary deposits and are mapped within the northwest corner of the Project site. A “Low” Paleontological Potential/Sensitivity is defined as: (BFSA, 2021b, p. 6)

Following a literature search, records check and a field survey, areas may be determined by a qualified vertebrate paleontologist as having low potential for containing significant paleontological resources subject to adverse impacts.

Assignment of a “Low” sensitivity reflects rocks that generally do not contain fossils, such as modern (Holocene) sedimentary deposits and igneous rocks. Holocene deposits are generally too young to yield fossils. Since a “Low” assignment has been applied to a wide spectrum of rock units, Riverside County requires that a qualified professional conduct an inspection of the site to determine its suitability to yield fossils. (BFSA, 2021b, p. 6)

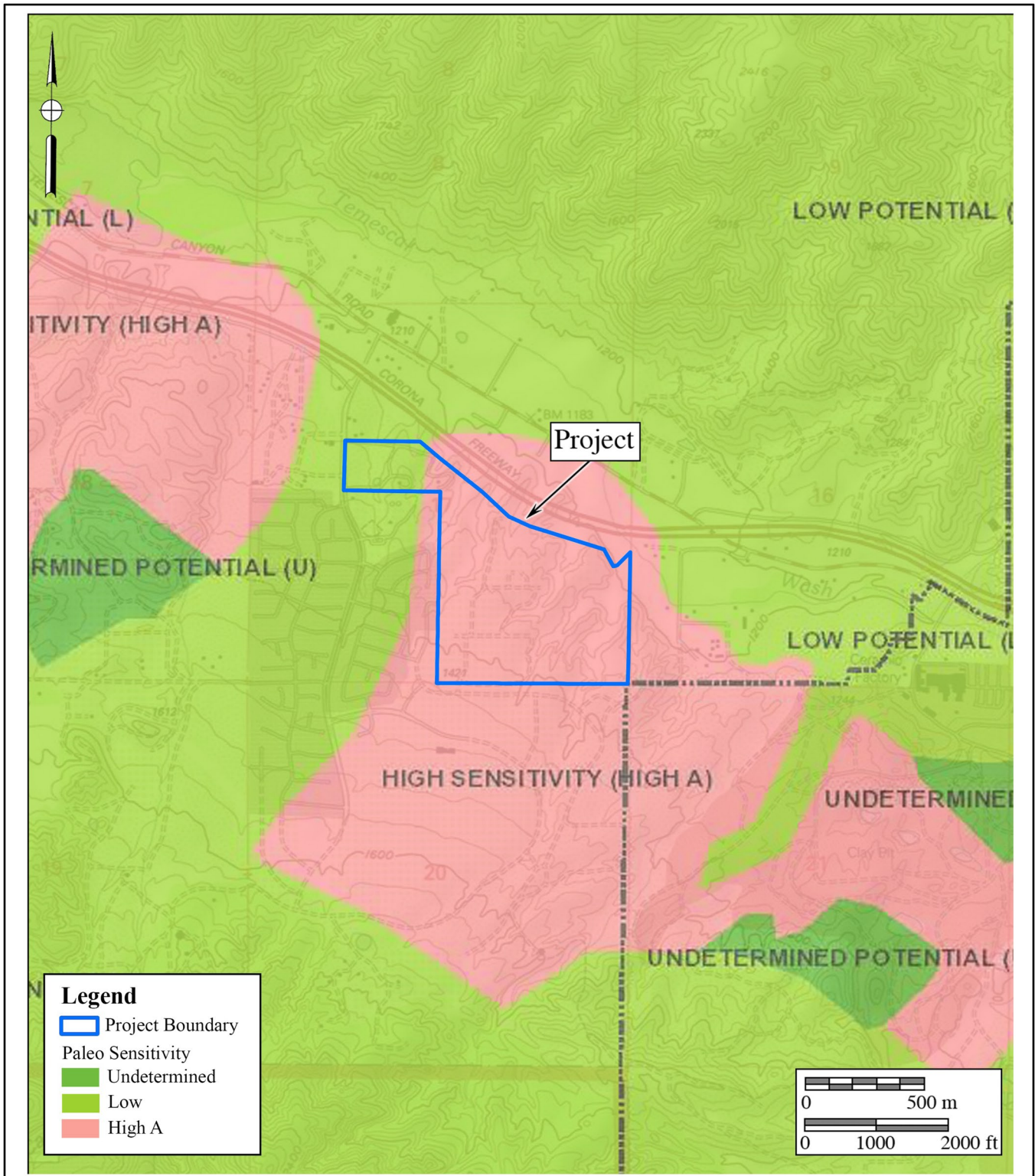
4.14.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to paleontological resources.

A. Federal Regulations

1. Paleontological Resources Preservation Act

The Paleontological Resources Preservation Act (PRPA) was signed into law on March 30, 2009 (Public Law 111-11, Title VI, Subtitle D; 16 U.S.C. §§ 470aaa - 470aaa-11). PRPA directs the Department of Agriculture



Source(s): Brian F. Smith and Associates Inc. (02-05-2021)

Figure 4.14-1



Not to Scale



Paleontological Sensitivity Map



(U.S. Forest Service) and the Department of the Interior (National Park Service, Bureau of Land Management, Bureau of Reclamation, and Fish and Wildlife Service) to implement comprehensive paleontological resource management programs. Section 6310 of PRPA specifically states, "As soon as practical after the date of enactment of this Act, the Secretary shall issue such regulations as are appropriate to carry out this subtitle, providing opportunities for public notice and comment." (NPS, n.d.)

B. State Regulations

1. California Administrative Code, Title 14, Section 4308

Section 4308, *Archaeological Features*, of Title 14 of the California Administrative Code provides that: "No person shall remove, injure, disfigure, deface, or destroy any object of archaeological, or historical interest or value." (CDPR, n.d.)

2. California Public Resources Code

Public Resources Code § 5097.5 states that "A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands." Public Resources Code § 30244 states that, "Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required." (FindLaw, n.d.)

C. Local Regulations

1. Riverside County Planning Department Procedures

In order to ensure the review and protection of paleontological resources for projects subject to CEQA and not otherwise categorically exempt, the Riverside County Geologist performs an initial review of the County of Riverside's database and mapped information for the subject site. When existing information indicates that a site proposed for development has high paleontological sensitivity, a paleontological resource impact mitigation program (PRIMP) is required for the project. The PRIMP shall specify the steps to be taken to mitigate impacts to paleontological resources. If the site warrants protection, then an "Environmental Constraint" is placed on the approved map for the project, stating that: (Riverside County, 2015, pp. 4.9-26 and -27)

"This site, as delineated on this [Environmental Constraint Sheet] map and as indicated in the county's General Plan, has been mapped as having a high potential for containing significant nonrenewable fossil material. The proposed project's potential to impact paleontological resources has been determined to be possible. Therefore, mitigation of this potential impact in the form of monitoring of all site earth-moving activities and collection/curation of all significant fossils unearthed is required unless proven unnecessary through comprehensive literature research and site inspection."



When existing information indicates that a site proposed for development has low paleontological sensitivity, no direct mitigation is required unless a fossil is encountered during site development. Should a fossil be encountered, the Riverside County Geologist must be notified and a paleontologist must be retained by the project proponent. The paleontologist documents the extent and potential significance of the paleontological resources on the site and establishes appropriate mitigation measures for further site development. (Riverside County, 2015, p. 4.9-27)

When existing information indicates that a site proposed for development has undetermined paleontological sensitivity, a report is filed with the Riverside County Geologist documenting the extent and potential significance of the paleontological resources on site and identifying mitigation measures for the fossil and for impacts to significant paleontological resources. (Riverside County, 2015, p. 4.9-27)

4.14.3 BASIS FOR DETERMINING SIGNIFICANCE

Section VII of Appendix G to the State CEQA Guidelines addresses typical adverse effects paleontological resources, and includes the following threshold question to evaluate the Project's impacts to paleontological resources (OPR, 2018a):

- Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, as modified based on the 2018 updates to Section VII of Appendix G to the State CEQA Guidelines (listed above), and indicate significant impacts would occur if the Project or any Project-related component would:

- a. Directly or indirectly destroy a unique paleontological resources, site, or unique geologic feature.*

The significance threshold set forth in Riverside County's Environmental Assessment Checklist, as modified by the 2018 updates to the State CEQA Guidelines, was used to evaluate the significance of the proposed Project's impacts on paleontological resources.

4.14.4 IMPACT ANALYSIS

Threshold a: Would the Project directly or indirectly destroy a unique paleontological resources, site, or unique geologic feature?

There are no unique geologic features on site. Although the Project site features rolling topography and small hillsides, these do not comprise unique geologic features. As such, no impacts to unique geologic features would occur with Project implementation.

Based on the findings of the Project's PRIMP, due to the existence of potentially fossiliferous Quaternary very old alluvial fan deposits mapped across most of the Project site, the known occurrence of terrestrial vertebrate fossils at shallow depths from Quaternary older alluvial fan sediments across the Inland Empire of western



Riverside County, and the “High” paleontological sensitivity rating typically assigned to Quaternary older alluvial fan sediments for yielding paleontological resources, implementation of the proposed Project has the potential to result in direct and indirect impacts to unique paleontological resources. This is evaluated as a significant impact for which mitigation would be required.

4.14.5 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development in the vicinity of the Project site, including buildout of the Riverside County General Plan Land Use Plan and the general plans of cities throughout western Riverside County. This cumulative study area was selected for analysis because it encompasses a region in which geological conditions, and thus paleontological sensitivity, are similar to what occurs in the immediate vicinity of the Project site.

As indicated under the analysis of Threshold a., the Project site is mapped as containing geological formations that have a “High” sensitivity for containing paleontological resources, and the Project has the potential to directly impact unique paleontological resources that may be present on the Project site. Other developments within the region occurring on soils/geologic units with a “High” potential for containing paleontological resources also have the potential to impact subsurface unique paleontological resources during grading and excavation. Therefore, the Project’s potential impacts to paleontological resources on site would be cumulatively considerable.

4.14.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Significant Direct and Cumulatively-Considerable Impact. The Project would not impact any known paleontological resources or unique geological features. However, the Project site is underlain by soils and geologic units with a “High” potential for containing unique paleontological resources. Thus, there is a potential for impacts to paleontological resources during Project grading and excavation. This is evaluated as a significant impact on both a direct and cumulatively-considerable basis.

4.14.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Mitigation

MM 4.14-1 Prior to the issuance of grading permits, the County shall condition proposed grading permits to require implementation of the Project’s Paleontological Resource Impact Monitoring Program (PRIMP), which is included as *Technical Appendix K* to the Project’s EIR. As required by the PRIMP, all mass grading, excavation, drilling, and trenching activities within the very old alluvial fan deposits (“Qvof”), which underlie the majority of the Project site, starting at the surface, are to be monitored full-time for paleontological resources. For earth moving within young alluvial fan deposits (“Qyfa”) and young sandy wash deposits (“Qywa”) mapped at the Project site (i.e., areas considered to have a “Low” potential for containing paleontological resources), periodic “spot check” monitoring shall be performed, consisting of approximately one to three scheduled site visits per week by a paleontological monitor during



construction ground disturbance. If fossils are discovered within the young alluvial fan deposits, full-time monitoring for paleontological resources shall be required. Refer to the Project's PRIMP for a description of additional requirements, including those related to the mandatory pre-construction meeting; salvaging fossils that have been unearthed; sampling of sediments likely to contain the remains of small fossil invertebrates and vertebrates; collecting and processing samples and specimens; identification and curation of fossils; and procedures for reporting findings.

4.14.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold a.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.14-1 would ensure that the Project's PRIMP is implemented as part of future site grading activities. Implementation of the Project's PRIMP would ensure that paleontological resources, if uncovered during site grading activities, are appropriately treated, and would reduce the Project's direct and cumulatively-considerable impacts to paleontological resources to less-than-significant levels.



4.15 POPULATION AND HOUSING

The following analysis discloses existing population and housing data from Riverside County and assesses the potential for impacts on population and housing associated with implementation of the Project. The analysis in this Subsection is based on information contained in the Riverside County General Plan (Riverside County, 2021a) and addresses population and housing projections and requirements from the Southern California Association of Governments (SCAG). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.15.1 EXISTING CONDITIONS

A. Existing Site Conditions

Under existing conditions, the 157.1-acre Project site is vacant and undeveloped, although a portion of the Project site was previously subject to agricultural activity. As indicated in Section 2.0 of this EIR, the Project site is located within the Elsinore Area Plan (EAP) of the Riverside County General Plan. The Project site also is located within the boundaries of the Renaissance Ranch Specific Plan (SP 333). Though the entire Project site is vacant and undeveloped, the General Plan and EAP designate the property for “Medium Density Residential (MDR)” land uses. The adopted SP 333 allows for up to 355 medium-density residential units on minimum lot sizes ranging from 5,000 s.f. to 8,000 s.f., along with a 4.3-acre Community Park, pocket parks on 2.0 acres, open space conservation on 27.1 acres, and open space drainage on 25.7 acres.

B. Population Projections

The Project site is located within unincorporated Riverside County, immediately northwest of the City of Lake Elsinore. According to SCAG’s 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (“RTP/SCS”; also referred to as “Connect SoCal”), and as shown in Table 4.15-1, *SCAG Region Projected 2000-2045 Growth Forecast*, in 2000 the SCAG region had a population of approximately 16,574,000 persons. The population within the County is expected to increase to 22,504,000 persons by 2045, reflecting a 35.7% increase in population over the 45-year period. While the annual rate of household growth has steadily tracked upward since its low of 0.2 percent in 2010, household growth in the SCAG region remains much flatter than before the Great Recession (0.6 percent from 2017-2019). After losing over 700,000 jobs between 2007 and 2010, the region has experienced tremendous job growth between 2010 and 2019, reaching nearly 8.7 million jobs and cresting the previous high of 8.1 million reached in 2007. (SCAG, 2020a, Demographics and Growth Forecast Technical Appendix)

Table 4.15-1 SCAG Region Projected 2000-2045 Growth Forecast

	2000	2010	2016	2045
Population	16,574,000	18,076,000	18,832,000	22,504,000

(SCAG, 2020a, Demographics and Growth Forecast Technical Appendix, Table 3)



4.15.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations governing environmental topics related to population and housing.

A. Federal Plans, Policies, and Regulations

1. Fair Housing Act

The federal Fair Housing Act protects people from discrimination when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities. Additional protections apply to federally-assisted housing. (HUD, n.d.)

2. U.S. Census Bureau

The U.S. Census Bureau is the leading source of statistical information about the nation's people. Population statistics come from decennial censuses, which count the entire U.S. population every ten years, along with several other surveys. The American Community Survey (ACS) is an ongoing annual survey intended to help communities decide where to target services and resources. Demographic surveys measure income, poverty, education, health insurance coverage, housing quality, crime victimization, computer usage, and many other subjects. Economic surveys are conducted monthly, quarterly, and yearly, and cover selected sectors of the nation's economy. (USCB, n.d.)

B. State and Regional Plans, Policies, and Regulations

1. State Housing Law

The State law regulating residential occupancies is entitled the "State Housing Law" and is found in Division 13, Part 1.5 of the California Health and Safety Code (HSC), Sections 17910 to 17998.3 Regulations implementing the State Housing Law mandate statewide residential building standards for new construction, which are found in the California Code of Regulations, Title 24, also referred to as the California Green Building Standards Code (CalGreen). (CA Legislative Info, n.d.)

2. Southern California Association of Governments (SCAG)

SCAG determines regional housing needs and the share of the regional needs to be addressed by Riverside County and its constituent cities. SCAG is a Joint Powers Agency and is the designated Council of Governments (COG), Regional Transportation Planning Agency (RTPA), and Metropolitan Planning Organization (MPO) for the six-county region of Los Angeles, Orange, Ventura, San Bernardino, Riverside, and Imperial counties. SCAG's Regional Comprehensive Plan and Guide (RCPG) and Regional Housing Needs Assessment (RHNA) are tools for coordinating regional planning and housing development strategies in southern California. (SCAG, n.d.)



3. Regional Housing Needs Assessment (RHNA)

State Housing Law (California Government Code Article 10.6, Sections 65580-65590) mandates that local governments, through Councils of Governments (COGs), identify existing and future housing needs in a Regional Housing Needs Assessment (RHNA). The RHNA provides recommendations and guidelines to identify housing needs within counties and cities. The County of Riverside addresses its RHNA allocation through its General Plan Housing Element. The RHNA prepared by SCAG projects the County’s share of regional housing need for 2014-2021 as 30,303 homes, as summarized in Table 4.15-2, *Regional Housing Needs Allocation Unincorporated County (2014-2021)*. (SCAG, n.d.; Riverside County, 2021c, Table H-31)

Table 4.15-2 Regional Housing Needs Allocation Unincorporated County (2014-2021)

Income Category	Allocation
Extremely Low	3,586
Very Low	3,587
Low	4,871
Moderate	5,534
Above Moderate	12,725
Total	30,303

(Riverside County, 2021c, Table H-31)

4. Senate Bill 330 (Housing Accountability Act)

The Housing Accountability Act prohibits a local agency from disapproving, or conditioning approval in a manner that renders infeasible, a housing development project for very low, low-, or moderate-income households or an emergency shelter unless the local agency makes specified written findings based on a preponderance of the evidence in the record. The act specifies that one way to satisfy that requirement is to make findings that the housing development project or emergency shelter is inconsistent with both the jurisdiction’s zoning ordinance and general plan land use designation as specified in any element of the general plan as it existed on the date the application was deemed complete. The act requires a local agency that proposes to disapprove a housing development project that complies with applicable, objective general plan and zoning standards and criteria that were in effect at the time the application was deemed to be complete, or to approve it on the condition that it be developed at a lower density, to base its decision upon written findings supported by substantial evidence on the record that specified conditions exist, and places the burden of proof on the local agency to that effect.

C. Local Plans, Policies, and Regulations

1. Riverside County General Plan Housing Element

The 2017-2021 Housing Element identifies and establishes County policies intended to fulfill the housing needs of existing and future residents in Riverside County. It establishes policies that guide County decision-making and set forth an action plan to implement its housing goals. The Housing Element includes a review of previous housing goals, an assessment of the effectiveness of those goals, and an assessment of housing needs. Additionally, the Housing Element includes an inventory of resources and constraints related to meeting



housing needs in the County; an analysis of affordable housing developments and programs intended to preserve such housing; community goals for the maintenance, preservation, improvement and development of housing; and a program which sets forth a five-year schedule of actions that the County is undertaking or intends to undertake in implementing the polices set forth in the Housing Element. (Riverside County, 2021c, p. H-3)

2. SCAG Regional Transportation Plan/Sustainable Communities Strategy

SCAG is a joint-powers authority (JPA) under California State law, established as an association of local governments and agencies that convene as a forum to address regional issues. On September 3, 2020, SCAG's Regional Council adopted Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). The RTP/SCS is intended to create a plan for defining and solving regional problems including housing, traffic, water, air quality, and other regional challenges. The RTP/SCS builds upon the elements of existing local general plans and provides a blueprint for where and how the Southern California area will grow. (SCAG, 2020a)

4.15.3 BASIS FOR DETERMINING SIGNIFICANCE

Section XIV of Appendix G to the State CEQA Guidelines addresses typical adverse effects due to population and housing, and includes the following threshold questions to evaluate the Project's impacts due to population and housing (OPR, 2018a):

- *Induce substantial unplanned population growth in an area, either directly (for example by proposing new homes and businesses) or indirectly (for example, through the extension of infrastructure); or*
- *Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.*

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section XIV of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact to population and housing if construction and/or operation of the Project would:

- a. *Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere;*
- b. *Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income; or*
- 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).*



The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist were used to evaluate the significance of the proposed Project’s impacts on population and housing.

4.15.4 IMPACT ANALYSIS

Threshold a: Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Under existing conditions, the Project site consists of undeveloped land with no dwelling units or structures located on the Project site. Accordingly, the Project would have no potential to displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. No impacts would occur.

Threshold b: Would the Project create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County’s median income?

Under existing conditions, the Project site is designated for urban development by adopted SP 333, although SP 333 designates the site for residential, recreational, and open space land uses. The Project proposes to amend the land use designations as applied to the Project site to instead provide for a mixture of light industrial, business park, and open space land uses. Although the Project would result in an increase in employment within this portion of Riverside County by approximately 2,436 jobs, Riverside County currently suffers from a poor jobs-housing ratio, wherein there are not enough jobs within the County to prevent the need for County residents to travel outside the region for employment (Riverside County, 2021a, p. LU-27). Thus, with the reduction in the number of planned dwelling units planned on site and a substantial increase in employment opportunities, the Project would assist the County in improving its jobs-housing balance. Furthermore, the Riverside County General Plan designates areas of the County in which lower-income housing can be accommodated to meet the County’s RHNA obligations, and does not rely on residential development on the Project site in order to meet its RHNA obligations. Moreover, it is anticipated that any future employees generated by the Project could be accommodated by existing residential communities and/or by future residential uses to be constructed in accordance with the General Plan Land Use Plan or the general plans of cities within the County, and that no additional housing, including housing affordable to households earning 80% or less of the County’s median income, would be required to accommodate Project-related employees. Impacts would be less than significant.

Threshold c: Would the Project 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)?

Under existing conditions, the Project site is designated for future development as a master-planned residential community that includes recreational and open space uses. The Project Applicant proposes to amend the land use designations for the 157.1-acre Project site to provide for a mixture of light industrial, business park, and open space land uses. Although the Project would result in a change in planned land uses, the Project site already is targeted for urban development under existing conditions. Thus, the Project would not result in



substantial unplanned population growth in the area. Moreover, Riverside County currently suffers from a poor jobs-housing ratio. The Project would replace planned residential uses on site with light industrial and business park land uses, and would result in the generation of approximately 2,436 new and recurring jobs. Thus, the Project would serve to improve the County's jobs-housing ratio, which in turn would reduce the need for County residents to commute outside of the County for employment. Furthermore, the Project's proposed roadway and other infrastructure (e.g., water, sewer, etc.) improvements have been designed and sized to serve the proposed Project, and would not indirectly induce growth in the local area. Thus, the Project would not induce substantial unplanned population growth in the area, either directly or indirectly, and impacts would be less than significant.

4.15.5 CUMULATIVE IMPACT ANALYSIS

For purposes of analysis, the cumulative study area for the issue of population and housing encompasses western Riverside County as well as the various cities within western Riverside County. This study area is appropriate because growth in the region is largely controlled by the Riverside County General Plan and the general plans of the various cities within the County.

The Project site does not contain any existing residential units on site under existing conditions. As such, the Project would not result in the displacement of existing residents or housing, and cumulatively-considerable impacts would not occur.

The Project would result in the generation of approximately 2,436 jobs at full buildout. Although the Project would result in an increase in the number of employment opportunities, the County currently exhibits a low jobs-to-housing ratio. Implementation of the proposed Project is anticipated to help improve the jobs-to-housing ratio, thereby reducing the need for County residents to travel outside of the region for employment. Although the Project may result in an incremental increase in the demand for housing, including housing for lower-income households, it is expected that such an increase could be accommodated by existing housing within the County, or by housing that is already planned for as part of the County's General Plan and the general plans of local cities within the County. Furthermore, the Riverside County General Plan designates areas of the County in which lower-income housing can be accommodated to meet the County's RHNA obligations, and does not rely on residential development on the Project site in order to meet its RHNA obligations. Other cumulative developments within the region would either result in the establishment of new housing units, including those affordable to lower-income households, or would result in the creation of new employment opportunities that would serve to assist the County in improving its jobs-to-housing balance. As such, the Project's contribution to cumulatively-significant impacts due to the creation of demand for additional housing, including affordable housing, would be less than cumulatively considerable.

Under existing conditions, the Project site is designated by the General Plan, EAP, and SP 333 for urban development. Although the Project Applicant proposes to amend the land use designations for the 157.1-acre Project site to provide for a mixture of light industrial, business park, and open space land uses, the employment opportunities generated by the Project are expected to largely be filled by existing County residents, and thus would not create a substantial new demand for housing within the County. The Project would serve to improve



the County's jobs-housing ratio, which in turn would reduce the need for County residents to commute outside of the County for employment. Furthermore, the Project's proposed roadway and other infrastructure (e.g., water, sewer, etc.) improvements have been designed to serve the proposed Project, and would not contribute to or indirectly induce growth in the local area. As such, the Project would not induce substantial unplanned population growth in the area, and impacts would therefore be less-than-cumulatively considerable.

4.15.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a: No Impact. The Project site does not contain any existing residences or housing, and the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Threshold b: Less-than-Significant Impact. The employment-generating land uses proposed as part of the Project (i.e., light industrial and business park land uses) would replace the site's existing residential land use designations, and would result in approximately 2,436 jobs at full buildout. However, it is anticipated that any future employees generated by the Project could be accommodated by existing residential communities and/or by future residential uses to be constructed in accordance with the General Plan Land Use Plan, and that no additional housing, including housing affordable to households earning 80% or less of the County's median income, would be required to accommodate Project-related employees. Impacts would be less than significant.

Threshold c: Less-than-Significant Impact. Because the Project site is designated for development with urban uses by the General Plan, EAP, and SP 333, and because the Project would accommodate employment opportunities in a portion of Riverside County that has a relatively low ratio of jobs to housing, the Project would not directly induce substantial unplanned population growth in the area, and impacts would be less than significant. The Project also would not indirectly induce substantial unplanned population growth due to infrastructure improvements, as all proposed infrastructure improvements would be sized to serve only the proposed Project; thus, indirect population growth impacts would be less than significant.

4.15.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

No significant environmental impacts related to population and housing would occur as a result of the proposed Project. Thus, no mitigation measures are required.



4.16 PUBLIC SERVICES

This Subsection provides information on existing public services and service levels for fire protection, police protection, schools, libraries, and public health facilities, and evaluates impacts to the environment that may result from the demand the Project may have on such services.

4.16.1 EXISTING CONDITIONS

A. Fire Protection/Emergency Medical Services

Fire protection services for the Project site are provided by the Riverside County Fire Department (RCFD). The RCFD provides a full range of fire services within the County and contracting cities. The level of service provided is dependent on response times, travel distance, and staffing workload levels established in the Riverside County Fire Protection and Emergency Medical Aid Plan. The Fire Protection Master Plan contains four fire response categories that are used to determine the response times/travel distances for primary and secondary fire stations. The response categories are based on the amount of community build-out presumed in the Master Fire Plan. The Fire Department assumes in any given region that three or more fire engines respond to any reported fire.

The fire station that would serve the Project is Station 64 (Sycamore Creek), which is located approximately 2.3 roadway miles northwest of the Project site. The Project site also could be served by Station 10 (Elsinore), which is located approximately 9.6 roadway miles southeast of the Project site. The fire stations that could serve the Project site are staffed full-time, 24 hours per day, 7 days per week with a minimum three-person crew, including paramedics, operating a “Type 1” structural firefighting apparatus. (Google Earth, 2018)

B. Sheriff Services

The Riverside County Sheriff’s Department (RCSD) provides community policing for the Project area. The Sheriff Station serving the Project area is the Lake Elsinore Station, located at 333 Limited Avenue in the City of Lake Elsinore, approximately 6.3 miles southeast of the Project site (Google Earth, 2018). In addition to community policing, other services provided by the Sheriff’s Department include, but are not limited to, operating of the emergency 911 system, operating correctional facilities, performing traffic control, and providing crime prevention education. Also, the Sheriff’s Department coordinates with volunteer groups such as Neighborhood Watch Programs and the Community Oriented and Policing Problem Solving (COPPS) Program and the Community Oriented Policing (COP) Program. COPPS shifts the focus of police work from a solely reactive mode by supplementing traditional law enforcement methods with proactive problem-solving approaches that involve the community as well as the police.

Unincorporated Riverside County has set a minimum standard of 1.0 deputy per 1,000 residents. This standard was adopted as part of the “Commitment to Public Safety and Citizens’ Option for Public Safety,” by the Board of Supervisors on September 17, 1996. The Sheriff’s Department has indicated that their desired staffing level is 1.2 deputies per 1,000 residents, while Mitigation Measure 4.15.C of EIR No. 441, which was prepared for the County’s 2003 General Plan, establishes a standard of 1.5 sworn peace officers per 1,000 population.



C. Schools

The Project site is located within the Lake Elsinore Unified School District (LEUSD). The nearest schools to the Project site include the Luiseño Elementary School, which is located approximately 0.1 mile south of the Project site and serves grades K-8, and the Temescal Canyon High School, which is located 4.1 miles southeast of the Project site and serves grades 9-12. During the 2010-2011 school year, the most recent year for which public information is available, the LEUSD had a total enrollment of 22,051 students (Riverside County, 2015, Table 4.17-Q).

D. Libraries

The Project site is located within the Riverside County Public Library System (RCPLS) service area. The County of Riverside operates a system of 35 libraries and two book mobiles (one serving Coachella Valley and one serving western Riverside County) to serve unincorporated populations. In addition, the Riverside County Library System operates an automated network that currently deploys over 350 computer/terminal workstations in the library branches of the Riverside County Library System, Riverside Public Library, Moreno Valley Library, Murrieta Public Library, Murrieta Valley High School and College of the Desert. The network can also be accessed by Riverside County residents via the Internet. The library system manages the library catalog of the 1.3 million items in the library system and the annual checkout of over 3.5 million books, audios, and videos. For 2010, the Riverside County Library System reported a total of 681,117 registered borrowers utilizing County library services. (Riverside County, 2015, pp. 4.17-65 and 4.17-66)

The Riverside County library system does not maintain a specific numerical factor to analyze the needs created by new development. However, the American Library Association suggests that an appropriate service criterion would be availability of convenient library facilities and book reserves at a rate of 0.5 square foot of library space and 2.5 volumes per capita. The County's ability to support the needs of future growth is dependent upon its ability to secure sites for, construct and stock new libraries on a timely basis. As of 2015, there was no specific funding mechanism for expansion of library facilities. Based on 2010 reported registered borrowers (681,117) and current square footage of library facilities available (333,884), as of 2015 facilities provided approximately 0.49 square feet of space per registered borrower (not the Riverside County population as a whole). (Riverside County, 2015, p. 4.17-66)

E. Health Services

The nearest medical facility to the Project site is the Corona Regional Medical Center, located at 800 South Main Street in the City of Corona, or approximately 12.3 miles northwest of the Project site.

4.16.2 APPLICABLE ENVIRONMENTAL REGULATIONS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to public services.



A. State Regulations

1. Fire Protection Services Regulations and Plans

California Code of Regulations (CCR) Title 24, Parts 2 and 9 – Fire Codes

Part 2 of Title 24 of the CCR refers to the California Building Code which contains complete regulations and general construction building standards of State of California adopting agencies, including administrative, fire and life safety and field inspection provisions. Part 2 was updated in 2008 to reflect changes in the base document from the Uniform Building Code to the International Building Code. Part 9 refers to the California Fire Code, which contains other fire safety-related building standards. In particular, Chapter 7A, “Materials and Construction Methods for Exterior Wildfire Exposure,” in the 2010 California Building Code addresses fire safety standards for new construction and Section 701A.3.2 addresses “New Buildings Located in Any Fire Hazard Severity Zone.” (BSC, n.d.)

CCR Title 14 – Natural Resources

These regulations constitute the basic wildland fire protection standards of the California Board of Forestry. They were prepared and adopted to establish minimum wildfire protection standards in conjunction with building, construction, and development within SRAs. Among other things, Title 14 requires the design and construction of structures, subdivisions, and developments in an SRA provide for basic emergency access and perimeter wildfire protection measures (fire fuel modification zones, etc.). (Westlaw, n.d.)

CGC Section 51182 – Defensible Space

Pursuant to this code, a person who “owns, leases, controls, operates or maintains an occupied dwelling or occupied structure in, upon or adjoining a mountainous area, forest-covered land, brush-covered land, grass-covered land or land that is covered with flammable material” in a very high fire hazard severity zone designated by the local agency pursuant to § 51179, shall at all times maintain a specified amount of “defensible space” to protect structures in high fire hazard areas. (CA Legislative Info, n.d.)

2. School Services Regulations and Plans

Assembly Bill (AB) 16

In 2002, AB 16 created the Critically Overcrowded School Facilities program, which supplements the new construction provisions within the School Facilities Program (SFP). The SFP provides State of California funding assistance for new facility construction projects and modernization projects. The Critically Overcrowded School Facilities program allows school districts with critically overcrowded school facilities, as determined by the California Department of Education (CDE), to apply for new construction projects in advance of meeting all SFP new construction program requirements. Districts with SFP new construction eligibility and school sites included on a CDE list of source schools may apply. (CA Legislative Info, n.d.)



□ **Leroy F. Greene School Facilities Act of 1998 (Senate Bill [SB] 50)**

Senate Bill 50 (SB 50) was enacted by the State Legislature in 1998, which amended existing state law governing school fees. In particular, SB 50 amended prior California Government Code (CGC) Section 65995(a) to prohibit state or local agencies from imposing school impact mitigation fees, dedications, or other requirements in excess of those provided in the statute in connection with “any legislative or adjudicative act...by any state or local agency involving...the planning, use, or development of real property....” (CA Legislative Info, n.d.)

The legislation also amended CGC Section 65996(b) to prohibit local agencies from using the inadequacy of school facilities as a basis for denying or conditioning approvals of any “legislative or adjudicative act [involving] the planning, use or development of real property.” Further, SB 50 established the base amount of allowable developer fees: \$1.93 per square foot for residential construction and \$0.31 per square foot for commercial. These base amounts are commonly called “Level 1 fees” and are the same caps that were in place at the time SB 50 was enacted. Level 1 fees are subject to inflation adjustment every two years. (CA Legislative Info, n.d.)

In certain circumstances, for residential construction, school districts can impose fees that are higher than Level 1 fees. School districts can impose Level 2 fees, which are equal to 50% of land and construction costs if they: (1) prepare and adopt a school needs analysis for facilities; (2) are determined by the State Allocation Board to be eligible to impose these fees; and (3) meet at least two of the following four conditions: (CA Legislative Info, n.d.)

- At least 30% of the district’s students are on a multi-track year-round schedule.
- The district has placed on the ballot within the previous four years a local school bond that received at least 50% of the votes cast.
- The district has passed bonds equal to 30% of its bonding capacity.
- Or, at least 20% of the district’s teaching stations are relocatable classrooms.

Additionally, if the State of California’s bond funds are exhausted, a school district that is eligible to impose Level 2 fees is authorized to impose even higher fees. Commonly referred to as “Level 3 fees,” these fees are equal to 100% of land and construction costs of new schools required as a result of new developments. (CA Legislative Info, n.d.)

4.16.3 BASIS FOR DETERMINING SIGNIFICANCE

Section XV of Appendix G to the State CEQA Guidelines addresses typical adverse effects to public services, and includes the following threshold question to evaluate the Project’s impacts to public services (OPR, 2018a):

- *Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government 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:

- o Fire protection?*
- o Police protection?*
- o Schools?*
- o Parks?*
- o Other public facilities?*

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, and have been updated to reflect the 2018 updates to Section XV of Appendix G to the State CEQA Guidelines (listed above). Accordingly, the following threshold questions are used to evaluate the Project's impacts to public services:

- a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection facilities?*
- b. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered sheriff facilities or the need for new or physically altered sheriff facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for sheriff services?*
- c. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities or the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for school services?*
- d. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities or the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services?*
- e. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered health care facilities or the need for new or physically altered health care facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for health care services?*



The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist, as modified/updated per the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project’s impacts on public services.

4.16.4 IMPACT ANALYSIS

Threshold a.: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection facilities?

The Project, which would entail development of the 157.1-acre Project site with light industrial and business park land uses, would place additional demand on the Riverside County Fire Department (RCFD), which provides fire protection services in the Project area. Implementation of the Project would cumulatively affect the Department’s ability to service the planned population. The Project would require an “Urban-Category II” level of service as defined by the Riverside County Fire Protection Master Plan. This classification requires a fire station be within three miles of the Project site, and a full first alarm assignment team operating on the scene within 15 minutes of dispatch. The fire station that would serve the Project is Station 64 (Sycamore Creek), which is located approximately 2.3 roadway miles northwest of the Project site. The Project site would be located within 3.0 miles of the nearest fire station, and a full first alarm assignment team could operate on site within 15 minutes of dispatch. Thus, the RCFD would be able to meet the Urban-Category II Land Use protection goals of the Fire Protection Master Plan for the Project.

As a condition of Project approval, the proposed Project would be required to conform to all mandatory local, State, and federal laws, ordinances, and standards relating to fire safety. Among other items, these requirements include conformance with the Uniform Building Code Section 1503, which requires that all buildings be constructed with fire retardant roofing material. The access routes in the local area would be required to be maintained throughout construction and buildout of the Project. Additionally, the Project would be subject to the fire code standards established as part of Riverside County Ordinance No. 787 (Fire Code Standards). Future buildings on the Project site are required by law to include fire sprinklers. Based on the building type, it is highly likely that the future buildings would be equipped with an Early Suppression, Fast Response (ESFR) fire sprinkler system. ESFR systems incorporate high volume, high-pressure sprinkler heads to provide necessary fire protection. While most other sprinkler systems are intended to control the growth of a fire, an ESFR sprinkler system is designed to suppress a fire. To suppress a fire does not necessarily mean that the system will extinguish the fire but rather it is meant to "knock" the fire back down to its original point of origin. ESFR systems provide buildings with a high margin of fire safety and also allow more time for emergency responders to reach a fire incident before a fire spreads from its point of origin.

Development of the proposed Project would nonetheless impact fire services by placing an additional demand on existing County Fire Department resources and personnel. As set forth by the Riverside County Fire Protection Master Plan, a new fire station and/or appropriate fire company is required for the development of 2,000 dwelling units or more. No residential uses are proposed as part of the Project, and thus the Project



would not result in the need for a new fire station in the local area based on this standard. Notwithstanding, buildout of the Project would entail development of up to 2,509,056 s.f. of light industrial and business park building area. The proposed land uses on site would generate approximately 2,436 employees. The Project could result in an increased number of emergency and public service calls due to the increased presence of structures, traffic, and employees. Although new fire protection facilities ultimately may be needed in the Project area to serve the Project and other future development in the area, it is not possible to identify environmental impacts that may be associated with the development of any new fire protection facilities until a specific proposal and design for the facility is prepared by the RCFD. Accordingly, impacts due to the construction of new or expanded fire protection facilities are too speculative for evaluation in this EIR (State CEQA Guidelines § 15145). Environmental effects of such fire protection facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded fire protection facilities.

The Project is required to adhere to Riverside County Ordinance No. 659, which requires payment of a Development Impact Fee (DIF) to assist the County in providing for fire protection facilities, including fire stations. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and fire station construction. Accordingly, Project-related impacts to fire protection services are evaluated as less than significant and no mitigation would be required.

Threshold b.: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered sheriff facilities or the need for new or physically altered sheriff facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for sheriff services?

Implementation of the proposed Project would result in development of the 157.1-acre Project site with up to 2,509,056 s.f. of light industrial and business park building area. The proposed land uses would generate approximately 2,436 new jobs on site. Development of the property and the introduction of new businesses on the site could result in an incremental increase in criminal activity. However, according to the Riverside County Sheriff's Department (RCSD), there is not a direct correlation between employment growth, the number of crimes committed, and the number of RCSD personnel needed to respond to these increases. As the population and use of an area increases, however, additional financing of equipment and manpower needs are required to meet the increased demand. The proposed Project would result in an increase in the cumulative demand for services from the RCSD, which provides police protection services to the Project site. Specifically, the Project would generate a demand for approximately four new sworn officers (2,436 employees x 1.5 officers/1,000 population = 3.7 officers), based on the 1.5 per 1,000 population service standard (Riverside County, 2015, Table 4.17-H). Staff necessary to support the additional deputies would include an appropriate level of civilian, investigation, and supervisory personnel. The proposed Project would not, however, in and of itself result in the need for new or expanded sheriff facilities to accommodate new personnel.

The Project is required to adhere to Riverside County Ordinance No. 659, which requires payment of a Development Impact Fee (DIF) to assist the County in providing for sheriff protection services, including new



or expanded facilities. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and sheriff facilities construction. Accordingly, Project-related impacts to sheriff protection services are evaluated as less than significant and no mitigation would be required.

Therefore, implementation of the Project would not result in the need for new or expanded sheriff facilities, and impacts would be less than significant. The Project's incremental demand for sheriff protection services also would be less than significant because the Project Applicant would be required to contribute DIF fees. Accordingly, a less-than-significant impact would occur with respect to sheriff protection services or facilities as a result of implementation of the proposed Project.

Threshold c.: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities or the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for school services?

As previously indicated, the Project site is located within the LEUSD. However, no residential uses are proposed as part of the Project. As such, the Project would not result in a direct demand for new or expanded school services in the local area. Notwithstanding, the Project would employ residents currently living in or moving to the area, which could place additional demand on school facilities in the surrounding areas. Although the LEUSD may need to construct new school facilities to meet the growing demand within this portion of unincorporated Riverside County, there are no current publicly-available plans detailing where such facilities would be built. The Project would not directly cause or contribute to the need for new or expanded school facilities, and it is not possible to identify environmental impacts that may be associated with the construction of new or expanded school facilities until a specific proposal and design for a new facility is prepared by the LEUSD, and an analysis of potential physical environmental impacts resulting from the construction and operation of new or expanded school facilities would be speculative in nature (see State CEQA Guidelines § 15145). Environmental effects of such school facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded school facilities. Any mitigation measures required for new or expanded school facilities could be funded, in part, from property taxes and/or through payment of school impact fees (as discussed below).

Although it is not possible to identify physical environmental effects that may result from new or expanded school facilities, the Project Applicant would be required to contribute fees to the LEUSD in accordance with Riverside County Ordinance No. 575. Pursuant to the Leroy F. Greene School Facilities Act of 1998, payment of school impact fees constitutes full and complete mitigation for project-related impacts to school services. Although the Project would not result in a direct increase in demand for school services, mandatory payment of school impact fees still would be required and would ensure that the Project's impacts to school facilities and services would be less than significant. Accordingly, impacts would be less than significant and no mitigation would be required.



Threshold d.: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities or the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services?

The Project would entail development of the 157.1-acre Project site with up to 2,509,056 s.f. of light industrial and business park building area. Land uses proposed as part of the Project would not result in a direct increase in the County's population because no residential uses are proposed.

Although use of the internet has resulted in decreased demand being placed on library services nation-wide, the County continues to maintain its standards for book titles and library square footage. Library services in the County of Riverside are provided by the Riverside County Public Library System (RCPLS). Buildout of the Project would result in up to 2,436 new employees. Assuming that all of the jobs produced by the Project would consist of new residents within the County, in order to attain the RCPLS level of service standard of 2.5 titles-per-capita, the Project-generated employees would require an additional 6,090 titles (2.5 titles-per-capita x 2,436 employees = 6,090 titles). To attain the RCPLS standard of 0.5 square foot of library space per capita, the Project would create the demand for 1,218 s.f. of additional library space (0.5 s.f. of library space per capita x 2,436 employees = 1,218 s.f.). However, these estimates are conservative in nature because the majority of jobs that would be generated by the Project likely would be filled by existing County residents, given the County's generally poor jobs-to-housing ratio. Thus, the Project's impacts to the local library system likely would be substantially less than described above. (Riverside County, 2015, Table 4.17-W)

The provision of additional library space would be addressed through the County's compliance with the adopted level of service standards. Additionally, mandatory compliance with Riverside County Ordinance No. 659 would require the payment of impact fees. These fees would provide funding for library books and library expansion projects. Although new library facilities may be under consideration by the RCPLS in the Project area, it is not possible to identify environmental impacts that may be associated with the development of any new library facilities until a specific proposal and design for the facility is prepared by the RCPLS. Accordingly, impacts due to the construction of new or expanded library facilities are too speculative for evaluation in this EIR (State CEQA Guidelines § 15145). Environmental effects of such library facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded library facilities. Any mitigation measures required for new or expanded library facilities could be funded, in part, from property taxes, including increased property taxes resulting from buildout of the Project site. As such, Project impacts to library facilities and resources would be less than significant.

Threshold e.: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered health care facilities or the need for new or physically altered health care facilities, the construction of which could cause significant environmental



impacts, in order to maintain acceptable service ratios, response times or other performance objectives for health care services?

As previously indicated, the nearest medical facilities to the Project site is the Corona Regional Medical Center, located at 800 South Main Street in the City of Corona, or approximately 12.3 miles northwest of the Project site. The majority of jobs that would be generated by the Project are anticipated to be filled by existing County residents. The Project would result in approximately 2,436 new jobs. Using a 1.9 hospital beds per 1,000 persons generation factor, the Project would generate the need for approximately five new hospital beds ($2,436 \times 1.9 \div 1,000 = 4.6$). However, as most of the future jobs on the Project site would be filled by existing County residents, the Project's conservatively estimated demand for health care services and hospital beds would not represent a new demand for such resources within the County.

The provision of private health care is largely based on economic factors and demand and is beyond the scope of analysis required for this EIR. However, EIR No. 521 concluded impacts associated with buildout of the General Plan would be less than significant, and further notes that: "compliance with...existing General Plan policy and existing Mitigation Measures 4.15.7A and 4.15.7B from EIR No. 441, would further reduce or avoid the insignificant impacts..." (Riverside County, 2015, p. 4.17-18). Mitigation Measure 4.15.7A requires the County to perform periodic medical needs assessments to evaluate the current medical demand and level of medical service provided within each Area Plan every three years. Mitigation Measure 4.15.7B requires the County to fund the new construction and/or expansion of existing medical facilities according to the level of demand for medical services based on the needs assessment required as part of Mitigation Measure 4.15.7A. Furthermore, mandatory compliance with County Ordinance No. 659 requires a development impact fee payment to the County that is partially allocated to public health services and facilities. While new or expanded health care facilities may ultimately be needed within the County due to the anticipated growth in population, it is not possible to identify environmental impacts that may be associated with the development of any new health care facilities until a specific proposal and design for the facility is prepared. Accordingly, impacts due to the construction of new or expanded health care facilities are too speculative for evaluation in this EIR (State CEQA Guidelines § 15145). As such, with payment of mandatory DIF fees, impacts to public medical facilities and resources associated with the proposed Project would be less than significant.

4.16.5 CUMULATIVE IMPACT ANALYSIS

The cumulative study area for public services encompasses the service area of the RCFD, RCSD, LEUSD, and/or RCPLS, and assumes full buildout of the General Plans for jurisdictions within these service areas.

Although the proposed Project would be adequately served by fire protection services, based on the proximity and response times estimated from nearby fire station facilities, the Project would nonetheless result in an incremental increase in requests for service, which would affect the fire department's ability to provide acceptable levels of service. These impacts include an increased number of emergency and public service calls due to the increased presence of structures, increased traffic volumes, and increased population. When considered in the context of on-going cumulative development throughout western Riverside County, such impacts would be cumulatively considerable. However, the proposed Project and all cumulative developments within unincorporated Riverside County would be required to contribute DIF fees pursuant to County



Ordinance No. 659. Mandatory DIF fee contributions by the Project and cumulative developments would ensure that adequate funding is provided to the Riverside County Fire Department for the acquisition of additional facilities, equipment, and personnel. Accordingly, the proposed Project's impact to the RCFD is evaluated as less-than-cumulatively considerable.

Although the Project site would be adequately served by sheriff facilities, the increased population that would be generated by the Project, when considered in conjunction with other on-going development throughout western Riverside County, has the potential to adversely affect service response times. However, the proposed Project and all cumulative developments would be required to contribute DIF fees pursuant to County Ordinance No. 659, which would help to provide for adequate equipment and personnel in the Project area. Therefore, with mandatory payment of DIF fees, Project impacts to police protection services would be less-than-cumulatively considerable.

The proposed Project would entail development of the site with light industrial, business park, and open space land uses, and therefore the Project would not result in a direct demand for school services or new or expanded school facilities. Although the Project may indirectly result in an increase in the population within the LEUSD, the Project Applicant would be required to contribute fees in accordance with Riverside County Ordinance No. 575. Other cumulative developments, including both residential and non-residential developments, would similarly be required to contribute fees pursuant to Riverside County Ordinance No. 575, or similar ordinances within cities within the service area of these school districts. Pursuant to the Leroy F. Greene School Facilities Act of 1998, payment of school impact fees constitutes full and complete mitigation for project-related impacts to school services. As such, and with mandatory fee payment, the Project's impacts to school services and facilities would be less-than-cumulatively considerable.

The Project would entail development of the Project site with up to 2,509,056 s.f. of light industrial and business park building area, and therefore the Project would not result in a direct demand for library services. Although the Project may result in an indirect increase in the County's population, the Project is not expected to result in the need for new or expanded library services or facilities. Furthermore, it is not possible to identify environmental impacts that may be associated with such new or expanded library facilities until a specific proposal and design for such facilities are prepared by Riverside County. Accordingly, impacts due to the construction of new or expanded library facilities are too speculative for evaluation in this EIR (State CEQA Guidelines § 15145). Environmental effects of such library facilities and associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded library facilities. However, the Project and all cumulative developments would contribute property taxes and would be required to contribute DIF fees to Riverside County pursuant to County Ordinance No. 659, which could be used for the purpose of acquiring book titles and/or additional library square footage. Any mitigation measures required for new or expanded library facilities also could be funded, in part, from property taxes allocated by Riverside County to such purposes. Therefore, because environmental impacts associated with new or expanded library facilities cannot be known at this time and would be determined in the future once Riverside County identifies a specific proposal for new or expanded library facilities, Project impacts to library services and facilities are evaluated as less than significant on a cumulatively-considerable basis.



The proposed Project, when considered in conjunction with on-going growth and development in western Riverside County, would cumulatively impact the ability of local medical facilities that provide health services. However, the Project and all cumulative developments would be required to comply with County Ordinance No. 659, which requires a development impact fee payment to the County that is partially allocated to public health services and facilities. With mandatory compliance with Ordinance No. 659, the Project's impacts to health services and facilities would be less than significant on a cumulative basis.

4.16.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a: Less-than-Significant Impact. Although the Project would contribute to a need for new or expanded fire protection facilities, it is not possible to identify environmental impacts that may be associated with such new or expanded fire protection facilities until a specific proposal and design for such facilities are prepared by the RCFD. Accordingly, impacts due to the construction of new or expanded fire protection facilities are too speculative for evaluation in this EIR (State CEQA Guidelines § 15145). Environmental effects of such fire protection facilities and associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded fire protection facilities. Additionally, with payment of mandatory DIF fees, the proposed Project's potential direct and cumulatively-considerable impacts to the Riverside County Fire Department would be less than significant.

Threshold b: Less-than-Significant Impact. With payment of mandatory DIF fees, the proposed Project's potential direct and cumulatively-considerable impacts to the Riverside County Sheriff's Department would be less than significant, and the Project would not result in or require the construction of new police protection facilities that could result in a significant impact to the environment.

Threshold c: Less-than-Significant Impact. The Project would not directly generate a resident population, and thus would not directly impact school services in the local area. Although the Project may indirectly result in new residents within the service area of the LEUSD, and thus may indirectly result in an incremental increase in demand for new school facilities, there are no current publicly-available plans detailing where such facilities would be built. As such, it is not possible to identify environmental impacts that may be associated with the construction of new or expanded school facilities until a specific proposal and design for the facility is prepared by the LEUSD, and an analysis of potential physical environmental impacts resulting from the construction and operation of new or expanded school facilities would be speculative in nature (see State CEQA Guidelines § 15145). Environmental effects of such school facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded school facilities. Any mitigation measures required for new or expanded school facilities could be funded, in part, from property taxes and/or through payment of school impact fees. Furthermore, the payment of mandatory school impact fees would ensure that the Project would result in less-than-significant direct or cumulatively-considerable impacts to the ability of the LEUSD to provide for school services.

Threshold d: Less-than-Significant Impact. The Project would not directly generate a resident population, and thus would not directly impact library services in the local area. Although the Project may indirectly result in new residents within the local area, and thus could result in an incremental increase in demand for increased



library facilities, it is not possible to identify environmental impacts that may be associated with such new or expanded library facilities until a specific proposal and design for such facilities are prepared by Riverside County. Accordingly, impacts due to the construction of new or expanded library facilities are too speculative for evaluation in this EIR (State CEQA Guidelines § 15145). Environmental effects of such library facilities and associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded library facilities. However, the Project would be required to contribute DIF fees, which would be used in part to provide for library space and/or new book volumes. Accordingly, with payment of DIF fees, Project impacts to library services and facilities are evaluated as less than significant on both a direct and cumulatively-considerable basis.

Threshold e: Less-than-Significant Impact. With payment of mandatory DIF fees, the Project would result in less-than-significant direct and cumulatively-considerable impacts to health services facilities, and the Project would not result in or require the construction of new health services facilities that could result in a significant impact to the environment.

4.16.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- As a condition of Project approval, the proposed Project would be required to conform to all mandatory local, State, and federal laws, ordinances, and standards relating to fire safety. Among other items, these requirements include conformance with the Uniform Building Code Section 1503, which requires that all buildings be constructed with fire retardant roofing material. Access routes in the Project area would be required to be maintained throughout construction and buildout of the proposed Project.
- The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a development impact fee (DIF) to assist the County in providing for fire protection facilities, including fire stations. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and fire station construction.
- The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a development impact fee (DIF) to assist the County in providing for sheriff protection facilities, including sheriff stations. Payment of the DIF fee would ensure that funds are available for additional sheriff personnel as well as capital improvements, such as land/equipment purchases and sheriff station construction.
- The Project is required to comply with Riverside County Ordinance No. 575, which requires mandatory payment of school impact fees pursuant to Public Education Code § 17072.10-18.



- The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a development impact fee (DIF) to assist the County in providing for library facilities. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and library construction or expansion.
- The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a development impact fee (DIF) to assist the County in providing for health facilities. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and health facility construction.

Mitigation

Impacts would be less-than-significant; therefore, no mitigation is required.



4.17 RECREATION

This Subsection provides an overview of the existing parks and recreational facilities that exist within the Project vicinity and that could potentially be directly or indirectly physically affected by implementation of the proposed Project. The analysis herein is based in part on the Riverside County General Plan Multipurpose Open Space Element and Healthy Communities Element.

4.17.1 EXISTING CONDITIONS

A. Federal Parks

The only federal park within the Project vicinity is the Cleveland National Forest, located approximately 1.0 mile south and 1.5 miles west of the Project site. The Cleveland National Forest covers a total of 566,866 acres and is the southernmost National Forest in California. It spans across three counties, including San Diego, Orange, and Riverside. The portion within Riverside County totals approximately 90,750 acres and is under U.S. Forest Service management. The Cleveland National Forest features equestrian facilities/trails, fishing, hunting/shooting, hiking trails, overnight camping, off-road vehicle recreation areas, and picnic facilities. (Riverside County, 2015, p. 4.16-7 and Table 4.16-B)

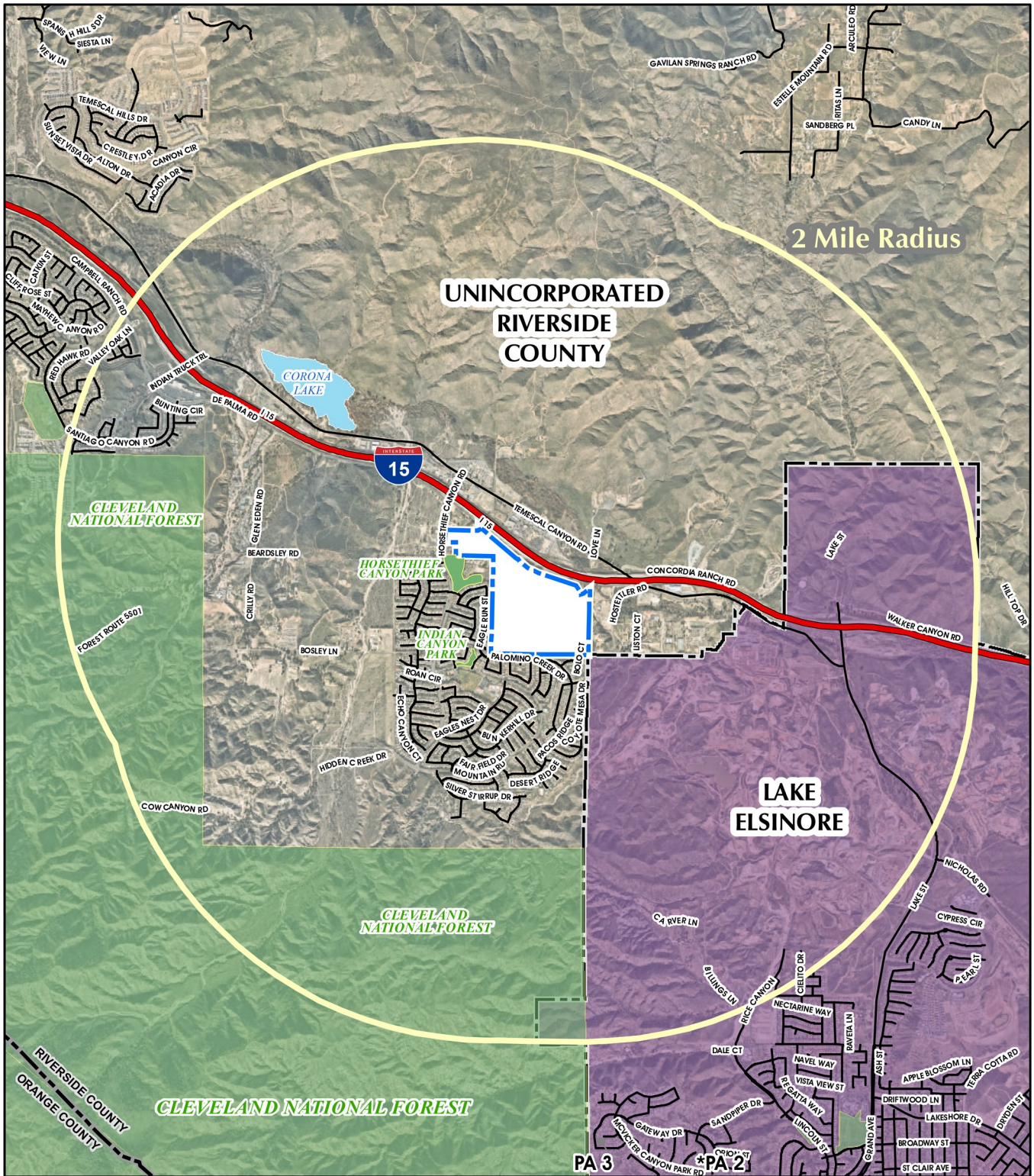
B. State Parks

There are no State parks within the Project vicinity. The nearest State park is the Lake Perris State Recreation Area, located approximately 15.1 miles northeast of the Project site. The Lake Perris State Recreation Area comprises 9,615 acres and provides recreational activities such as hiking, horseback riding, camping and bird watching as well as numerous recreational water activities on Lake Perris. (Riverside County, 2015, p. 4.16-8)

C. Regional and Local Parks

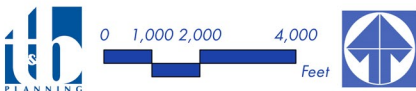
Several regional and local parks occur within a two-mile radius of the Project site. These facilities are depicted on Figure 4.17-1, *Existing Local and Regional Parks and Recreation Facilities*, and are described below:

- **Horsethief Canyon Park.** Horsethief Canyon Park is located immediately adjacent to the northwestern boundary of the Project site. This park includes several multi-purpose playfields, three half-court basketball courts, walking paths, and a tot lot.
- **Indian Creek Park.** Indian Creek Park is located approximately 0.1 mile west of the Project site. This facility includes open play fields and a tot lot.
- **Corona Lake.** Corona Lake is a privately-operated lake that features boat rentals, fishing, picnic areas, and camping facilities.



Source(s): Nearmap Aerial (2022), RCTLMA (2021)

Figure 4.17-1



Existing Local and Regional Parks
and Recreation Facilities



D. Regional Trails and Bikeway Systems

The Elsinore Area Plan (EAP) identifies the County’s long-term objectives for recreational trails and bikeways within the Project area. As previously depicted on EIR Figure 2-10, *Elsinore Area Plan Trails and Bikeway System*, the General Plan and EAP do not identify any planned trails or bikeways within the Project site. A “Community Trail” is planned along the southern and western boundaries of the Project site, and along the site’s frontage with Horsethief Canyon Road. (Riverside County, 2021b, Figure 8)

4.17.2 APPLICABLE ENVIRONMENTAL REGULATIONS

The following is a brief description of the State and local environmental laws and related regulations related to recreation.

A. State Regulations

1. Quimby Act, California Government Code § 66477

The State of California’s Quimby Act was established by the California Legislature for the purpose of preserving open space and providing park facilities for California’s growing communities. The Quimby Act allows local agencies to establish ordinances requiring residential subdivisions to provide land or “in-lieu-of” fees for park and recreation purposes. This State Act requires the dedication of land and/or imposes a requirement of fees for park and recreational purposes as a condition of approval of tentative tract map or parcel map.

B. Local Regulations

1. Riverside County Ordinance No. 460 (Regulating the Division of Land)

Riverside County Ordinance No. 460 establishes the key provisions addressing the division of land in Riverside County. Among other things, in Section 10.35 (Park and Recreation Fees and Dedications), it specifies that: “Whenever land that is proposed to be divided for residential use lies within the boundaries of a public agency designated to receive dedications and fees pursuant to this section, a fee and/or the dedication of land shall be required as a condition of approval of the division of land.” It further specifies that dedication of 3 acres of parkland per 1,000 population, or payment of a fee in-lieu of such dedication, is necessary for the “public interest, convenience, health, welfare and safety.” The fee and/or land dedications or improvements can only be used to provide neighborhood and community parks that would serve the proposed development. (Riverside County, 2015, p. 4.16-17)

4.17.3 BASIS FOR DETERMINING SIGNIFICANCE

Section XVI of Appendix G to the State CEQA Guidelines addresses typical adverse effects to parks and recreation, and includes the following threshold questions to evaluate the Project’s impacts to recreational resources (OPR, 2018a):



- *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*
- *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section XVI of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact to parks and recreation if construction and/or operation of the Project would:

- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment;*
- 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;*
- Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees); or*
- Include the construction or expansion of a trail system.*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts on parks and recreation.

4.17.4 IMPACT ANALYSIS

Threshold a: *Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

Threshold d: *Would the Project include the construction or expansion of a trail system?*

The Project proposes a mixture of light industrial and business park land uses, which would not directly result in an increased demand for recreational facilities. As such, because the Project does not include any residential uses, the Project would not directly require the construction or expansion of recreational facilities off site that may have an adverse physical effect on the environment due to new Project-generated population growth in the area.

However, as part of the Project, a Community Trail would be constructed along one side of proposed Street A on site. The proposed trail alignment is generally consistent with Figure 8 of the EAP, which shows that a Community Trail is planned along the southern and western boundaries of the Project site. The proposed Community Trail would occur in areas already planned for physical disturbance as part of the Project, and there would be no impacts to the environment specifically related to the construction of proposed trails and pedestrian facilities that have not already been addressed throughout this EIR (i.e., for impacts to biological or



cultural resources). As such, and assuming implementation of the mitigation measures identified throughout this EIR, impacts associated with proposed trails and pedestrian facilities on site would be less than significant.

Threshold b: Would the Project include 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?

The Project does not propose any residential uses or other land use that may directly or indirectly generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities, as a majority of the Project's future jobs are anticipated to be filled by existing or future planned residents within the County. Accordingly, implementation of the proposed Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, and impacts would be less than significant.

Threshold c: Would the Project be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?

The Project site is located within County Service Area (CSA) No. 134; however, CSA 134 was established for the purposes of lighting and landscaping, and was not established for purposes of recreational facilities. The Project site is not located within a Community Parks and Recreation Plan. Additionally, the provisions of Section 10.35 of Riverside County Ordinance No. 460, which addresses parkland dedication and in-lieu fees, are not applicable to the proposed Project because the Project does not include any residential subdivision of land; thus, the Project would not be subject to payment of in-lieu fees for recreational resources. Accordingly, impacts due to a conflict with a Community Parks and Recreation Plan and due to the need for payment of in-lieu fees for parkland acquisition and construction would be less than significant.

4.17.5 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development within two miles of the Project site. Although it is not anticipated that future Project employees would substantially utilize recreational facilities in the local area, this study area was selected because any use of local recreation facilities by future Project employees likely would occur in close proximity to the Project site.

As discussed under the analysis of Thresholds a. and d., cumulatively-considerable impacts associated with the construction of proposed trails and pedestrian facilities on site have been evaluated throughout this EIR under the appropriate subject heading (e.g., air quality, biological resources, etc.). Where cumulatively-considerable impacts have been identified associated with Project implementation, mitigation measures have been identified to reduce construction-related impacts to the maximum extent feasible. There are no components of the planned trails or pedestrian facilities on site that have not already been addressed and accounted for throughout this EIR for the Project site. Accordingly, cumulatively-considerable impacts due to the construction of on-site trails and pedestrian facilities would be less than significant.



The Project does not propose any residential uses or other land use that may generate a population that would directly increase the use of existing neighborhood and regional parks or other recreational facilities. Although there may be a nominal increase in the use of local recreation facilities, Project employees are not expected to utilize local recreational facilities to the extent that physical deterioration would occur or be accelerated, even when considered in the context of cumulative developments in the area. Although other cumulative developments in the local area that involve residential use and that don't accommodate adequate recreational facilities may result in physical deterioration of existing recreational facilities, the Project's contribution to such effects would be de minimus and would be less than significant on both a direct and cumulatively-considerable basis.

The Project site is not located within a recreational-related Community Service Area (CSA), and is not located within a park district with a Community Parks and Recreation Plan. The Project also would not be subject to payment of Quimby fees or fees pursuant to Section 10.35 of Riverside County Ordinance No. 460 because the Project does not include any residential uses. Accordingly, impacts due to a conflict with a CSA, due to Quimby fees, or due to a conflict with the park dedication requirements of Riverside County Ordinance No. 460 would be less-than-cumulatively considerable.

4.17.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Thresholds a. and d.: Less-than-Significant Impact. The physical construction of the on-site trails and pedestrian facilities has been addressed under the relevant issue areas identified throughout this EIR (e.g., air quality, biological resources, cultural resources, etc.). Under each of these topics, the Project impacts are determined to be less than significant, or mitigation measures have been identified to reduce impacts to the maximum extent feasible. There are no components of the planned trails or pedestrian facilities on site that have not already been addressed and accounted for throughout this EIR. Accordingly, Project impacts due to parkland development on site would be less than significant, requiring no mitigation beyond that which is identified in other portions of this EIR.

Threshold b.: Less-than-Significant Impact. The Project does not propose any residential uses or other land use that may generate a population that would directly increase the use of existing neighborhood and regional parks or other recreational facilities. Accordingly, implementation of the proposed Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, and impacts would be less than significant.

Threshold c.: Less-than-Significant Impact. The Project site is not located within a CSA that was established for recreational facilities, the Project site is not located within a Community Parks and Recreation Plan, and the Project is not subject to payment of in-lieu fees (Quimby fees) for recreational facilities pursuant to Section 10.35 of Riverside County Ordinance No. 460. Accordingly, impacts due to a conflict with a Community Parks and Recreation Plan and due to the need for payment of in-lieu fees for parkland acquisition and construction would be less than significant.



4.17.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Impacts to recreation would be less than significant; thus, mitigation measures are not required.



4.18 TRANSPORTATION

The following analysis is based on two technical reports prepared by Urban Crossroads, Inc. The first report, entitled, “Renaissance Ranch Specific Plan (SP00333A01) Vehicle Miles Travelled (VMT) Analysis” (herein, “VMT Analysis”), was prepared by Urban Crossroads, Inc., is dated February 2, 2021, and is included as *Technical Appendix L1* to this EIR. The VMT Analysis assesses the Project’s potential impacts due to Vehicle Miles Travelled (VMT), as required pursuant to State Senate Bill 743 (SB 743). (Urban Crossroads, 2021b). The second report also was prepared by Urban Crossroads Inc., and is entitled, “Renaissance Specific Plan (SP00333A01) Traffic Analysis” (herein, “TA”), dated March 1, 2022, and included as *Technical Appendix L2* to this EIR (Urban Crossroads, 2022a). The TA evaluates the potential operating deficiencies of transportation facilities in the proposed Project’s Study Area and identifies improvements that would be needed to relieve operational deficiencies. Additionally, a second technical report was prepared by Urban Crossroads to evaluate potential operating deficiencies in the event that the southern access from Bolo Court is restricted to emergency access only. This report is entitled, “Renaissance Ranch Focused Traffic Assessment,” is dated May 16, 2022, and is included as EIR *Technical Appendix L4*. (Urban Crossroads, 2022b)

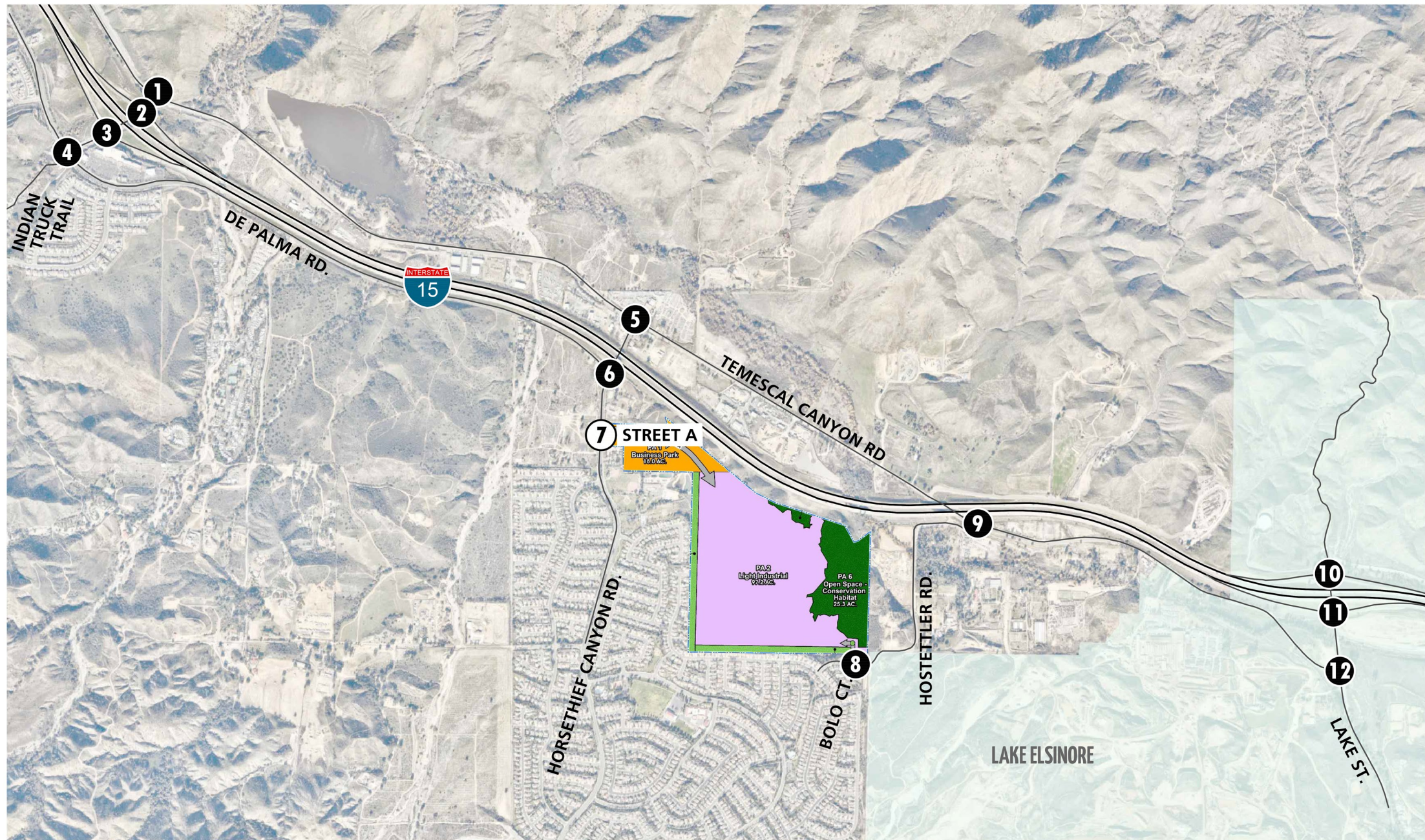
On December 28, 2018, updates to the State CEQA Guidelines were approved by the Office of Administrative Law (OAL). As part of the updates to the State CEQA Guidelines, thresholds of significant for evaluation of impacts to transportation have changed. As required by California Senate Bill (SB) 743, revised Threshold b. of the State CEQA Guidelines for Transportation requires an evaluation of impacts due to Vehicle Miles Travelled (VMT), which replaced the Level of Service (LOS) criteria (i.e., automobile delay) that have been utilized in the past to evaluate potential effects to transportation under CEQA. Accordingly, although this Subsection evaluates the Project’s potential effects to LOS and associated consistency with the LOS standards identified in the Riverside County General Plan, Caltrans, and the City of Lake Elsinore General Plan, it should be noted that pursuant to State CEQA Guidelines Section 15064.3(a), “...a project’s effect on automobile delay shall not constitute a significant environmental impact.”

4.18.1 EXISTING CONDITIONS - VEHICLE MILES TRAVELLED

Under existing conditions, the Project site is not located within 0.5-mile of an existing major transit stop, or along a high-quality transit corridor. Additionally, the Project is located within a Traffic Analysis Zone (TAZ) that generates VMT per employee that is below the County’s threshold of 14.24 VMT per employee. As reported by the Project’s VMT Analysis, the existing county-wide average VMT per employee is 14.24 for office and industrial uses. (Urban Crossroads, 2021b, p. 2)

4.18.2 STUDY AREA DESCRIPTION

Figure 4.18-1, *Project Study Area*, depicts the Study Area selected to evaluate the Project’s potential effects to LOS. The Study Area includes intersections where the Project is anticipated to contribute 50 or more peak hour trips per the County of Riverside’s traffic study guidelines. The “50 peak hour trip” criterion represents a minimum number of trips at which a typical intersection would have the potential to be substantively affected by a given development proposal. The 50 peak hour trip criterion is a traffic engineering rule of thumb that is

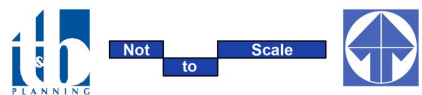


LEGEND:

- 0** = EXISTING INTERSECTION ANALYSIS LOCATION
- = FUTURE INTERSECTION ANALYSIS LOCATION

Source(s): Urban Crossroads (08-23-2021)

Figure 4.18-1





accepted and widely used within Riverside County for estimating a potential area of influence (i.e., Study Area). (Refer to Subsection 1.4 of the Project's TA for a description of study area intersections, freeway mainline segments, and ramp junctions evaluated by the TA.) (Urban Crossroads, 2022a, p. 5)

4.18.3 METHODOLOGIES FOR DETERMINING TRANSPORTATION EFFECTS

This subsection presents the methodologies used to perform the traffic analyses summarized in the Project's TA and VMT Analysis. The methodologies described for analysis of LOS generally are consistent with County of Riverside and Caltrans traffic study guidelines.

A. Level of Service

Traffic operations of roadway facilities are described using the term "Level of Service" (LOS). LOS is a qualitative description of traffic flow based on several factors such as speed, travel time, delay, and freedom to maneuver. Six levels are typically defined ranging from LOS A, representing completely free-flow conditions, to LOS F, representing breakdown in flow resulting in stop-and-go conditions. LOS E represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow. It should be noted that pursuant to SB 743 and Appendix G to the State CEQA Guidelines, a project's effects on automobile delay (i.e., LOS) shall not constitute a significant environmental effect. The analysis included herein addressing LOS is intended to demonstrate consistency with applicable General Plan policies related to LOS, although a determination of significance is not made herein based on LOS standards. (Urban Crossroads, 2022a, p. 23)

B. Analysis Methodologies

1. Vehicle Miles Travelled (VMT) Evaluation Criteria and Methodology

Changes to the State CEQA Guidelines were adopted in December 2018, which require all lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This Statewide mandate took effect July 1, 2020. To aid in this transition, in December 2018 the Governor's Office of Planning and Research (OPR) released a "Technical Advisory on Evaluating Transportation Impacts in CEQA" (Technical Advisory). Based on OPR's Technical Advisory, the County of Riverside has updated their *Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled* (October 2020; herein, "County Guidelines"). Although the County Guidelines have not yet been formally adopted, the analysis of potential VMT impacts in this Subsection is based on the most recent draft of the updated County Guidelines. (Urban Crossroads, 2021b, p. 2)

Consistent with County Guidelines, projects involving office or industrial uses should be evaluated on an efficiency metric. Within Riverside County, the existing Countywide average VMT per employee for work-based trips is 14.24 VMT per employee. (Urban Crossroads, 2021b, p. 2)

The Riverside County Transportation Analysis Model (RIVTAM) is a useful tool to estimate VMT as it considers interaction between different land uses based on socio-economic data such as population, households, and employment. RIVTAM is a travel forecasting model that represents a sub-area (Riverside



County) of the Southern California Association of Governments (SCAG) regional traffic model. RIVTAM was designed to provide a greater level of detail and sensitivity in the Riverside County area as compared to the regional SCAG model. County Guidelines identifies RIVTAM as the appropriate tool for conducting VMT modeling for land use projects within the County of Riverside. (Urban Crossroads, 2021b, pp. 2, 4)

Project generated VMT has been calculated using the most current version of RIVTAM. Adjustments in socio-economic data (“SED”; i.e., employment) for the Project have been made to a separate TAZ within the model to reflect the Project’s light industrial and business park warehouse land uses. A separate TAZ has been utilized to isolate vehicle trips to/from the Project. As previously indicated in EIR subsection 3.6.2, implementation of the proposed Project is anticipated to result in approximately 2,436 new, recurring jobs within the County. (Urban Crossroads, 2021b, p. 4)

2. Level of Service Evaluation Criteria and Methodology

Section 2 of the Project’s TA (*Technical Appendix L2*) includes a discussion of the methodologies used to evaluate Project-related effects to LOS, including potential effects to signalized intersections, unsignalized intersections, traffic signal warrants, freeway off-ramp queuing locations, and freeway mainline segments. (Urban Crossroads, 2022a, pp. 23-29)

4.18.4 EXISTING CONDITIONS

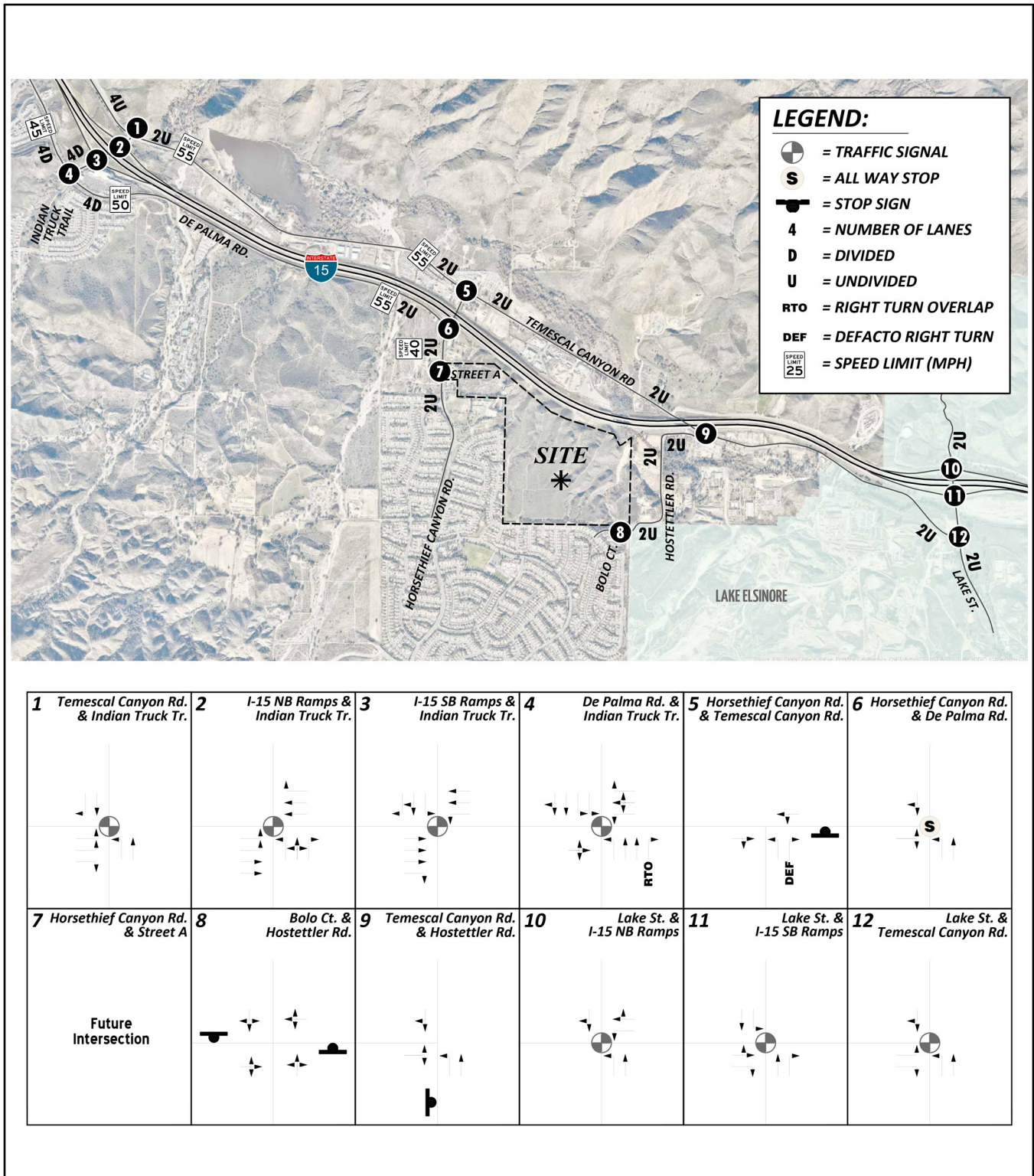
The Project site is largely vacant and undeveloped under existing conditions, and generates no measurable amount of traffic. A description of the existing circulation network in the Project area is provided below.

A. Existing Circulation Network

Pursuant to the scoping agreement with County of Riverside staff (included as Appendix 1.1 to the Project’s TA), the Study Area includes a total of 12 existing and future intersections as shown previously on Figure 4.18-1, where the Project is anticipated to contribute 50 or more peak hour trips or has been added at the direction of County staff. Figure 4.18-2, *Existing Number of Through Lanes and Intersection Controls*, illustrates the Study Area intersections located near the proposed Project and identifies the number of through traffic lanes for existing roadways and intersection traffic controls. (Urban Crossroads, 2022a, p. 33)

B. General Plan Circulation Elements

As noted previously, the Project site is located within the County of Riverside. The roadway classifications and planned (ultimate) roadway cross-sections of the major roadways within the Study Area, as identified on County of Riverside General Plan Circulation Element, are described in Subsection 3.2 of the Project’s TA (*Technical Appendix L2*). Exhibit 3-2 of the Project’s TA shows the County of Riverside General Plan Circulation Element and Exhibit 3-3 of the Project’s TA illustrates the County of Riverside General Plan roadway cross-sections. Exhibits 3-4 and 3-5 of the Project’s TA show the City of Lake Elsinore’s General Plan Circulation Element and roadway cross-sections, respectively. (Urban Crossroads, 2022a, p. 33)



Source(s): Urban Crossroads (08-23-2021)

Figure 4.18-2



Not to Scale



Existing Number of Through Lanes and Intersection Controls



C. Bicycle and Pedestrian Facilities

In an effort to promote alternative modes of transportation, the County of Riverside also includes a trails and bikeway system. The trails and bikeway system, shown on Exhibit 3-6 of the Project's TA (*Technical Appendix L2*), shows the proposed trails connected with major features within the County. There is a proposed community trail along De Palma Road and a proposed historic trail along Temescal Canyon Road. Exhibit 3-7 of the Project's TA shows the City of Lake Elsinore bikeway plan while Exhibit 3-8 of the Project's TA shows the City of Lake Elsinore Area Trails System. (Urban Crossroads, 2022a, p. 39)

Field observations conducted by Urban Crossroads in January 2020 indicates nominal pedestrian and bicycle activity within the Study Area. Exhibit 3-9 of the Project's TA (*Technical Appendix L2*) illustrates the existing pedestrian facilities, including sidewalks and crosswalks. As shown on Exhibit 3-9 of the Project's TA, there are limited existing pedestrian facilities located along portions of De Palma Road, Indian Truck Trail, Temescal Canyon Road, Horsethief Canyon Road, and Bolo Court. (Urban Crossroads, 2022a, p. 39)

D. Transit Service

The County of Riverside is currently served by the Riverside Transit Authority (RTA), a public transit agency serving the unincorporated Riverside County region. There are currently no existing bus routes that serve the roadways within the Study Area in close proximity to the proposed Project. RTA route 205/206 runs along the I-15 Freeway but does not stop within the Study Area. Existing transit routes in the vicinity of the Study Area are illustrated on Exhibit 3-10 of the Project's TA (*Technical Appendix L2*). Transit service is reviewed and updated by RTA periodically to address ridership, budget, and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate. (Urban Crossroads, 2022a, p. 39)

E. Truck Routes

The County of Riverside's General Plan does not provide designated truck routes. Truck routes for the proposed Project have been determined based on discussions with County staff. These truck routes serve both the proposed Project and future cumulative development projects throughout the Study Area. Sensitive land uses have also been taken into consideration as part of determining the best routes for future trucks. (Urban Crossroads, 2022a, p. 39)

F. Existing Traffic Counts

The intersection LOS analysis is based on the traffic volumes observed during the peak hour conditions using traffic count data collected in January 2020, while schools were in session (prior to the closures associated with the COVID-19 pandemic). The following peak hours were selected for analysis: (Urban Crossroads, 2022a, pp. 39, 45, 47)

- Weekday AM Peak Hour (peak hour between 7:00 AM and 9:00 AM)
- Weekday PM Peak Hour (peak hour between 4:00 PM and 6:00 PM)



Refer to Subsection 3.7 of the Project's TA (*Technical Appendix L2*) for a discussion of the results of the existing traffic counts conducted by Urban Crossroads.

G. Existing Conditions Analysis

Refer to Section 3 of the Project's TA (*Technical Appendix L2*) for a discussion of intersection operations, off-ramp queuing operations, and freeway facility operations for existing conditions.

4.18.5 APPLICABLE REGULATORY REQUIREMENTS

A. State Regulations

1. Complete Streets Act – Assembly Bill 1358 (AB 1358)

In September 2008, Gov. Arnold Schwarzenegger signed into law Assembly Bill 1358, the Complete Streets Act. AB 1358 requires that the legislative body of a city or county, upon any substantive revision of the circulation element of the general plan, modify the circulation element to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan. By requiring new duties of local officials, AB 1358 imposes a state-mandated local program. (CA Legislative Info, 2008)

AB 1358 required the Office of Planning and Research (OPR) to prepare or amend guidelines for a legislative body to accommodate the safe and convenient travel of users of streets, roads, and highways in a manner that is suitable to the rural, suburban, or urban context of the general plan, and in doing so to consider how appropriate accommodation varies depending on its transportation and land use context. It authorizes OPR, in developing these guidelines, to consult with leading transportation experts, including, but not limited to, bicycle transportation planners, pedestrian planners, public transportation planners, local air quality management districts, and disability and senior mobility planners. (CA Legislative Info, 2008)

2. Statewide Transportation Improvement Program (STIP)

The Statewide Transportation Improvement Program (STIP) is a multi-year capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the Transportation Investment Fund and other funding sources. STIP programming generally occurs every two years. The programming cycle begins with the release of a proposed fund estimate in July of odd-numbered years, followed by California Transportation Commission (CTC) adoption of the fund estimate in August (odd years). The fund estimate serves to identify the amount of new funds available for the programming of transportation projects. Once the fund estimate is adopted, Caltrans and the regional planning agencies prepare transportation improvement plans for submittal by December 15th (odd years). Caltrans prepare the Interregional Transportation Improvement Plan (ITIP) and regional agencies prepare Regional Transportation Improvement Plans (RTIPs). Public hearings are held in January (even years) in both northern and southern California. The STIP is adopted by the CTC by April (even years). (Caltrans, n.d.)



3. Senate Bill 743 (SB 743)

Senate Bill 743 (Steinberg, 2013), which was codified in Public Resources Code section 21099, required changes to the guidelines implementing State CEQA Guidelines regarding the analysis of transportation impacts. As one appellate court explained: “During the last 10 years, the Legislature has charted a course of long-term sustainability based on denser infill development, reduced reliance on individual vehicles and improved mass transit, all with the goal of reducing greenhouse gas emissions. Section 21099 is part of that strategy...” (*Covina Residents for Responsible Development v. City of Covina* (2018) 21 Cal.App.5th 712, 729.) Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” (*Id.*, subd. (b)(1); see generally, adopted State CEQA Guidelines, § 15064.3, subd. (b) [Criteria for Analyzing Transportation Impacts].) To that end, in developing the criteria, OPR has proposed, and the California Natural Resources Agency (Agency) has certified and adopted, changes to the State CEQA Guidelines that identify vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project’s transportation impacts. With the California Natural Resources Agency’s certification and adoption of the changes to the State CEQA Guidelines, automobile delay, as measured by “level of service” and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA as of July 1, 2020. (Pub. Resources Code, § 21099, subd. (b)(3).) (OPR, 2018b)

4. Senate Bill 325 - Transportation Development Act (Mills-Alquist-Deddeh Act; SB 325)

The Mills-Alquist-Deddeh Act (SB 325) was enacted by the California Legislature to improve existing public transportation services and encourage regional transportation coordination. Known as the Transportation Development Act (TDA) of 1971, this law provides funding to be allocated to transit and non-transit related purposes that comply with regional transportation plans. TDA established two funding sources; the Local Transportation Fund (LTF), and the State Transit Assistance (STA) fund. Providing certain conditions are met, counties with a population under 500,000 (according to the 1970 federal census) may also use the LTF for local streets and roads, construction, and maintenance. The STA funding can only be used for transportation planning and mass transportation purposes. (Caltrans, n.d.)

5. Road Repair and Accountability Act of 2017 (Senate Bill 1)

On April 28, 2017 Governor Brown signed Senate Bill (SB) 1 (Chapter 5, Statutes of 2017), known as the Road Repair and Accountability Act of 2017. Senate Bill 1 (SB 1) augments the base of the State Transit Assistance program essentially doubling the funding for this program. To provide for SB 1 reporting and transparency, transit agencies are asked to work with Caltrans to report on planned expenditures for these augmented funds. (Caltrans, n.d.)



B. Regional Regulations

1. SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code § 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project site is within SCAG’s regional authority. On September 3, 2020, SCAG adopted the *2020-2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS)* (“RTP/SCS”; also referred to herein as “Connect SoCal”) with goals to: 1) Encourage regional economic prosperity and global competitiveness; 2) Improve mobility, accessibility, reliability, and travel safety for people and goods; 3) Enhance the preservation, security, and resilience of the regional transportation system; 4) Increase person and goods movement and travel choices within the transportation system; 5) Reduce greenhouse gas emissions and improve air quality; 6) Support healthy and equitable communities; 7) Adapt to a changing climate and support an integrated regional development pattern and transportation network; 8) Leverage new transportation technologies and data-driven solutions that result in more efficient travel; 9) Encourage development of diverse housing types in areas that are supported by multiple transportation options; and 10) Promote conservation of natural and agricultural lands and restoration of habitats (SCAG, 2020, p. 9). Performance measures and funding strategies also are included to ensure that the adopted goals are achieved through implementation of the RTP.

Connect SoCal includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. Connect SoCal also provides objectives for meeting emissions reduction targets set forth by the California Air Resources Board (ARB); these objectives were provided in a direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. (SCAG, 2020d) Connect SoCal is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods.

The “Goods Movement” Technical Report of Connect SoCal is applicable to the Project because the Project entails a use that is closely associated with, and relies directly on the goods movement system (e.g., manufacturing, construction, retail trade, wholesale trade and transportation, and warehousing). In April 2018 SCAG published *Industrial Warehousing in the SCAG Region*. According to the document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region’s freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, state highways and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. The region is home to approximately 34,000 warehouses with 1.17 billion square feet of warehouse building space, and undeveloped land that could accommodate an additional 338 million square feet of new warehouse building space. These regions attract robust logistics activities, and are a major reason the region is a critical mode in the global supply chain. (SCAG, 2018, p. ES-1)



2. Riverside County Congestion Management Program (CMP)

The intent of a Congestion Management Program (CMP) is to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related deficiencies, and improve air quality. The County of Riverside CMP became effective with the passage of Proposition 111 in 1990 and updated most recently updated in 2011. The RCTC adopted the 2011 CMP for the County of Riverside in December 2011. There are no Study Area intersections identified as a Riverside County CMP facility. (Urban Crossroads, 2022a, p. 5)

C. Western Riverside County Association of Governments Transportation Uniform Mitigation Fee

The Western Riverside Council of Governments (WRCOG) established a consolidated Transportation Uniform Mitigation Fee (TUMF) program for all of western Riverside County, which commenced in 2003. The establishment of TUMF was based on the desire to establish a single, uniform fee program to mitigate the cumulative impacts of new development on the sub-region's arterial highway system rather than having multiple and potentially uncoordinated fee programs across the region. WRCOG is responsible for establishing and updating TUMF payment rates, based on a TUMF Program Nexus Study, which is periodically updated to consider the impact of future development on the subregion's system of highways and arterial roads. The most recent Nexus Study update was approved by the WRCOG Executive Committee in July 2017. The updated Nexus Study continues to demonstrate the relationship between the TUMF fee levels and the cost of anticipated improvements to the Regional System of Highways and Arterials (RSHA) necessitated by new development throughout western Riverside County. (WRCOG, 2018, p. 3)

D. Local Regulations

Ordinances specifically applicable to the circulation system are presented below (Riverside County, 2015, p. 4.18-28)

- Ordinance No. 413 – Vehicle Parking: Ordinance No. 413 establishes regulations to vehicle parking on Riverside County roadways.
- Ordinance No. 452 – Speed Limits: Ordinance No. 452 pertains to prima facie speed limits on Riverside County roadways and establishes or amends prima facie speed limits on certain Riverside County roads.
- Ordinance No. 460 – Subdivision of Land: Ordinance No. 460, in conjunction with the Subdivision Map Act, establishes regulations for the division of land and describes procedures. The ordinance also includes the provisions for the establishment of Road and Bridge Benefit Districts and associated fees.
- Ordinance No. 461 – Road Improvement Standards and Specifications: Ordinance No. 461 adopts Road Improvement Standards and Specifications.
- Ordinance No. 499 – Encroachments in County Highways: Ordinance No. 499, subject to the control of the Board of Supervisors, delegates to the Riverside County Transportation Director the



administration of the use of county highways, including county roads, for excavations and encroachments; construction, operation, and maintenance of utility facilities; planting, maintenance, and removal of trees; and the issuance, modification, and revocation of permits for such uses.

- Ordinance No. 500 – Vehicles: Weight of Vehicles: Ordinance No. 500 enables the County to regulate vehicle traffic on highways, roads, and bridges in or near residential areas pursuant to provisions in the California Vehicle Code so as to improve quality of life and traffic safety in residential areas.
- Ordinance No. 659 – Development Mitigation Fee for Residential Development (DIF Program): Ordinance No. 659 establishes a development impact fee (DIF) for the development of infrastructure, including County roadways and the installation of traffic signals.
- Ordinance No. 671 – Consolidated Fees for Land Use and Related Functions: Ordinance No. 671 establishes a consolidated fee program for land use and related functions. This is a deposit-based fee (DBF) program and provides for unused fees to be refunded to the applicant.
- Ordinance No. 748 – Mitigation of Traffic Congestion Through Signalization: Ordinance No. 748 establishes a fee program for the installation of traffic signals based on a priority list. The fee would also have a component for the installation of traffic signal interconnect, and a component for the application of intelligent transportation systems technologies.
- Ordinance No. 824 – Western Riverside County Transportation Uniform Mitigation Fee (TUMF) Program: Ordinance No. 824 establishes a TUMF program for the western portion of Riverside County. The fees are collected by the County of Riverside and administered by WRCOG to make roadway improvements in the WRCOG area. TUMF funds are intended for use solely for the engineering, construction, and right-of-way acquisition for regional facilities. TUMF funds may not be used to defray operational and maintenance expenses. Facilities eligible for TUMF are designated by WRCOG and updated periodically. They include streets, arterials and road improvements as defined in the ordinance.

4.18.6 BASIS FOR DETERMINING SIGNIFICANCE

A. Thresholds of Significance

Section XVII of Appendix G to the State CEQA Guidelines addresses typical adverse effects to transportation, and includes the following threshold questions to evaluate a project's impacts on transportation (OPR, 2018):

- *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;*
- *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);*
- *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);*



- *Would the project result in inadequate emergency access.*

The following thresholds are derived from Riverside County's Environmental Assessment Checklist, which incorporate the current Appendix G thresholds pursuant to the 2018 changes to the State CEQA Guidelines, in order to evaluate the significance of the proposed Project's impacts on transportation. The proposed Project would result in a significant impact to transportation if the Project or any Project-related component would:

- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;*
- Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).*
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment);*
- Cause an effect upon, or a need for new or altered maintenance of roads;*
- Cause an effect upon circulation during the project's construction;*
- Result in inadequate emergency access or access to nearby uses; or*
- Include the construction or expansion of a bike system or bike lanes.*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, as modified/updated per the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on transportation.

B. Thresholds for Significance for Vehicle Miles Travelled (VMT)

As noted in the County Guidelines, the Project may result in a significant project generated VMT impact if the base model year project generated VMT per employee exceeds the existing Countywide average VMT per employee (i.e., County threshold). The existing Countywide average VMT per employee is 14.24 for office and industrial uses. (Urban Crossroads, 2021b, p. 3)

C. Applicable Level of Service (LOS) Standards and Deficiency Criteria

The definition of an intersection deficiency and deficiency criteria have been obtained from each of the applicable surrounding jurisdictions. Refer to Subsections 2.7 and 2.8 of the Project's TA (*Technical Appendix L2*) for a description of the LOS standards and deficiency criteria applicable to study area facilities within unincorporated Riverside County, the City of Lake Elsinore, and Caltrans. As previously indicated, intersection deficiencies based on delay (LOS) shall not constitute a significant environmental impact under CEQA (see State CEQA Guidelines § 15064.3).



4.18.7 IMPACT ANALYSIS

Threshold a: Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

In addition to LOS standards established by the Riverside County General Plan, City of Lake Elsinore General Plan, and Caltrans, which are discussed below, the only applicable programs, plans, ordinances, or policies addressing the circulation system are the County's General Plan, Elsinore Area Plan (EAP), and Riverside County ordinances. Future development on site would be required to comply with all applicable Riverside County ordinances related to the circulation system, including, but not limited to, Ordinance No. 460 (relating to required access, roadway dedications, roadway design, etc.) and Ordinance No. 726 (relating to transportation demand management). In addition, EIR *Technical Appendix I* includes a detailed analysis of the proposed Project's consistency with the Riverside County General Plan and LNAP policies. As demonstrated in the analysis therein, with approval of the Project's proposed General Plan Amendment No. 200004, the proposed Project would not conflict with any applicable policies of the General Plan or EAP, including policies within the General Plan Circulation Element and EAP that relate to the circulation system, transit, roadway, bicycle, and/or pedestrian facilities. Based on the detailed analysis contained in EIR *Technical Appendix I*, the proposed Project clearly would be compatible with the objectives, policies, and programs specified in the Riverside County General Plan and EAP, and also would be in general agreement and harmony with the terms and requirements of the General Plan and EAP. Accordingly, impacts would be less than significant.

With respect to the LOS standards, the Project's TA (*Technical Appendix L2*) was prepared in order to demonstrate compliance with the LOS standards established by the Riverside County General Plan, City of Lake Elsinore General Plan, and Caltrans. Refer to the Project's TA for a discussion of the methodology used to evaluate the Project's effects on LOS, a summary of existing traffic conditions within the Study Area, and for the results of the analysis of the Project's impacts to study area intersections, traffic signal warrants, off-ramp queuing analyses, and freeway facilities.

As indicated in the Project's TA, although the Project would contribute to projected LOS deficiencies and the need for signalization of Study Area facilities, the Project would be conditioned to require construction of improvements, payment of DIF and TUMF fees, and payment of fair-share contributions towards improvements not included in any existing fee programs. With exception of facilities under the jurisdiction of Caltrans, the improvements to be constructed as part of the Project, as part of the DIF or TUMF programs, or as the result of Project fair-share contributions would provide for an acceptable LOS at all Study Area facilities. Although it is expected that segments of I-15 and associated merge/diverge junctions would not achieve Caltrans' LOS standards under near- or long-term conditions, Caltrans does not have any fee programs in place to address impacts to freeways or ramp junctions. Additionally, the LOS standards identified by the Riverside County General Plan, City of Lake Elsinore General Plan, and Caltrans are aspirational, and indirect effects associated with the Project's contribution to LOS deficiencies already are addressed throughout this EIR (refer specifically to EIR Subsections 4.3, *Air Quality*, 4.6, *Energy*, 4.8, *Greenhouse Gas Emissions*, and 4.13, *Noise*). Furthermore, pursuant to SB 743 and State CEQA Guidelines § 15064.3(a), "...a project's effect on



automobile delay shall not constitute an environmental impact.” As such, for purposes of CEQA, the Project’s contribution to the projected LOS deficiencies at Study Area facilities would be less than significant.

Accordingly, and based on the preceding analysis, the proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

Threshold b: Would the Project conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

As previously discussed, SB 743, approved in 2013, was intended to change the way transportation impacts are determined according to CEQA. Updates to the State CEQA Guidelines that were approved in December 2018 included the addition of State CEQA Guidelines Section 15064.3, of which Subdivision b establishes criteria for evaluating a project’s transportation impacts based on project type and using automobile VMT as the metric. As a component of OPR’s revisions to the State CEQA Guidelines, lead agencies were required to adopt VMT thresholds of significance by July 1, 2020. Based on OPR’s Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018; herein, “Technical Advisory”), the County of Riverside has published a draft Transportation Analysis Preparation Guide (herein, “County Guidelines”). Although the new County Guidelines have yet to be formally adopted by the County, the analysis herein is based on the draft County Guidelines for evaluating the Project’s impacts due to VMT. (Urban Crossroads, 2021b, p. 2)

A. Analysis Scenarios

RIVTAM is a useful tool to estimate VMT as it considers interaction between different land uses based on socio-economic data such as population, households, and employment. RIVTAM is a travel forecasting model that represents a sub-area (Riverside County) of the SCAG regional traffic model. RIVTAM was designed to provide a greater level of detail and sensitivity in the Riverside County area as compared to the regional SCAG model. County Guidelines identifies RIVTAM as the appropriate tool for conducting VMT modeling for land use projects within the County of Riverside. (Urban Crossroads, 2021b, p. 2)

Project VMT has been calculated using the most current version of RIVTAM. Adjustments in socio-economic data (SED) (i.e., population, households, and employment) have been made to separate traffic analysis zones (TAZs) within the RIVTAM model to reflect the Project’s proposed land uses (i.e., residential and retail). Consistent with County Guidelines, VMT analysis was conducted for existing and cumulative scenarios that include the following: (Urban Crossroads, 2021b, pp. 2-3)

- Existing Conditions – RIVTAM base year (2012) traffic model conditions.
- Existing Plus Project Conditions – RIVTAM base year (2012) traffic model plus the proposed Project land uses.
- Cumulative No Project Conditions – RIVTAM cumulative model (2040) without the proposed Project land use changes (i.e., adopted land use assumptions).



- Cumulative Plus Project Conditions - RIVTAM cumulative model (2040) plus the proposed Project land use changes.

B. VMT Assessment

Adjustments to employment for the Project’s TAZ were made to the RIVTAM base year model. Project-generated home-based work VMT was then calculated following the VMT calculation procedures identified in Appendix E of the County Guidelines and includes home-based work trips that are both internal and external to the RIVTAM model boundaries. The home-based work VMT value is then normalized by dividing by the number of Project employees. (Urban Crossroads, 2021b, p. 3)

As noted in the County Guidelines, the Project may result in a significant project generated VMT impact if the base model year project generated VMT per employee exceeds the existing Countywide average VMT per employee (i.e., County threshold). The existing county-wide average VMT per employee is 14.24 for office and industrial uses. Table 4.18-1, *Project VMT per Employee*, provides a comparison of the VMT analysis conducted for existing and cumulative scenarios. (Urban Crossroads, 2021b, p. 3)

Table 4.18-1 Project VMT per Employee

	VMT per Employee	Percent Change
County Threshold	14.24	
Existing (2012)		
Renaissance Ranch Specific Plan	Not Applicable ³	
Riverside County	14.24	0.00%
E+P		
Renaissance Ranch Specific Plan	22.76	59.81%
Riverside County	14.67	3.04%
Cumulative No Project		
Renaissance Ranch Specific Plan	Not Applicable	
Riverside County	16.35	14.83%
Cumulative Plus Project		
Renaissance Ranch Specific Plan	22.97	61.33%
Riverside County	16.44	15.48%

(Urban Crossroads, 2021b, Table 3)

As shown in Table 4.18-1, the Existing Plus Project generated VMT per employee is 22.76 which would exceed the County’s adopted threshold by approximately 60 percent. The transportation impact based on the assessment of Project generated VMT as compared to the County’s adopted threshold is potentially significant. (Urban Crossroads, 2021b, p. 4)

Appendix E of the County Guidelines states the following, “for Specific Plans and Community Plans, Riverside County requires that Cumulative analysis be completed irrespective of the findings of Baseline Plus Project



conditions. Additionally, No Project and Plus Project conditions under both the Baseline and Cumulative must provide total Regional VMT values. Note that the Regional VMT values are for informational purposes and are not used as the basis for the determination of a significant impact.” Table 4.18-1 provides a comparison of VMT per employee for Cumulative No Project and Plus Project scenarios. The adopted land use assumptions for the Cumulative No Project Conditions consist primarily of residential uses. As such, the Work VMT per employee is anticipated to increase as the adopted residential uses are proposed to change to employment uses. (Urban Crossroads, 2021b, p. 4)

Total link-level VMT also was extracted from the for the “No Project” and “Plus Project” base year (2012) and cumulative year (2040) models, as depicted in Table 4.18-2, *Riverside County Total VMT*. As shown, the Project would result in a net increase in total VMT within the County under base year and cumulative year conditions. (Urban Crossroads, 2021b, p. 4)

Table 4.18-2 Riverside County Total VMT

	Riverside County
Base Year (2012) No Project	53,661,883
Base Year (2012) With Project	53,686,366
Cumulative Year (2040) No Project	92,508,071
Cumulative Year (2040) With Project	92,545,074

(Urban Crossroads, 2021b, Table 4)

In conclusion, because the Existing Plus Project generated VMT per employee is 22.76 and would exceed the County’s adopted threshold of 14.24 by approximately 60 percent, Project impacts due to VMT would be significant prior to mitigation.

Threshold c: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The proposed Project as evaluated in this EIR consists of a proposed General Plan Amendment (GPA No. 200004), proposed Amendment No. 1 to Specific Plan No. 333 (SP 333A1), and a proposed Change of Zone (CZ No. 2000016). As such, the Project only provides general requirements with respect to roadway improvements that may be needed for future implementing developments within the Project site, such as future roadway classifications as shown on EIR Figure 3-3, and roadway cross-sections as depicted on EIR Figure 3-4. Specific improvements to the surrounding circulation network would be determined as part of future implementing projects within the Project site, such as tentative tract maps and plot plans. At that time, Riverside County would review the plans to ensure that there would be no substantial increase in hazards due to a geometric design feature, such as sharp curves or dangerous intersections. Impacts would be less than significant.

The Project entails development of the Project site with business park, light industrial, and open space uses. Land uses in the vicinity of the Project site include residential uses, recreation facilities, and the Horsethief



Canyon Wastewater Treatment Plant to the west and south, with open space, I-15, rural residential uses, open space, and several light industrial/business park uses and open space to the north of I-15. Land uses to the east include several rural residential dwelling units, open space, and an existing construction storage yard. Although the truck trips that would be generated by the Project have the potential to conflict with traffic related to residential and recreational uses, the Project's truck traffic would be routed directly to the I-15 on and off ramps at Indian Truck Trail and Lake Street via Horsethief Canyon Road and Temescal Canyon Road, and would be directed away from residential streets. As such, the Project would not result in increased hazards to transportation as a result of incompatible uses, and impacts due to incompatible uses would be less than significant.

Threshold d: Would the Project cause an effect upon, or a need for new or altered maintenance of roads?

Implementation of the proposed Project would result in the establishment of one new roadway (proposed Street A) requiring maintenance. Additionally, it is anticipated that roadways internal to the Project site also could consist of public roadways. In addition, Project traffic would utilize existing and future planned roadways, and would thereby incrementally increase the need for maintenance of these facilities. Although the Project would result in the need for new or altered maintenance of roadways and would increase traffic on existing and planned roadways, any incremental increase in the need to maintain public roadway facilities would be offset by tax revenue generated by the Project's proposed land uses. There are no components of the proposed Project that would result in or require a substantial increase in expenditures by Riverside County for public road maintenance such that environmental impacts would result. As such, Project impacts would be less than significant.

Threshold e: Would the Project cause an effect upon circulation during the project's construction?

Aside from proposed improvements at the intersection of Street A and Horsethief Canyon Road, as well as improvements to Street A and other roadways internal to the Project site, the Project would not involve any major improvements to Study Area roadways. Improvements at the intersection of Street A and Horsethief Canyon Road would be limited to the installation of a stop sign and turn lanes along the westbound approach to the intersection. These improvements are not anticipated to adversely affect traffic operations along Horsethief Canyon Road during the Project's construction phase. There are no other Project-related improvements that would have the potential to adversely affect circulation during Project-related construction activities. Additionally, although construction activities associated with the Project would result in traffic associated with construction equipment, deliveries, and construction personnel, the total amount of traffic that would be generated during Project construction would be far less than the amount of traffic associated with buildout of the proposed Project. Specifically, the Project's Air Quality Assessment (*Technical Appendix B*) and Energy Analysis (*Technical Appendix E*) indicate that the highest traffic generation during construction would occur during building construction. The anticipated vendor and worker trips during the building construction phase is estimated at 1,842 trips per day. In comparison, the Project's trip generation from the TA (*Technical Appendix L2*) is anticipated to be 5,422 trips per day. The TA evaluated 12 study area intersections and all intersections were anticipated to operate at an acceptable level of service during the peak hours under Existing and Existing Plus Ambient Plus Project (EAP) traffic conditions. As such, it is anticipated



that the intersections would operate at acceptable levels of service during the construction period as the highest trips are approximately a third of the total Project operational trips. Thus, Project construction-related traffic would not result in any LOS deficiencies that could adversely affect circulation during the Project's construction. Accordingly, impacts would be less than significant.

Threshold f: Would the Project result in inadequate emergency access or access to nearby uses?

The Project proposes a network of internal roadways and drive aisles within the Project site that would be constructed to County standards. During the County's review of the proposed Project, the County reviewed the proposed design plans to ensure that adequate emergency access would be available at the site. Additionally, the County would review future implementing development applications (e.g., tentative maps, parcels maps, plot plans, etc.) to ensure that adequate emergency access is accommodated. Furthermore, the Project would not entail the construction of any major transportation improvements within the Study Area that could adversely affect emergency access. The Project also would not adversely affect access to any nearby uses. Accordingly, the proposed Project would not result in inadequate emergency access during construction or long-term operation, and impacts would be less than significant.

Threshold g: Would the Project include the construction or expansion of a bike system or bike lanes?

The Project would entail the construction of Street A on site, which would include a community trail along one side of the roadway, which would accommodate both pedestrians and bicycles. However, impacts associated with the construction of these on-site trails is inherent to the Project's construction phase, and such impacts have been evaluated throughout this EIR. Where significant impacts have been identified, feasible mitigation measures have been identified to reduce impacts to the maximum feasible extent. There are no impacts associated with the construction of bike systems or bike lanes that have not already been addressed herein. As such, impacts would be less than significant.

4.18.8 CUMULATIVE IMPACT ANALYSIS

Cumulative impacts associated with transportation were largely evaluated in the preceding subsection (subsection 4.18.7). A summary of the impacts identified therein is provided below. Direct impacts are identified in subsection 4.18.7 and are not discussed below. Additionally, impacts that were shown to be less than significant in subsection 4.18.7 are not discussed below.

As discussed under the analysis of Threshold a., future development on site would be required to comply with all applicable Riverside County ordinances related to the circulation system. In addition, EIR *Technical Appendix I* demonstrates that with approval of the Project's proposed General Plan Amendment No. 200004, the proposed Project would not conflict with any applicable policies of the General Plan or EAP, including policies within the General Plan Circulation Element and EAP that relate to the circulation system, transit, roadway, bicycle, and/or pedestrian facilities. Other cumulative projects similarly would be required to comply with all applicable ordinances, and would be required to comply with all applicable General Plan and EAP policies (or the policies of the general plans of cities within the Project's Study Area). Impacts would be less-than-cumulatively considerable.



With respect to LOS standards, the Project would cause or contribute to LOS deficiencies at a number of Study Area facilities. In addition to physical construction of required improvements to achieve an acceptable LOS, the Project Applicant also would be conditioned to contribute TUMF and DIF fees as well as fair-share contributions for required improvements that are not currently included in existing fee programs. With exception of facilities under the jurisdiction of Caltrans, the Project-related improvements as well as improvements to occur as part of existing fee programs and/or Project fair-share contributions would achieve an acceptable LOS at all Study Area facilities. Other projects within the cumulative Study Area similarly would be required to construct improvements, pay fair-share fees, or contribute funds to existing fee programs as necessary to achieve acceptable LOS. As such, and with exception of facilities under the jurisdiction of Caltrans, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less-than-cumulatively considerable.

With respect to Caltrans facilities, Caltrans has long-range plans for improvements to the I-15, which are expected to improve LOS along the I-15 and associated ramp junctions. However, there are some Study Area freeway segments and ramp junctions that are anticipated to continue to operate at an unacceptable LOS during the peak hours. Although this represents a potential conflict with Caltrans' LOS standards, Caltrans does not currently have a mitigation fee program in place to address impacts to freeway facilities. Furthermore, pursuant to SB 743 and State CEQA Guidelines § 15064.3(a), "...a project's effect on automobile delay shall not constitute an environmental impact." As such, for purposes of CEQA, the Project's contribution to the projected LOS deficiencies at freeway mainline segments and merge/diverge locations would be less-than-cumulatively considerable.

As indicated under the analysis of Threshold b., for the Project's light industrial and business park uses, the Existing Plus Project generated VMT per employee is 22.76 which would exceed the County's adopted threshold of 14.24 VMT per employee by approximately 60 percent. Other cumulative projects within the Project region also have the potential to exceed the County's thresholds of significance for VMT. Accordingly, VMT associated with the Project's light industrial and business park components would result in cumulatively-considerable impacts due to VMT.

As indicated under the analysis of Threshold c., future implementing projects (e.g., tentative tract maps, plot plans, etc.) within the Project site would be reviewed by Riverside County to ensure that no hazards due to a geometric design feature would result from roadway improvements planned as part of implementing development. Other cumulative developments would similarly be required to demonstrate to Riverside County that no unsafe geometric design features would result. As such, cumulatively-considerable impacts would be less than significant.

As also indicated under the analysis of Threshold c., although the truck trips that would be generated by the Project have the potential to conflict with traffic related to residential uses, the Project's truck traffic would be routed directly to the I-15 on and off ramps at Indian Truck Trail and Lake Street via Horsethief Canyon Road and Temescal Canyon Road, and would be directed away from residential streets. As such, the Project would



not result in increased hazards to transportation as a result of incompatible uses, and impacts due to incompatible uses would be less-than-cumulatively considerable.

As discussed under the analysis of Threshold d., tax revenue generated by the Project and cumulative developments would offset any increased need for roadway maintenance as a result of new development within Riverside County. There are no components of the proposed Project or other cumulative developments within the Project vicinity that would result in or require a substantial increase in expenditures by Riverside County for public road maintenance such that environmental impacts would result. As such, impacts would be less-than-cumulatively considerable.

As discussed under the analysis of Threshold e., aside from proposed improvements at the intersection of Street A and Horsethief Canyon Road, as well as improvements to Street A and other roadways internal to the Project site, the Project would not involve any major improvements to Study Area roadways. Improvements at the intersection of Street A and Horsethief Canyon Road would be limited to the installation of a stop sign and turn lanes along the westbound approach to the intersection. These improvements are not anticipated to adversely affect traffic operations along Horsethief Canyon Road during the Project's construction phase. Additionally, although construction activities associated with the Project would result in traffic associated with construction equipment, deliveries, and construction personnel, the total amount of traffic that would be generated during Project construction would be far less than the amount of traffic associated with buildout of the proposed Project. Specifically, the Project's Air Quality Assessment (*Technical Appendix B*) and Energy Analysis (*Technical Appendix E*) indicate that the highest traffic generation during construction would occur during building construction. The anticipated vendor and worker trips during the building construction phase is estimated at 1,842 trips per day. In comparison, the Project's trip generation from the TA (*Technical Appendix L2*) is anticipated to be 5,422 trips per day. The TA evaluated 12 study area intersections and all intersections were anticipated to operate at an acceptable level of service during the peak hours under Existing and EAP traffic conditions. As such, it is anticipated that the intersections would operate at acceptable levels of service during the construction period as the highest trips are approximately a third of the total Project operational trips. Thus, Project construction-related traffic would not result in any LOS deficiencies that could adversely affect circulation during the Project's construction. As such, cumulatively-considerable impacts due to adverse construction-related effects upon circulation would not occur.

A. Threshold f.

The Project proposes a network of internal roadways and drive aisles within the Project site that would be constructed to County standards. During the County's review of the proposed Project, the County reviewed the proposed design plans to ensure that adequate emergency access would be available at the site. Additionally, the County would review future implementing development applications (e.g., tentative maps, parcels maps, plot plans, etc.) to ensure that adequate emergency access is accommodated. Furthermore, the Project would not entail the construction of any major transportation improvements within the Study Area that could adversely affect emergency access. The Project also would not adversely affect access to any nearby uses. As such, the Project would not result in inadequate emergency access or access to nearby uses, and impacts would be less-than-cumulatively considerable.



B. Threshold g.

The Project would entail the construction of Street A on site, which would include a community trail along one side of the roadway. However, impacts associated with the construction of these on-site trails is inherent to the Project's construction phase, and such impacts have been evaluated throughout this EIR. Where significant impacts have been identified, feasible mitigation measures have been identified to reduce impacts to the maximum feasible extent. There are no cumulatively-considerable impacts associated with the construction of bike systems or bike lanes that have not already been addressed by this EIR. As such, impacts would be less than significant on a cumulatively-considerable basis.

4.18.9 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Less-than-Significant Impact. The proposed development on site would be required to comply with all applicable Riverside County ordinances related to the circulation system. In addition, EIR *Technical Appendix I* includes a detailed analysis of the proposed Project's consistency with the Riverside County General Plan and EAP policies. As demonstrated in the analysis therein, with approval of the Project's proposed General Plan Amendment No. 200004, the proposed Project would not conflict with any applicable policies of the General Plan or EAP, including policies within the General Plan Circulation Element and EAP that relate to the circulation system, transit, roadway, bicycle, and/or pedestrian facilities. With respect to the LOS standards, the Project would be conditioned to require construction of improvements, payment of DIF and TUMF fees, and payment of fair-share contributions towards improvements not included in any existing fee programs. With exception of facilities under the jurisdiction of Caltrans, the improvements to be constructed as part of the Project, as part of the DIF or TUMF programs, or as the result of Project fair-share contributions would provide for an acceptable LOS at all Study Area facilities. Although it is expected that segments of I-15 and associated merge/diverge junctions would not achieve Caltrans' LOS standards under near- or long-term conditions, Caltrans does not have any fee programs in place to address impacts to freeways or ramp junctions. Furthermore, pursuant to SB 743 and State CEQA Guidelines § 15064.3(a), "...a project's effect on automobile delay shall not constitute an environmental impact." As such, for purposes of CEQA, the Project's contribution to the projected LOS deficiencies at freeway mainlines and merge/diverge locations would be less than significant.

Threshold b.: Significant Direct and Cumulatively-Considerable Impact. For the Project's light industrial and business park uses, the Existing Plus Project generated VMT per employee is 22.76 which would exceed the County's adopted threshold of 14.24 by approximately 60 percent. Thus, prior to mitigation, Project impacts due to VMT would be potentially significant on both a direct and cumulatively-considerable basis.

Threshold c.: Less-than-Significant Impact. Improvements planned as part of the Project would be constructed to County standards, and would not increase hazards due to a geometric design feature. Although the Project's light industrial and business park land uses have the potential to result in conflicts with traffic from surrounding rural residential and master-planned residential communities, would be routed directly to the I-15 on and off ramps at Indian Truck Trail and Lake Street via Horsethief Canyon Road and Temescal Canyon Road, and would be directed away from residential streets. As such, the Project would not result in increased hazards to



transportation as a result of incompatible uses, and impacts due to incompatible uses would be less than significant.

Threshold d.: Less-than-Significant Impact. There are no components of the proposed Project that would result in or require a substantial increase in expenditures by Riverside County for public road maintenance such that environmental impacts would result. As such, Project impacts would be less than significant.

Threshold e.: Less-than-Significant Impact. Aside from proposed improvements at the intersection of Street A and Horsethief Canyon Road, as well as improvements to Street A and other roadways internal to the Project site, the Project would not involve any major improvements to Study Area roadways. Improvements at the intersection of Street A and Horsethief Canyon Road would be limited to the installation of a stop sign and turn lanes along the westbound approach to the intersection. These improvements are not anticipated to adversely affect traffic operations along Horsethief Canyon Road during the Project's construction phase. There are no other Project-related improvements that would have the potential to adversely affect circulation during Project-related construction activities. Accordingly, impacts would be less than significant.

Threshold f.: Less-than-Significant Impact. The Project proposes a network of internal roadways and drive aisles within the Project site that would be constructed to County standards. During the County's review of the proposed Project, the County reviewed the proposed design plans to ensure that adequate emergency access would be available at the site. Additionally, the County would review future implementing development applications (e.g., tentative maps, parcels maps, plot plans, etc.) to ensure that adequate emergency access is accommodated. Furthermore, the Project would not entail the construction of any major transportation improvements within the Study Area that could adversely affect emergency access. The Project also would not adversely affect access to any nearby uses. Accordingly, the proposed Project would not result in inadequate emergency access during construction or long-term operation, and impacts would be less than significant.

Threshold g.: Less-than-Significant Impact. The Project would entail the construction of Street A on site, which would include a community trail along one side of the roadway. However, impacts associated with the construction of these on-site trails is inherent to the Project's construction phase, and such impacts have been evaluated throughout this EIR. Where significant impacts have been identified, feasible mitigation measures have been identified to reduce impacts to the maximum feasible extent. There are no impacts associated with the construction of bike systems or bike lanes that have not already been addressed herein. As such, impacts would be less than significant.

4.18.10 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.



- Prior to issuance of building permits, the Project Applicant shall pay appropriate Development Impact Fee Program (DIF) fees at the rates then in effect in accordance with Riverside County Ordinance No. 659.
- Prior to final building inspection, the Project Applicant shall pay appropriate Western Riverside County Transportation Uniform Mitigation Fee Program Ordinance (TUMF) fees at the rates then in effect in accordance with Riverside County Ordinance No. 824.
- Prior to approval of any implementing developments (i.e., tentative tract maps, plot plans, conditional use permits, etc.), the Project Applicant or implementing developer shall prepare a Traffic Analysis (TA) in compliance with the most recent version of the Riverside County Transportation Department’s “Transportation Analysis Guidelines.” Appropriate conditions of approval shall be imposed on future implementing developments based on the results of the future-required TA(s) to address projected Level of Service (LOS) deficiencies along the transportation network. Anticipated Project-related responsibilities for improvements, fee payments, and fair-share contributions are summarized in Table 4.18-3, *Project Transportation Improvements, Fee Payments, and Fair-Share Contributions*, of the Project’s EIR. The actual improvements, fee payments, and fair-share contributions shall be based on the results of the TA(s) required for each implementing development, and may vary from the list of improvements, fee payments, and/or fair-share contributions listed in Table 4.18-3.

Mitigation

MM 4.18-1 Prior to approval of future implementing projects (i.e., plot plans, conditional use permits, etc.), the Project Applicant shall prepare a project-level Vehicle Miles Travelled (VMT) analysis to identify site-specific Transportation Demand Management (TDM) measures to reduce VMTs associated with the Project’s proposed uses to the maximum feasible extent. TDM strategies that may be applicable at the implementing project level may include:

- Provide pedestrian and bicycle network improvements within the development connecting to existing off-site facilities at Horsethief Canyon Road, Bolo Court and Hostettler Road.
- Where applicable ensure design of key intersections and roadways encourage the use of walking, biking, and transit.
- Collaborate with the Riverside Transit Authority (RTA) to determine the feasibility of providing new or re-route existing transit services to the site.
- Commute trip reduction (CTR) programs offered by individual building tenants that would encourage the use of vanpools, carpooling, public transit, and biking.
- CTR programs may also provide for alternative work or compressed work schedules to reduce the number of days an employee commutes to work.
- Provision of on-site facilities to provide end of trip services for bicycling such as secure bike parking, storage lockers and showering facilities.



MM 4.18-2 All owner users and future tenants shall participate in Riverside County's Rideshare Program. The purpose of this program is to encourage 2+ person occupancy vehicle trips and encourage other alternative modes of transportation. Carpooling opportunities and public transportation information shall be advertised to employees of the building tenant. Developer and all successors shall include the provisions of this obligation in all leases of the Project so that all tenants shall fulfill the terms and conditions of this mitigation measure. The developer and all successors shall maintain records demonstrating compliance with these requirements, which shall be made available to Riverside County staff upon request.

4.18.11 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold b.: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. The Existing Plus Project generated VMT per employee is 22.76, which would exceed the County's adopted threshold of 14.24 VMT per employee by approximately 60 percent. Mitigation Measure MM 4.18-1 requires that a VMT assessment be prepared for future implementing developments (i.e., plot plans, conditional use permits, etc.) in order to identify feasible site-specific TDM strategies that would serve to reduce VMT, while Mitigation Measure MM 4.18-2 requires future owner users and tenants to participate in Riverside County's Rideshare Program. However, inclusion of such VMT reduction measures in areas that are characteristically suburban in context are limited to a maximum VMT reduction of 15%. This maximum reduction for cross-category transportation-related mitigation measures of 15% for suburban settings is also noted in the County Guidelines. Therefore, even with the implementation of all feasible VMT reduction measures, Project-generated VMT cannot be reduced to a level of less than significant. (Urban Crossroads, 2021b, pp. 5-6)

Table 4.18-3 Project Transportation Improvements, Fee Payments, and Fair-Share Contributions

#	Intersection	Jurisdiction	Existing (2020)	EAP (2025)	EAPC (2025)	Horizon Year (2040) Without Project	Horizon Year (2040) With Project	Improvements in City DIF or County TUMF? ¹	Project Responsibility ²	Fair Share % ³
1	Temescal Canyon Rd. & Indian Truck Tr.	County of Riverside	None	None	Modify the traffic signal to implement overlap phasing for the SB right turn lane	Same	Same	No	Fair Share	13.2%
4	De Palma Rd. & Indian Truck Tr.	County of Riverside	None	None	Restripe the WB approach to provide one left turn lane, one shared left-through lane, and dual right turn lanes	Same	Same	No	Fair Share	5.4%
					Modify the traffic signal to implement overlap phasing for the WB right turn lanes	Same	Same	No	Fair Share	
5	Horsethief Canyon Rd. & Temescal Canyon Rd.	County of Riverside	None	None	None	Install a Traffic Signal	Same	Yes (DIF)	Fees	33.0%
						Add 2nd NB left turn lane	Same	No	Fair Share	
						Stripe the NB right turn defacto lane	Same	No	Fair Share	
						Add 2nd EB through lane	Same	Yes (TUMF)	Fees	
						Add 2nd WB left turn lane	Same	No	Fair Share	
						Add 2nd WB through lane	Same	Yes (TUMF)	Fees	
6	Horsethief Canyon Rd. & De Palma Rd.	County of Riverside	None	None	None	Install a Traffic Signal	Same	Yes (DIF)	Fees	38.2%
						Add 2nd NB through lane	Same	No	Fair Share	
						Add 2nd SB through lane	Same	No	Fair Share	
						Add EB left turn lane	Same	No	Fair Share	
7	Horsethief Canyon Rd. & Street A	County of Riverside	None	Install a stop control on the WB approach Add WB shared left-right turn lane Add SB left turn lane	Same	Not Applicable	Same as EAP (2025)	No	Construct	38.0%
					Same	Not Applicable	Same as EAP (2025)	No	Construct	
					Same	Same	Same	No	Construct	
					Install a stop control on the EB approach	Same	Same	No	Other ⁴	
					Add EB shared left-through-right turn lane	Same	Same	No	Other ⁴	
					Add NB left turn lane	Same	Same	No	Other ⁴	
					Add 2nd NB through lane	Not Applicable	Same as EAPC (2025)	No	Construct	
					Add 2nd SB through lane	Not Applicable	Same as EAPC (2025)	No	Other ⁴	
10	Lake St. & I-15 NB Ramps	Caltrans, Lake Elsinore, County	None	None	None	Add 2nd NB left turn lane	Same	Yes (TUMF)	Fees	--

Table 4.18-3 Project Transportation Improvements, Fee Payments, and Fair-Share Contributions (Cont'd)

#	Intersection	Jurisdiction	Existing (2020)	EAP (2025)	EAPC (2025)	Horizon Year (2040) Without Project	Horizon Year (2040) With Project	Improvements in City DIF or County TUMF? ¹	Project Responsibility ²	Fair Share % ³
11	Lake St. & I-15 SB Ramps	Caltrans, Lake Elsinore, County	None	None	Add 2nd NB through lane Add 2nd SB through lane	Same Same	Same Same	Yes (TUMF) Yes (TUMF)	Fees Fees	--
12	Lake St. & Temescal Canyon Rd.	Lake Elsinore, County	None	None	Add 2nd NB left turn lane Add 2nd NB through lane Add 2nd SB through lane Add 2nd EB left turn lane Add 3rd NB through lane Add 3rd SB through lane	Same Same Same Same Same Same	Same Same Same Same Same Same	Yes (TUMF) Yes (TUMF) Yes (TUMF) Yes (TUMF) Yes (TUMF) Yes (TUMF)	Fees Fees Fees Fees Fees Fees	--

1. Improvements included in County of Riverside DIF or County TUMF programs for local and regional components.
2. Identifies the Project's responsibility to construct an improvement or contribute fair share or fee payment towards the implementation of the improvement shown.
3. Program improvements constructed by project may be eligible for fee credit, at discretion of City. See Table 8-1 of the Project's TA (*Technical Appendix L2*) for Fair Share Calculations.
4. The 2nd southbound lanes are to be constructed by the adjacent Tract 37002 along its frontage through this intersection.
(Urban Crossroads, 2022a, Table 1-3)



4.19 TRIBAL CULTURAL RESOURCES

The analysis in this Subsection documents the results of the County’s consultation with local Native American Tribes. It should be noted that much of the written and oral communication between Native American tribes and Riverside County is considered confidential in respect to places that have traditional tribal cultural significance (Gov. Code § 65352.4), and although relied upon in part to inform the preparation of this EIR Subsection, those communications are treated as confidential and are not available for public review. Under existing law, environmental documents must not include information about the location of archeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (Cal. Code Regs. § 15120(d)).

4.19.1 EXISTING CONDITIONS

Refer to EIR subsection 4.5.1 for a complete description of the cultural setting existing site conditions, and the archaeological and historical resources assessment.

4.19.2 REGULATORY SETTING

The following is a brief description of the State environmental laws and related regulations addressing Tribal Cultural Resources (TCRs). Refer also to EIR subsection 4.5.2 for a complete description of federal, State, and local environmental laws and regulations governing the protection of cultural resources.

A. Traditional Tribal Cultural Places Act (Senate Bill 18, “SB 18”)

Senate Bill 18 (SB 18) requires local (city and county) governments to consult with California Native American tribes to aid in the protection of traditional tribal cultural places (“cultural places”) through local land use planning. SB 18 also requires the Governor’s Office of Planning and Research (OPR) to include in the General Plan Guidelines advice to local governments for how to conduct these consultations. (OPR, 2005)

The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places. The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level land use decisions are made by a local government. (OPR, 2005)

SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to adoption and amendment of both general plans (defined in Government Code § 65300 et seq.) and specific plans (defined in Government Code § 65450 et seq.). Although SB 18 does not specifically mention consultation or notice requirements for adoption or amendment of specific plans, existing state planning law requires local governments to use the same processes for adoption and amendment of specific plans as for general plans (see Government Code § 65453). Therefore, where SB 18 requires consultation and/or notice for a general plan adoption or amendment, the requirement extends also to a specific plan adoption or amendment. (OPR, 2005)



1. *Assembly Bill 52 (AB 52)*

California Assembly Bill 52 (AB 52) (2014) Chapter 532 amended Section 5097.94 of, and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21802.3, 21083.09, 21084.2 and 21084.3 to the California Public Resources Code, relating to Native Americans. AB 52 was approved on September 25, 2014. By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process. (OPR, 2017b)

The Public Resources Code now establishes that “[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.” (Pub. Resources Code, § 21084.2.) To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. (Pub. Resources Code, § 21080.3.1.) (OPR, 2017b)

If a lead agency determines that a project may cause a substantial adverse change to tribal cultural resources, the lead agency must consider measures to mitigate that impact. Public Resources Code § 20184.3 (b)(2) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources. These rules apply to projects that have a notice of preparation for an environmental impact report or negative declaration or mitigated negative declaration filed on or after July 1, 2015. (OPR, 2017b)

§ 21074 of the Public Resources Code defines “tribal cultural resources.” In brief, in order to be considered a “tribal cultural resource,” a resource must be either:

- (1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or
- (2) a resource that the lead agency chooses, in its discretion, to treat as a tribal cultural resource. (OPR, 2017b)

In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources. In applying those criteria, a lead agency must consider the value of the resource to the tribe. (OPR, 2017b)



4.19.3 BASIS FOR DETERMINING SIGNIFICANCE

Section XVIII of Appendix G to the State CEQA Guidelines addresses typical adverse effects on tribal cultural resources, and includes the following threshold question to evaluate the Project’s impacts to tribal cultural resources (OPR, 2018a):

- 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, 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:
 - 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)?
 - 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?

Significance thresholds are set forth in Riverside County’s Environmental Assessment Checklist, as modified based on the 2018 updates to Section XVIII of Appendix G to the State CEQA Guidelines, and indicate significant impacts would occur if the Project or any Project-related component would:

- a. *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, 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*
 1. *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); or*
 2. *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.*

4.19.4 IMPACT ANALYSIS

Threshold a.: *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, 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:

- 1. 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); or*
- 2. 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?*

Changes in the California Environmental Quality Act, effective July 2015, require that the County address another category of cultural resources – tribal cultural resources. Tribal Cultural Resources (TCRs) are those resources with inherent tribal values that are difficult to identify through the same means as archaeological resources. These resources can be identified and understood through direct consultation with the tribes who attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may also include other types of resources such as a cultural landscape. Also relevant is the category termed “traditional cultural property” (TCP) which is typically associated with cultural resource management performed under federal auspices. “Traditional” in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a community’s historically rooted beliefs, customs, and practices. A TCP can be defined, generally, as one that is eligible for inclusion in the National Register of Historic Places (NRHP) because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community’s history, and (b) are important in maintaining the continuing cultural identity of the community. A landscape can be a TCP and by extension a TCR, provided the cultural landscape meets the criteria and that the landscape is geographically defined in terms of the size and scope. The appropriate treatment of tribal cultural resources is determined through consultation with tribes.

In compliance with Assembly Bill 52 (AB52), notices regarding this Project were mailed to all requesting tribes. No response was received from Santa Rosa Band of Mission Indians, Colorado River Indian Tribe, Cahuilla Band of Indians, Morongo Band of Mission Indians, Pala Band of Mission Indians, or the Ramona Band of Cahuilla Mission Indians. The Agua Caliente Band of Cahuilla Indians deferred to closer groups. Consultation was requested by the Pechanga Band of Mission Indians, Rincon Band of Mission Indians, and the Soboba Band of Mission Indians.

This Project also was subject to SB 18 tribal consultation. On January 21, 2021, a Sacred Lands File Search (SLF) and consultation list request was sent to the Native American Heritage Commission. A response was received on January 28, 2021 with a list of thirteen contacts and the results of the Sacred Lands File Search which was Negative. Notices were sent to all contacts on January 31, 2021. A response was received from the Agua Caliente Band of Cahuilla Indians on February 3, 2021 stating that the project was not within their Traditional Use Area and that they deferred to other tribes.



The Soboba Band of Luiseno Indians responded via email requesting Government to Government consultation for this Project. The Soboba Band was provided with the cultural report on April 06, 2021 and the Project conditions of approval on June 28, 2021. This Project was discussed during a meeting held on June 09, 2021. Soboba provided information that the project lies within two overlapping TCPs. Native peoples lived in this area into historic times until they were displaced by settlers. Some of the people moved to Pechanga and some to Soboba. Soboba recommended that an archaeologist and a Tribal Monitor be present during grading activities. Consultation was concluded with Soboba on June 09, 2021.

The Rincon Band of Luiseno Indians responded via email letter dated February 26, 2021. The letter indicated that the tribe considers the Project area part of their Traditional Use Area and stated further that the area is within or near a TCP. Rincon provided information that the Lake Elsinore area is considered a TCP and a Traditional Cultural Landscape (TCL) that is associated with the Luiseño creation. Rincon was provided with the cultural report on April 6, 2021.

No response was received from the Juaneno Band of Mission Indians Acjachemen Nation-Belardes, La Jolla Band of Luiseno Indians, Pala Band of Mission Indians, Pauma Band of Luiseno Indians, Quechan Tribe of the Fort Yuma Reservation, San Luis Rey Band of Mission Indians, or Santa Rosa Band of Cahuilla Indians.

The Pechanga Band of Luiseño Indians responded in an email letter dated February 12, 2021, stating that the Project is located within a TCP. During an April 27, 2021 consultation, Pechanga provided information regarding the North-West Lake Elsinore (Páayaxchi Nivé'wuna) TCP as follows:

“This TCP encompasses the area of Páayaxchi Nivé'wuna (Alberhill) and the region northwest, which includes Lee Lake and the southern portion of Temescal Valley. The two TCPs, Páayaxchi and Páayaxchi Nivé'wuna form a Traditional Cultural Landscape (TCL) and are connected through the Creation account. This is the place Wuyóot died and from here his body was taken back to 'Éxva Teméeku. This area known as Páayaxchi Nivé'wuna (NW Lake Elsinore) is directly tied to the Luiseño creation account. It is the location of Wuyóot's death, he was one of the most important First People. The earth is said to be stained red from Wuyóot's blood. The place names 'Anóomay, Qawúimay, and Páa'o' fall within the sacred lands boundary and contribute to the importance of this location.”

All the consulting tribes expressed concern that the Project area is sensitive for cultural resources and there is the possibility that previously unidentified resources might be found during ground disturbing activities. The Project would be subject to compliance with EIR Mitigation Measures 4.5-1 through 4.5-7, which requires a Tribal Monitor from the consulting Tribe(s) to be present during grading activities, and identifies the procedures to be followed should any unanticipated cultural resources be identified during ground disturbing activities in order to ensure that any uncovered resources are appropriately treated.

Additionally, and as required by EIR Mitigation Measures 4.5-8, the Project also would be required to adhere to State Health and Safety Code Section 7050.5 in the event that human remains are encountered and by ensuring that no further disturbance occur until the County Coroner has made the necessary findings as to origin of the remains. Furthermore, pursuant to Mitigation Measure 4.5-8 and Public Resources Code Section



5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made.

Notwithstanding, because mitigation measures are required, Project impacts to tribal cultural resources would be significant prior to implementation of the mitigation measures identified in EIR Subsection 4.5.

4.19.5 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development within western Riverside County. This study area was selected for evaluation because it encompasses a broad region with similar geological, biological, and climatic conditions.

As indicated under the analysis of Threshold a., the Project has the potential to result in impacts to previously-undiscovered Tribal Cultural Resources that may be present beneath the ground surface of the Project site. Other developments envisioned with buildout of the Riverside County General Plan and the general plans of cities within the County also have the potential to result in impacts to Tribal Cultural Resources, including sites or resources that may be buried beneath the ground surface. As such, Project impacts to Tribal Cultural Resources would be cumulatively considerable prior to mitigation.

4.19.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Significant Direct and Cumulatively-Considerable Impact. The Project has the potential to result in significant impacts to previously-undiscovered Tribal Cultural Resources, and could result in significant impacts to previously-identified Tribal Cultural Resources within the Project site in the absence of protective measures. As such, Project impacts to Tribal Cultural Resources represent a potentially significant impact for which mitigation would be required.

4.19.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- Unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code Section 6254 (r), parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code Section 6254 (r).



Mitigation

Mitigation Measures MM 4.5-1 through MM 4.5-8 shall apply (refer to EIR Subsection 4.5, *Cultural Resources*). The mitigation measures included in EIR Subsection 4.5 have been drafted to include all of the mitigation requirements requested during the Project's Tribal Consultation process. No additional mitigation measures are required.

4.19.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold a.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of EIR Mitigation Measures MM 4.5-1 through MM 4.5-8 would ensure appropriate treatment of any Tribal Cultural Resources that may be identified during Project-related ground-disturbing activities, including human remains. Implementation of the required mitigation would reduce Project impacts to Tribal Cultural Resources to below a level of significance.



4.20 UTILITIES AND SERVICE SYSTEMS

This Subsection evaluates the Project's potential to result in impacts on existing utilities and service systems and/or impacts to the environment that could result from the Project's proposed utilities and service system improvements. The analysis in this section is based in part upon the Elsinore Valley Municipal Water District (EVMWD) Urban Water Management Plan (UWMP), dated June 2016, which is herein incorporated by reference and is available for public review at the EVMWD, located at 31315 Chaney Street, Lake Elsinore, California 92531 (EVMWD, 2021a). The analysis in this Subsection also relies on a Water Supply Assessment (WSA) prepared by EVMWD for the proposed Project, which is dated September 7, 2021 and included as EIR *Technical Appendix M* (EVMWD, 2021b).

4.20.1 EXISTING CONDITIONS

The Project site is located within the service boundaries of the EVMWD for water and sewer service, Southern California Edison for electricity, and the Southern California Gas Company (SoCal Gas) for natural gas, with numerous service providers for cable television and telephone services. Solid waste hauling service to the Project site is provided by the Waste Management of the Inland Empire.

A. Water Service and Supply

Water service to the Project area is provided by the EVMWD. The EVMWD's service area encompasses approximately 96 square miles and includes the cities of Lake Elsinore and Canyon Lake, and portions of the cities of Wildomar, Murrieta, and unincorporated Riverside County and Orange County land. EVMWD's service area is divided into two divisions: the Elsinore Division and the Temescal Division. The Project site is located within the Elsinore Division, which makes up the majority of the service area with approximately 49,849 domestic water connections, encompassing an area of 96 square miles. (EVMWD, 2021a, p. 3-2)

The EVMWD has three primary sources of potable water supply: 1) local groundwater pumped from EVMWD-owned wells; 2) surface water from Canyon Lake Reservoir and treated by the Canyon Lake Water Treatment Plant; and 3) Imported water purchased from Metropolitan Water District (MWD) through Western Municipal Water District (WMWD). EVMWD plans to use these supplies to meet current and future demands under normal, single dry, and five consecutive dry years. EVMWD is also planning several projects to increase the reliability of its local water supplies, which include adding or replacing groundwater wells, purchasing raw imported water, and pursuing an indirect potable reuse (IPR) project. (EVMWD, 2021b, pp. 3-1 and 3-2)

EVMWD has a recycled water network that delivers non-potable recycled water to customers in four different service areas. EVMWD currently operates three water reclamation facilities (WRFs): Regional WRF, Horsethief Canyon WRF, and Railroad Canyon WRF. In addition, wastewater flow in the southern part of EVMWD's service area is treated at the Santa Rosa WRF, operated by the Santa Rosa Regional Resources Authority (SRRRA). Effluent from all of these WRFs meets Title 22 disinfected tertiary standards and can be used for non-potable water supply to EVMWD's recycled water system. (EVMWD, 2021a, p. 6-14)



Refer to EVMWD's 2020 UWMP and the Project's WSA (*Technical Appendix M*) for a complete discussion of water service and supply within the EVMWD (EVMWD, 2021a; EVMWD, 2021b).

B. Sewer Service and Treatment

The EVMWD Sewer District provides sewer service to the Project area. The "backbone" of the system consists of trunk sewers, generally 10 inches in diameter and larger, that convey the collected wastewater to EVMWD's Water Reclamation Facilities (WRFs). EVMWD's existing wastewater collection systems consist of approximately 358 miles of sewer mains up to 54 inches in diameter, 33 lift stations, and three WRFs. EVMWD's current service area is delineated into four separate collection systems. These are the Regional, Canyon Lake, Horsethief, and Southern collection systems. The flows conveyed in the Regional, Canyon Lake, and Horsethief collection systems are treated by EVMWD's Regional, Railroad Canyon, and Horsethief WRFs, respectively. The EVMWD Wastewater Management Plan makes recommendations for improvements, such as gravity sewer mains, force mains, lift stations, and wastewater treatment facilities. (Lake Elsinore, 2011b, p. 3.16-1)

Wastewater flows within the Project area are conveyed to the Horsethief Canyon WRF, located immediately off-site near the northwestern portion of the Project site. The Horsethief Canyon WRF treats an average flow of 0.36 million gallons per day (MGD), with a maximum daily flow of 0.55 MGD. The Horsethief Canyon WRF, which is currently undergoing an expansion to provide 0.8 MGD of treatment capacity, is currently rated to treat 0.5 MGD. (EVMWD, 2016, p. 6-17)

C. Stormwater Drainage

The Project site currently consists of vacant, undeveloped land is generally sloping down in northeasterly direction and is characterized by ridges and canyons, with the high point at approximately 1,430 feet above mean sea level (amsl) at the southwest corner of the Project site and a low point at approximately 1,187 feet amsl near the northeast corner of the Project site. As previously depicted on EIR Figure 4.10-2, and as summarized previously in EIR Table 4.10-1, there are a total of 11 drainage areas within the Project site. Flows from seven (7) of these drainages are conveyed northeasterly across the I-15 freeway via existing culverts, with flows discharging into the Temescal Wash and Alberhill Creek/Temescal Wash. The remaining four (4) drainages discharge directly into Alberhill Creek. Refer to EIR Subsection 4.10, *Hydrology and Water Quality*, for a description of the existing drainages on site. (K&A, 2020a, pp. 5-7)

D. Solid Waste Collection and Disposal

Solid waste collection and disposal is provided by the Riverside County Department of Waste Resources (RCDWR) through a franchise agreement with a private company, Waste Management Inc. of the Inland Empire (WMIE). Waste within the Project area is sent directly to the El Sobrante Landfill, which occurs 4.7 miles northwest of the Project site. Other landfills within the County that could handle solid waste generated by the Project include the Lamb Canyon Landfill and the Badlands Landfill. The following is a description of these facilities:



- El Sobrante Landfill. The El Sobrante Landfill is located in the southeast area of the City of Corona at 10910 Dawson Canyon Road and accessed from Interstate-15 (I-15) at Temescal Canyon Road. The landfill is operated and owned by USA Waste Services of California, Inc. of which WMIE is a subsidiary. The existing landfill encompasses 1,322 acres, of which 486 acres are permitted for refuse disposal. The landfill is currently permitted to receive 16,054 tons per day (tpd), and data from April 2020 shows that the El Sobrante Landfill received an average of 10,074 tons per day (including an average of 3,400 tons per day for in-County waste). If needed, 5,000 tpd must be reserved for waste produced within Riverside County, leaving the maximum commitment of non-Riverside County waste at 11,054 tpd. As of April 1, 2018, the landfill had a total remaining disposal capacity of 143,977,170 cubic yards. The El Sobrante Landfill is projected to reach capacity in 2051. (CalRecycle, n.d.)
- Lamb Canyon Landfill. The Lamb Canyon Landfill is located between the City of Beaumont and the City of San Jacinto at 16411 Lamb Canyon Road (State Route 79), south of Interstate 10 and north of Highway 74. The landfill is owned and operated by RCDWR. The landfill encompasses approximately 703.4 acres, of which approximately 144.6 acres are permitted for waste disposal. The landfill is currently permitted to receive 5,000 tpd and had an estimated total disposal capacity of approximately 38.9 million cubic yards. Data from April 2020 shows that the Lamb Canyon Landfill received approximately 1,940 tpd (including 1,924 tpd of in-County waste). As of January 8, 2015 (the most recent date for which data are available), the landfill had a total remaining capacity of approximately 19.2 million cubic yards. The current landfill remaining disposal capacity is estimated to last until approximately April 2029. (CalRecycle, n.d.)
- Badlands Landfill. The Badlands Landfill is located northeast of the City of Moreno Valley at 31125 Ironwood Avenue and accessed from State Highway 60 at Theodore Avenue. The landfill is owned and operated by RCDWR. The existing landfill encompasses 278 acres, of which 150 acres are permitted for refuse disposal. The landfill is currently permitted to receive 4,800 tpd. Data from April 2020 shows that the Badlands Landfill received an average of 2,729 tpd (including 2,045 tpd of in-County waste). As of January 1, 2015, the landfill had a total remaining disposal capacity of approximately 15.7 million cubic yards. The Badlands Landfill is projected to reach capacity at the earliest in 2022. (CalRecycle, n.d.)

4.20.2 APPLICABLE ENVIRONMENTAL REGULATIONS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to utilities and service systems.

A. Federal Regulations

1. Applicable Water Supply Regulations

Clean Water Act

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was



enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. (EPA, n.d.)

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) was established to protect the quality of drinking water in the U.S. This law focuses on all waters actually or potentially designed for drinking use, whether from above ground or underground sources. The Act authorizes EPA to establish minimum standards to protect tap water and requires all owners or operators of public water systems to comply with these primary (health-related) standards. The 1996 amendments to SDWA require that EPA consider a detailed risk and cost assessment, and best available peer-reviewed science, when developing these standards. State governments, which can be approved to implement these rules for EPA, also encourage attainment of secondary standards (nuisance-related). Under the Act, EPA also establishes minimum standards for state programs to protect underground sources of drinking water from endangerment by underground injection of fluids. (EPA, n.d.)

B. State Regulations

1. Applicable Water Supply Regulations

Water Conservation in Landscaping Act

The Water Conservation in Landscaping Act was established to ensure adequate water supplies are available for future uses. To promote the conservation and efficient use of water, the Act requires local agencies to adopt a water efficient landscape ordinance. When such an ordinance had not been adopted, a finding as to why (based on the climatic, geologic, or topographical conditions) such an ordinance is not necessary, must be adopted. In the absence of such an ordinance or findings, the policies and requirements contained in the "model" ordinance drafted by the State of California shall apply within the affected jurisdiction. (CA Legislative Info, n.d.)

Water Recycling in Landscaping Act

In 2000, Senate Bill 2095 (Water Recycling in Landscaping Act) was approved by Governor Davis requiring any local public or private entity that produces recycled water and determines that within 10 years it will provide recycled water within the boundaries of a local agency, to notify the local agency of that fact. In turn, local agencies are required to adopt and enforce within 180 days a specified recycled water ordinance, unless



the local agency adopted a recycled water ordinance or other regulation requiring the use of recycled water in its jurisdiction prior to January 1, 2001. (CA Legislative Info, n.d.)

Urban Water Management Planning Act

The Urban Water Management Planning Act (UWMP Act) was proposed and adopted to ensure that water planning is conducted at the local level, as the State of California recognized that two water agencies in the same region could have very different impacts from a drought. The UWMP Act requires water agencies to develop Urban Water Management Plans (UWMPs) over a 20-year planning horizon, and further required UWMPs to be updated every five years. UWMPs are exempt from compliance with CEQA. (DWR, 2016, p. 1-2)

The UWMPs provide a framework for long term water planning and inform the public of a supplier's plans for long-term resource planning that ensures adequate water supplies for existing and future demands. This part of the California Water Code (CWC) requires urban water suppliers to report, describe, and evaluate:

- Water deliveries and uses;
- Water supply sources;
- Efficient water uses;
- Demand management measures; and
- Water shortage contingency planning. (DWR, 2016, p. 1-3)

The UWMP Act has been modified over the years in response to the State's water shortages, droughts, and other factors. A significant amendment was made in 2009, after the drought of 2007-2009 and as a result of the governor's call for a statewide 20 percent reduction in urban water use by the year 2020. This was the Water Conservation Act of 2009, also known as SB X7-7. This Act required agencies to establish water use targets for 2015 and 2020 that would result in statewide savings of 20 percent by 2020. Beginning in 2016, retail water suppliers are required to comply with the water conservation requirements in SB X7-7 in order to be eligible for State water grants or loans. Retail water agencies are required to set targets and track progress toward decreasing daily per capita urban water use in their service area, which will assist the State in meeting its 20 percent reduction goal by 2020. (DWR, 2016, p. 1-2)

Government Code § 66473.7(b)(2) (Senate Bill 221)

Under Senate Bill (SB) 221, approval by a city or county of certain residential subdivisions requires an affirmative written verification of sufficient water supply. SB 221 is intended as a 'fail safe' mechanism to ensure that collaboration on finding the needed water supplies to serve a new large subdivision occurs before construction begins. SB 221 requires the legislative body of a city or county or the advisory agency, to the extent that it is authorized by local ordinance to approve, conditionally approve, or disapprove a tentative map, must include as a condition in any tentative map that includes a subdivision a requirement that a sufficient water supply shall be available. Proof of the availability of a sufficient water supply must be requested by the subdivision applicant or local agency, at the discretion of the local agency, and is based on written verification from the applicable public water system within 90 days of a request. SB 221 does not apply to any residential



project proposed for a site that is within an urbanized area and has been previously developed for urban uses, or where the immediate contiguous properties surrounding the residential project site are, or previously have been, developed for urban uses, or housing projects that are exclusively for very low and low-income households. (DWR, 2003; CA Legislative Info, n.d.)

California Senate Bill 610

The California Water Code (Water Code) §§ 10910 through 10915 were amended by the enactment of SB 610 in 2002. SB 610 requires an assessment of whether available water supplies are sufficient to serve the demand generated by a proposed project, as well as the reasonably foreseeable cumulative demand in the region over the next 20 years under average normal year, single dry year, and multiple dry year conditions. Under SB 610, water assessments must be furnished to local governments for inclusion in any environmental documentation for certain projects (as defined in Water Code 10912 [a]) subject to CEQA. (DWR, 2003; CA Legislative Info, n.d.) For the purposes of SB 610, “project” means any of the following:

- (1) A proposed residential development of more than 500 dwelling units.
- (2) A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
- (3) A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.
- (4) A proposed hotel or motel, or both, having more than 500 rooms.
- (5) A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
- (6) A mixed-use project that includes one or more of the projects specified in this subdivision.
- (7) A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project. (DWR, 2003; CA Legislative Info, n.d.)

Because the Project would entail the future development of up to 2,509,056 s.f. of light industrial and business park building area, a water supply assessment was required and is included in EIR *Technical Appendix M*.

CA. Water Code § 10610 et seq. (Senate Bill 901)

Signed into law on October 16, 1995, Senate Bill (SB) 901 required every urban water supplier to identify as part of its urban water management plan, the existing and planned sources of water available to the supplier over a prescribed 5-year period. The code requires the water service purveyor to assess the projected water demand associated with a proposed project under environmental review. Later provisions of SB 901 required compliance in the event that the proposed Project involved the adoption of a specific plan, amendment to, or revision of the land use element of a general plan or specific plan that would result in a net increase in the state population density. Upon completion of the water assessment, cities and counties may agree or disagree with the conclusions of the water service purveyors, but cannot approve projects in the face of documented water shortfalls without first making certain findings. (CA Legislative Info, n.d.)



Executive Order B-29-15

Executive Order (EO) B-29-15 ordered the State Water Resources Control Board (SWRCB) to impose restrictions to achieve a 25-percent reduction in potable urban water usage through February 28, 2016; directed the California Department of Water Resources (DWR) to lead a statewide initiative, in partnership with local agencies, to collectively replace 50 million square feet of lawns and ornamental turf with drought tolerant landscapes; and directed the California Energy Commission to implement a statewide appliance rebate program to provide monetary incentives for the replacement of inefficient household devices. (SWRCB, n.d.)

Executive Order B-37-16

Signed on May 9, 2016, EO B-37-16 established a new water use efficiency framework for California. The order bolstered the state's drought resilience and preparedness by establishing longer-term water conservation measures that include permanent monthly water use reporting, new urban water use targets, reducing system leaks and eliminating clearly wasteful practices, strengthening urban drought contingency plans, and improving agricultural water management and drought plans. (SWRCB, n.d.)

Executive Order B-40-17

Signed on April 7, 2017, EO B-40-17 ended the drought state of emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne, where emergency drinking water projects will continue to help address diminished groundwater supplies. It maintains water reporting requirements and prohibitions on wasteful practices. The order was built on actions taken in Executive Order B-37-16, which remains in effect. In a related action, state agencies, including the Department of Water Resources (DWR), released a plan to continue making water conservation a way of life. (SWRCB, n.d.)

Sustainable Groundwater Management Act (SGMA)

The Sustainable Groundwater Management Act (SGMA) established a new structure for managing California's groundwater resources at a local level by local agencies. SGMA required, by June 30, 2017, the formation of locally-controlled groundwater sustainability agencies (GSAs) in the State's high- and medium-priority groundwater basins and subbasins (basins). A GSA is responsible for developing and implementing a groundwater sustainability plan (GSP) to meet the sustainability goal of the basin to ensure that it is operated within its sustainable yield, without causing undesirable results. The GSP Emergency Regulations for evaluating GSPs, the implementation of GSPs, and coordination agreements were adopted by DWR and approved by the California Water Commission on May 18, 2016. (DWR, n.d.)

2. *Applicable Solid Waste Regulations*

California Solid Waste Integrated Waste Management Act (AB 939, 1989)

The Integrated Waste Management Act (IWMA) established an integrated waste management hierarchy to guide the California Integrated Waste Management Board (CIWMB) and local agencies in implementation, in order of priority: (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal (it should be noted that the CIWMB no longer exists, and its duties have been



assumed by CalRecycle). As part of the IWMA, the CIWMB was given a purpose to mandate the reduction of disposed waste. (CalRecycle, 2018a) The IWMA also required:

- the establishment of a task force to coordinate the development of city Source Reduction and Recycling Elements (SRREs) and a countywide siting element. (CalRecycle, 2018a)
- each city, by July 1, 1991, to prepare, adopt and submit a SRRE to the county which includes the following components: waste characterization; source reduction; recycling; composting; solid waste facility capacity; education and public information; funding; special waste (asbestos, sewage sludge, etc.); and household hazardous waste. (CalRecycle, 2018a)
- each county, by January 1, 1991, to prepare a SRRE for its unincorporated area, with the same components described above, and a countywide siting element, specifying areas for transformation or disposal sites to provide capacity for solid waste generated in the jurisdiction which cannot be reduced or recycled for a 15-year period.
- each county to prepare, adopt, and submit to the Board an Integrated Waste Management Plan (IWMP), which includes all of the elements described above. (CalRecycle, 2018a)
- each city or county plan to include an implementation schedule which shows: diversion of 25 percent of all solid waste from landfill or transformation facilities by January 1, 1995 through source reduction, recycling, and composting activities; and, diversion of 50 percent of all solid waste by January 1, 2000 through source reduction, recycling, and composting activities. (CalRecycle, 2018a)
- the CIWMB to review the implementation of each SRRE at least once every two years. (CalRecycle, 2018a)
- The IWMA required the CIWMB, in conjunction with an inspection conducted by a Lead Enforcement Agency (LEA), to conduct at least one inspection per year of each solid waste facility in the state. (CalRecycle, 2018a)

Additionally, the IWMA established a comprehensive statewide system of permitting, inspections, enforcement, and maintenance for solid waste facilities. (CalRecycle, 2018a)

Waste Reuse and Recycling Act (AB 1327)

The Waste Reuse and Recycling Act (WRRRA) required the CIWMB to approve a model ordinance for adoption by any local government for the transfer, receipt, storage, and loading of recyclable materials in development projects by March 1, 1993. The WRRRA also required local agencies to adopt a local ordinance by September 1, 1993 or allow the model ordinance to take effect. The WRRRA requires all development projects that are commercial, industrial, institutional, or marina in nature and where solid waste is collected and loaded, to



provide an adequate area for collecting and loading recyclable materials over the lifetime of the project. The area is required to be provided before building permits are issued. (CalRecycle, 2018b)

Mandatory Commercial Recycling Program (AB 341)

Assembly Bill (AB) 341 (Chapter 476, Statutes of 2011 [Chesbro, AB 341]) directed CalRecycle to develop and adopt regulations for mandatory commercial recycling. CalRecycle initiated formal rulemaking with a 45-day comment period beginning Oct. 28, 2011. The final regulation was approved by the Office of Administrative Law on May 7, 2012. AB-341 was designed to help meet California's recycling goal of 75% by the year 2020. AB 341 requires all commercial businesses and public entities that generate 4 cubic yards or more of waste per week to have a recycling program in place. In addition, multi-family apartments with five or more units are also required to form a recycling program. (CalRecycle, 2020)

2016 California Green Building Standards Code (CAL Green; Part 11 of Title 24, California Code of Regulations)

California Code of Regulations, Title 24, Part 11 is referred to as the California Green Building Standards Code (CALGreen Code). CALGreen became effective January 1, 2017, and is applicable to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure throughout the State of California (including residential structures and elementary schools). The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). Section 5.408.3 of the CALGreen Code requires that 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting from land clearing shall be reused or recycled. For a phased project, such material may be stockpiled on-site until the storage site is developed. Unless otherwise noted in the regulation, all newly constructed buildings in California are subject of the requirements of the CALGreen Code. (CEC, 2018)

3. *Applicable Energy Conservation Regulations*

California Energy Efficiency Standards for Residential and Nonresidential Buildings (24 CA. Code Regs. 6)

The Building Energy Efficiency Standards were first adopted in 1976 and have been updated periodically since then as directed by statute. In 1975 the Department of Housing and Community Development adopted rudimentary energy conservation standards under their State Housing Law authority that were a precursor to the first generation of the Standards. However, the Warren-Alquist Act was passed one year earlier with explicit direction to the Energy Commission (formally titled the State Energy Resources Conservation and Development Commission) to adopt and implement the Standards. The Energy Commission's statute created separate authority and specific direction regarding what the Standards are to address, what criteria are to be



met in developing the Standards, and what implementation tools, aids, and technical assistance are to be provided. (CEC, 2018)

The Standards contain energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. Public Resources Code Sections 25402 subdivisions (a)-(b) and 25402.1 emphasize the importance of building design and construction flexibility by requiring the Energy Commission to establish performance standards, in the form of an “energy budget” in terms of the energy consumption per square foot of floor space. For this reason, the Standards include both a prescriptive option, allowing builders to comply by using methods known to be efficient, and a performance option, allowing builders complete freedom in their designs provided the building achieves the same overall efficiency as an equivalent building using the prescriptive option. Reference Appendices are adopted along with the Standards that contain data and other information that helps builders comply with the Standards. (CEC, 2018)

The 2019 update to the Building Energy Efficiency Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. The most significant efficiency improvements to the residential Standards include the introduction of photovoltaic into the prescriptive package, improvements for attics, walls, water heating, and lighting. The most significant efficiency improvements to the nonresidential Standards include alignment with the ASHRAE 90.1 2017 national standards. The 2019 Standards also include changes made throughout all of its sections to improve the clarity, consistency, and readability of the regulatory language. (CEC, 2018)

Public Resources Code Section 25402.1 also requires the Energy Commission to support the performance standards with compliance tools for builders and building designers. The Alternative Calculation Method (ACM) Approval Manual adopted by regulation as an appendix of the Standards establishes requirements for input, output, and calculational uniformity in the computer programs used to demonstrate compliance with the Standards. From this, the Energy Commission develops and makes publicly available free, public domain building modeling software in order to enable compliance based on modeling of building efficiency and performance. The ACM Approval Manual also includes provisions for private firms seeking to develop compliance software for approval by the Energy Commission, which further encourages flexibility and innovation. (CEC, 2018)

California Solar Rights and Solar Shade Control Acts

The Solar Rights Act sets parameters for establishing solar easements, prohibits ordinances and private covenants which restrict solar systems, and requires communities to consider passive solar and natural heating and cooling opportunities in new construction. This Act is applicable to all California cities and counties. California’s solar access laws appear in the state’s Civil, Government, Health and Safety, and Public Resources Codes. California Pub Res Code § 25980 sets forth the Solar Shade Control Act, which encourages the use of trees and other natural shading except in cases where the shading may interfere with the use of active and passive solar systems. (EPIC, 2014; EPIC, 2010)



Alternative Fuels Plan

On September 24, 2009, the California Air Resources Board (CARB) adopted amendments to the “Pavley” regulations that reduce greenhouse gas (GHG) emissions in new passenger vehicles from 2009 through 2016. These amendments are part of California’s commitment toward a nation-wide program to reduce new passenger vehicle GHGs from 2012 through 2016. CARB’s September amendments will cement California’s enforcement of the Pavley rule starting in 2009 while providing vehicle manufacturers with new compliance flexibility. The amendments will also prepare California to harmonize its rules with the federal rules for passenger vehicles. (CARB, n.d.)

The U.S. EPA granted California the authority to implement GHG emission reduction standards for new passenger cars, pickup trucks, and sport utility vehicles On June 30, 2009. The first California request to implement GHG standards for passenger vehicles, known as a waiver request, was made in December 2005, and was denied by the U.S. EPA in March 2008. That decision was based on a finding that California’s request to reduce GHG emissions from passenger vehicles did not meet the Clean Air Act requirement of showing that the waiver was needed to meet “compelling and extraordinary conditions.” (CARB, n.d.)

The ARB’s Board originally approved regulations to reduce GHGs from passenger vehicles in September 2004, with the regulations to take effect in 2009. These regulations were authorized by the 2002 legislation Assembly Bill 1493 (Pavley). (CARB, n.d.)

The regulations had been threatened by automaker lawsuits and were stalled by the U.S. EPA’s delay in reviewing and then initially denying California’s waiver request. The parties involved entered a May 19, 2009 agreement to resolve these issues. With the granting of the waiver on June 30, 2009, it is expected that the Pavley regulations will reduce GHG emissions from California passenger vehicles by about 22 percent in 2012 and about 30 percent in 2016, all while improving fuel efficiency and reducing motorists’ costs. (CARB, n.d.)

The CARB has adopted a new approach to passenger vehicles – cars and light trucks – by combining the control of smog-causing pollutants and greenhouse gas emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California. (CARB, n.d.)

4.20.3 BASIS FOR DETERMINING SIGNIFICANCE

Section XIX of Appendix G to the State CEQA Guidelines addresses typical adverse effects to utilities and service systems, and includes the following threshold questions to evaluate a project’s impacts on utilities and service systems (OPR, 2018a):

- Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;



- Would the Project have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
- Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
- Would the Project 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; or
- Would the Project fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

The following thresholds are derived from Riverside County's Environmental Assessment Checklist, as modified by the 2018 updates to Appendix G to the State CEQA Guidelines, in order to evaluate the significance of the proposed Project's impacts on utilities and service systems. The proposed Project would result in a significant impact to utilities and service systems if the Project or any Project-related component would:

- 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;*
- b. *Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;*
- c. *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;*
- d. *Result in a determination by the wastewater treatment provider that serves or may service the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;*
- e. *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;*
- f. *Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan);*
- g. *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;*



- b. *Natural gas;*
- c. *Communications systems;*
- d. *Street lighting;*
- e. *Maintenance of public facilities, including roads; or*
- f. *Other governmental services.*

The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist, as modified/updated per the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project’s impacts to utilities and service systems.

4.20.4 IMPACT ANALYSIS

Threshold a.: Would the Project 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?

A. Water Service and Facilities

As described in EIR Subsection 3.5.3.E, the EVMWD would provide potable water service to the proposed Project. Water service would be provided via two (2) EVMWD Pressure Zones. As previously illustrated on EIR Figure 3-6, the northern portion of the proposed Project would be served by the 1434 Pressure Zone, while the central and southern portions of the proposed Project would be served by the 1601 Pressure Zone. A Pressure Reducing Station (PRS) is proposed on site as part of the Project. This PRS would serve as a second point of connection for the 1434 Pressure Zone to provide the required redundancy. The alignment of the on-site potable water system, and the location of the Pressure Reducing Station, would be determined by the ultimate alignment of Street A as part of future implementing projects (i.e., plot plans, etc.).

Potable water service from the 1434 Pressure Zone would be provided by a proposed off-site 12-inch water line in Horsethief Canyon Road from the Horsethief Canyon Road/Street A’ intersection northerly to connect with the existing 16-inch 1434 Zone water line, located immediately north of the I-15 Freeway. Potable water service from the 1601 Pressure Zone would be provided by connections to the existing 1601 Pressure Zone system at two (2) locations: one (1) point of connection at Abbeywood Drive at the Project site’s western boundary, and one (1) point of connection at Bolo Court at the southeastern boundary of the Project site. The precise alignment of the on-site piping system would be determined with the ultimate alignment of Street A as part of future implementing developments (i.e., plot plans, etc.). The on-site 1601 Pressure Zone water system would connect to the 1434 Pressure Zone system at the future PRS location, the precise location of which would be determined with the ultimate alignment of Street A.

Recycled water within the Project area is provided by the Horsethief Canyon Water Reclamation Facility (WRF), located off-site immediately west of the Project site. Recycled water from the Horsethief Canyon WRF is pumped to the 1518 Pressure Zone to serve the existing Horsethief Canyon Ranch community. The existing



recycled water system includes an 8-inch 1518 Pressure Zone recycled water line in Horsethief Canyon Road along the frontage of the Project site, and runs southeasterly along Mountain Road to connect the existing Horsethief 1601 Pressure Zone reservoir (located approximately 0.7-mile south of the Specific Plan). The 1518 Pressure Zone in the area does not connect to the 1801 Pressure Zone Reservoir. The Project's proposed recycled water system would include an 8-inch 1518 Pressure Zone Water Line within Street A, and a point of connection to the existing 8-inch 1518 Pressure Zone recycled water line within Horsethief Canyon Road. The alignment of the on-site recycled water system would be determined by the ultimate alignment of Street 'A' during implementing project(s).

The final alignment and endpoint of the proposed 8-inch Recycled Water line within proposed Planning Area 2 of SP 333A1 would be determined by the locations of landscape connections and meters of implementing project(s). The 1518 Pressure Zone is capable of supplying recycled water to the irrigation point of connection, but private pumps downstream of the irrigation meter may be required to provide suitable pressure for the landscape irrigation design. The private pumps for the 1518 Pressure Zone would provide a static pressure of approximately 60 psi at the anticipated point of connection elevation and elevations slope up from there to the Specific Plan's southern boundary.

Impacts associated with the above-described Project-related water facilities are inherent to the Project's construction phase, and impacts have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed water improvements. As such, with the mitigation measures specified in this EIR, Project impacts due to water improvements would be less than significant.

B. Wastewater Facilities

As described in EIR Subsection 3.5.3.E, all wastewater generated from the proposed Project would be conveyed to the Horsethief Canyon WRF for treatment and disposal, located off-site immediately to the west of the Project site. Two options for providing sewer service to the Project site are proposed as part of the Project. As previously illustrated on EIR Figure 3-8, the "primary" sewer plan for the Project proposes to convey sewer flows within the Project site through a proposed 8-inch gravity sewer line within Street A. A sewer lift station is proposed at the southeastern corner of the Horsethief Canyon Road and Street A intersection to lift these flows to a proposed 6-inch sewer force main in Horsethief Canyon Road, which would then flow southerly to discharge into the existing gravity sewer system and Horsethief Canyon WRF. The existing sewer lift station within the Horsethief Canyon Park would be abandoned and replaced with the Project's proposed on-site sewer lift station. The final location of the gravity sewer line within proposed Planning Area 2 of SP 333A1 would be determined by the ultimate alignment of Street A as part of future implementing developments (i.e., plot plans, etc.).

Depending on the timing of future implementing developments within proposed SP 333A1, and other planned developments in the area, a potential regional sewer lift station may be required approximately 0.5-mile



northwest of the Project site, located west of the Horsethief Canyon Ranch Specific Plan (Specific Plan No. 152) boundary and south of De Palma Road. In the case that the potential regional sewer lift station is constructed and operational prior to development of the proposed Project, then the on-site proposed sewer lift station located at the southeastern corner of the Street 'A' and Horsethief Canyon Road intersection would not be required, and an on-site and off-site gravity sewer system would be constructed to discharge the Project's sewage flows into the potential regional sewer lift station.

As previously illustrated on EIR Figure 3-9, as part of the alternative sewer plan gravity sewer lines ranging from 8 inches to 12 inches are proposed within Street 'A' to provide a sewer system from Bolo Court to Horsethief Canyon Road. The on-site sewer would convey flows northwesterly towards the off-site 12-inch gravity sewer line in Horsethief Canyon Road and the off-site 15-inch gravity sewer line in De Palma Road, and then would flow northwesterly in De Palma Road towards the potential regional lift station approximately 0.5-mile away from the Project site. Flows from the potential regional lift station would be lifted southeasterly in De Palma Road and then southerly in Horsethief Canyon Road to the existing Horsethief WRF.

Impacts associated with the above-described sewer improvements are inherent to the Project's construction phase, and impacts have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed sewer improvements that have not already been addressed by this EIR. As such, with the mitigation measures specified in this EIR, Project impacts due to sewer improvements would be less than significant.

C. Wastewater Treatment

As previously noted, wastewater generated by the proposed Project would be conveyed to the Horsethief Canyon WRF for treatment. The Horsethief Canyon WRF treats an average flow of 0.36 MGD, with a maximum daily flow of 0.55 MGD. The Horsethief Canyon WRF is currently rated to treat 0.5 MGD. However, the EVMWD is currently in the process of implementing improvements that would increase the capacity at the Horsethief Canyon WRF to 0.8 MGD. (EVMWD, 2016, p. 6-17)

As shown in Table 4.20-1, *Project-Related Wastewater Generation*, excluding areas proposed to be conserved as natural open space, at buildout the Project is anticipated to generate approximately 172,800 gallons per day (gpd) of wastewater requiring treatment (0.17 MGD), based on the rates used in EIR No. 521, which was prepared in conjunction with the County's 2015 General Plan Update. With implementation of the Project, and based on the maximum daily flows, the Horsethief Canyon WRF would receive up to 0.72 MGD requiring treatment (0.55 MGD maximum daily flows under existing conditions plus 0.17 MGD from the Project). Thus, with completion of the planned upgrades to the Horsethief Canyon WRF, the Horsethief Canyon WRF would have adequate capacity to treat wastewater generated by the Project and other existing developments. Accordingly, the Project would not result in or require the expansion of the existing facilities at the Horsethief Canyon WRF, and impacts would therefore be less than significant.



Table 4.20-1 Project-Related Wastewater Generation

Land Use	Acreage	Generation Factors	Wastewater Generation (gpd)
Industrial ¹	115.2 acres	1,500 gpd/acre	172,800
Total:	--	--	172,800

1. "Industrial" includes both proposed "Light Industrial" and "Business Park" land uses. (Riverside County, 2015, Table 4.19-BJ)

D. Storm Water Drainage System

EIR subsection 3.5.3.D provides a description of the Project’s proposed storm water drainage system. As conceptually illustrated on EIR Figure 3-5, all storm water drainage improvements would occur onsite within areas planned for development as part of SP 333A1. Impacts associated with the proposed drainage system are inherent to the Project’s construction phase, and impacts have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project’s impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project’s proposed storm drainage improvements. As such, with the mitigation measures specified in this EIR, Project impacts due to stormwater drainage improvements would be less than significant.

Threshold b.: Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

EVMWD is responsible for supplying potable and non-potable water within its service area. In June 2021, the EVMWD prepared and adopted its 2020 Urban Water Management Plan (UWMP) and Water Shortage Contingency Plan (WSCP) as required by the Urban Water Management Planning Act (UWMP Act). The UWMP provides water supply planning for a 25-year planning period in five-year increments and identifies water supplies needed to meet existing and future demands, and reports EVMWD's progress on water use efficiency targets as defined in the Water Conservation Act of 2009. The UWMP indicates that the EVMWD’s demand for water resources would be met through local groundwater pumped from EVMWD-owned wells, surface water from the Canyon Lake Reservoir, and imported water purchased from Metropolitan Water District (MWD) through the Western Municipal Water District (WMWD). (EVMWD, 2021a, p. ES-2)

To assess the ultimate effect of the Project’s water demands and service needs, the EVMWD has prepared a WSA for the Project (included as *Technical Appendix M* to this EIR), in accordance with Senate Bill 610 (SB 610) and Senate Bill 221 (SB 221). SB 610 requires the preparation of a water supply assessment report for projects that propose to construct the equivalent of 500 or more residential dwelling units. SB 221 requires affirmative written verifications of sufficient water supply. Provided below is a summary of EMWD’s water supplies and water demand projections based on the UWMP and the Project-specific WSA.

A. Water Demand

Over the past five years, EVMWD used an average of 23,200 acre feet per year (AFY) of potable water. As part of its Urban Water Management Plan (UWMP), EVMWD analyzed several scenarios for potential future



demands. Demands were developed using an annual growth rate of 1.5%, consistent with historical growth, and a population growth rate based on projections by the Southern California Association of Governments (SCAG). Both scenarios included an analysis based on gallons per capita per day (GPCD), and a 10% buffer was added to account for uncertainties. Ultimately, EVMWD elected to use a demand projection based on a 1.5% growth rate. The demand projections established in the 2020 Urban Water Management Plan (UWMP) include anticipated demand for planned developments. (EVMWD, 2021b, p. ES-1)

The 2015 EVWMD UWMP anticipated that the Project site would be developed with residential uses and was included in the 2015 UWMP demand estimates as well as the recently adopted 2020 UWMP. Previously, it was anticipated that development of the Project site would require 405 AFY to serve residential development. Based on the Project’s currently-proposed land uses (i.e., light industrial and business park), the Project is now expected to require 122 AFY. EVMWD has included this Project as a planned development within the demand projections established in the 2020 UWMP. The anticipated demands for the Project are shown in Table 4.20-2, *Project Area Demands*. (EVMWD, 2021b, pp. ES-1 and ES-2)

Table 4.20-2 Project Area Demands

LAND USE DESIGNATION	ACRES	2016 WATER MASTER PLAN	EXPECTED AVERAGE DAY DEMAND (GPD)	ANNUAL AVERAGE DEMAND (AFY)
		WATER DUTY FACTOR (GPD/ACRE)		
Business Park	18.0	1,200	21,600	24
Light Industrial	97.2	900	87,480	98
DEVELOPMENT TOTAL	115.2		109,080	122

(EVMWD, 2021b, Table ES-1)

B. Water Supplies

EVMWD utilizes three primary sources of potable water to meet demands, which include (EVMWD, 2021b, p. ES-2):

- Local groundwater pumped from EVMWD-owned wells throughout the Elsinore groundwater basin.
- Surface water from Canyon Lake Reservoir treated at the Canyon Lake Water Treatment Plant (CLWTP).
- Imported water purchased from the Metropolitan Water District of Southern California (Metropolitan) through Western Municipal Water District (Western).

EVMWD also produces recycled water for landscape and golf course irrigation. EVMWD plans to use these supplies to meet current and future demands under normal, single dry, and five consecutive dry years. EVMWD plans to utilize existing local sources prior to imported water. In addition, EVMWD has identified several projects to increase reliability in all years. Future projects include well replacement, construction of



new wells, treatment upgrades at CLWTP, and indirect potable reuse (IPR). EVMWD’s anticipated future supplies are shown in Table 4.20-3, *Projected Water Supplies (Acre-Feet)*. (EVMWD, 2021b, p. ES-2)

Table 4.20-3 Projected Water Supplies (Acre-Feet)

Water Supply	2025	2030	2035	2040	2045
Western/Metropolitan ¹	26,286	26,286	26,286	26,286	26,286
Raw Imported Water Western/Metropolitan ^{1,2}	0	3,700	3,700	3,700	3,700
Elsinore Valley Subbasin	5,500	5,500	5,500	5,500	5,500
Coldwater Subbasin	1,200	1,200	1,200	1,200	1,200
Bedford Subbasin	1,300	1,300	1,300	1,300	1,300
Lee Lake Subbasin	875	875	875	875	875
Palomar Well Replacement	450	450	450	450	450
Temecula-Pauba GW	0	0	750	750	750
Canyon Lake/CLWTP ³	2,500	2,500	2,500	2,500	2,500
IPR at Regional WRF ⁴	0	0	0	940	1,970
Temescal Wash and Lake Elsinore Replenishment ⁴	7,270	8,027	8,863	8,960	8,960
Metered Customers ⁵	1,459	1,459	1,459	1,459	1,459
Canyon Lake and Summerly Golf Course ⁵	378	378	378	378	378
TOTAL	47,219	51,675	53,261	54,298	55,328

¹ Imported water will be used to fill the gaps will be based on the availability of local supplies. EVMWD can purchase more water at an additional charge.
² Starting in 2026, EVMWD plans to start purchasing about 3,700 AFY of raw imported water from Western/Metropolitan for treatment at the CLWTP.
³ In settlement of litigation, EVMWD agreed not to treat more than 8,000 AFY of San Jacinto River flows in any water year at EVMWD’s CLWTP. This 8,000 AFY limit applies only to San Jacinto River runoff and excludes any imported water conveyed in the river channel.
⁴ In accordance with its NPDES permit, EVMWD is permitted to discharging 0.5 MGD to Temescal Wash and 7.5 MGD to Lake Elsinore. EVMWD is planning to use excess wastewater collected at the Regional WRF to implement an IPR project. It is anticipated that this water will be available between 2035 and 2040.
⁵ Includes recycled water produced by the three EVMWD WRFs and recycled water from SRRRA and Eastern.

(EVMWD, 2021b, Table ES-2)

C. Supply and Demand Comparison

EVMWD has a surplus of water to meet its projected demands, which include the anticipated demands for the Project when it was planned for residential development. The updated demands for the Project are lower than previously anticipated (122 AFY instead of 405 AFY), and therefore EVMWD’s supplies are adequate to provide the Project demands. EVMWD has a diverse supply portfolio that provides operational flexibility and reliability. In 2020, EVMWD relied on local groundwater to meet about 36% of the potable demands, promoted the use of recycled water to offset potable water needs, and imported water to meet any remaining demands.



EVMWD intends to continue promoting conservation, evaluating supplemental supplies, and participating in projects, when feasible, to ensure EVMWD’s water supply sources are protected and sustainable throughout the future. To mitigate and adapt to unpredictable conditions, EVMWD will continue to diversify its local water supply portfolio. (EVMWD, 2021b, pp. ES-3 and ES-4)

D. Conclusion

Based on the foregoing analysis and the analysis provided in the Project’s WSA (*Technical Appendix M*), the EVMWD would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, impacts would be less than significant.

Threshold c.: Would the Project 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?

As discussed under the analysis of Threshold a., the Project would be provided sanitary sewer service by the EVMWD, and no septic tanks are proposed as part of the Project. A description of proposed sewer improvements is provided in EIR subsection 3.5.3.E and are depicted on EIR Figures 3-8 and 3-9. As discussed therein, two options for providing sewer service to the Project site are proposed as part of the Project. The “primary” sewer plan for the Project proposes to convey sewer flows within the Project site through a proposed 8-inch gravity sewer line within Street A. A sewer lift station is proposed at the southeastern corner of the Horsethief Canyon Road and Street A intersection to lift these flows to a proposed 6-inch sewer force main in Horsethief Canyon Road, which would then flow southerly to discharge into the existing gravity sewer system and Horsethief Canyon WRF. The existing sewer lift station within the Horsethief Canyon Park would be abandoned and replaced with the Project’s proposed on-site sewer lift station. The final location of the gravity sewer line within proposed Planning Area 2 of SP 333A1 would be determined by the ultimate alignment of Street A as part of future implementing developments (e.g., plot plans, conditional use permits).

Depending on the timing of future implementing developments within proposed SP 333A1, and other planned developments in the area, a potential regional sewer lift station may be required approximately 0.5-mile northwest of the Project site, located west of the Horsethief Canyon Ranch Specific Plan (Specific Plan No. 152) boundary and south of De Palma Road. In the case that the potential regional sewer lift station is constructed and operational prior to development of the proposed Project, then the on-site proposed sewer lift station located at the southeastern corner of the Street ‘A’ and Horsethief Canyon Road intersection would not be required, and an on-site and off-site gravity sewer system would be constructed to discharge the Project’s sewage flows into the potential regional sewer lift station.

As part of the alternative sewer plan gravity sewer lines ranging from 8 inches to 12 inches are proposed within Street ‘A’ to provide a sewer system from Bolo Court to Horsethief Canyon Road. The on-site sewer would convey flows northwesterly towards the off-site 12-inch gravity sewer line in Horsethief Canyon Road and the off-site 15-inch gravity sewer line in De Palma Road, and then would flow northwesterly in De Palma Road towards the potential regional lift station approximately 0.5-mile away from the Project site. Flows from the



potential regional lift station would be lifted southeasterly in De Palma Road and then southerly in Horsethief Canyon Road to the existing Horsethief WRF.

Impacts associated with the Project’s proposed sewer improvements are inherent to the Project’s construction phase, and impacts have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project’s impacts to the maximum feasible extent. Additionally, physical impacts associated with the construction of the regional sewer lift station were previously evaluated as part of a Mitigated Negative Declaration (MND) prepared for Tentative Tract Map No. 31674 (Riverside County Environmental Assessment No. 39193). Environmental Assessment No. 39193 is herein incorporated by reference, and is available for review at the Riverside County Planning Department 4080 Lemon Street, 12th Floor, Riverside, CA 92501. There are no environmental impacts that would occur specifically related to the Project’s proposed sewer improvements (including the potential off-site sewer lift station) that have not already been addressed in pertinent sections of this EIR and/or in Environmental Assessment No. 39193. As such, with the mitigation measures specified in this EIR and/or in Environmental Assessment No. 39193, Project impacts due to proposed sewer improvements would be less than significant.

Threshold d.: Would the Project 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?

As discussed under the analysis of Threshold a., wastewater generated by the Project would be conveyed to the Horsethief Canyon WRF. The Horsethief Canyon WRF treats an average flow of 0.36 MGD, with a maximum daily flow of 0.55 MGD. The Horsethief Canyon WRF is currently rated to treat 0.5 MGD. However, the EVMWD is currently in the process of implementing improvements that would increase the capacity at the Horsethief Canyon WRF to 0.8 MGD. The planned improvements are anticipated to be online by the summer of 2023. As previously shown in Table 4.20-1, at buildout the Project is anticipated to generate approximately 172,800 gpd of wastewater requiring treatment (0.17 MGD). With implementation of the Project, and based on the maximum daily flows, the Horsethief Canyon WRF would receive up to 0.72 MGD requiring treatment (0.55 MGD maximum daily flows under existing conditions plus 0.17 MGD from the Project). Thus, with completion of the planned upgrades to the Horsethief Canyon WRF, the Horsethief Canyon WRF would have adequate capacity to treat wastewater generated by the Project and other existing developments. Accordingly, the Project would not result in a determination by the wastewater treatment provider (EVMWD) that it has inadequate capacity to serve the Project’s projected demand in addition to the provider’s existing commitments, and impacts would therefore be less than significant. (EVMWD, 2016, p. 6-17)



Threshold e.: Would the Project 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?

Solid waste generated by the Project would be disposed of at the El Sobrante Landfill, although the Lamb Canyon Landfill and the Badlands Landfill also could handle solid waste generated by the Project. The El Sobrante Landfill is permitted to receive 16,054 tpd, and data from April 2020 shows that the El Sobrante Landfill received an average of 10,074 tons per day (including an average of 3,400 tons per day for in-County waste) (CalRecycle, n.d.). The Lamb Canyon Landfill is permitted to receive 5,000 tpd, and data from April 2020 shows that the Lamb Canyon Landfill received approximately 1,940 tpd (including 1,924 tpd of in-County waste) (CalRecycle, n.d.). The Badlands Landfill is permitted to receive 4,800 tpd, and data from April 2020 shows that the Badlands Landfill received an average of 2,729 tpd (including 2,045 tpd of in-County waste) (CalRecycle, n.d.).

As shown in Table 4.20-4, *Project Solid Waste Generation*, buildout and occupancy of the Project is estimated to produce approximately 74.2 tons per day (tpd) of solid waste, or approximately 27,098 tons per year (tpy). Per the Riverside Countywide Integrated Waste Management Plan (CIWMP), which applies to the Project, up to 50 percent of its solid waste would need to be diverted from area landfills. In conformance with the CIWMP, the Project Applicant is required to work with future contract refuse haulers to implement recycling and waste reduction programs for solid wastes.

Table 4.20-4 Project Solid Waste Generation

Land Use	Square Footage (s.f.)	Generation Factors	Total Solid Waste Generated (tpy)	Average Solid Waste per Day (tpd)
Industrial	2,509,056 s.f.	10.8 tons/1,000 s.f.	27,098 tpy	74.2 tpd
Totals:	2,509,056 s.f.	--	27,098 tpy	74.2 tpd

1. "Industrial" includes both Light Industrial and Business Park land uses.
Notes: s.f. = square feet; tpy = tons per year; tpd = tons per day.
(Riverside County, 2015, Table 4.17-N)

As noted, due to the proximity of the El Sobrante Landfill to the Project site, it is expected that solid waste generated by the Project would be disposed of at this facility. The El Sobrante Landfill has a permitted disposal capacity of 16,054 tpd. The Project's 74.2 tpd of solid waste would represent 0.46% of the permitted daily disposal capacity at the El Sobrante Landfill. Additionally, the Lamb Canyon Landfill has a permitted disposal capacity of 5,000 tpd, and the Badlands Landfill has a permitted disposal capacity of 4,800 tpd. The Project's solid waste generation would represent 1.48% of the daily disposal capacity at the Lamb Canyon Landfill and 1.55% of the daily disposal capacity at the Badlands Landfill. Because the Project would generate a relatively small amount of solid waste per day, as compared to the permitted daily capacities for the El Sobrante Landfill, Lamb Canyon Landfill, and Badlands Landfill, it is anticipated that these regional landfill facilities would have sufficient daily capacity to accept solid waste generated by the Project. As such, because regional solid waste facilities would have adequate capacity to handle solid waste generated by the Project's construction and operational phases, impacts would be less than significant.



Threshold f.: Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?

The proposed Project would be regulated by the Riverside Countywide Integrated Waste Management Plan (RCWRMD, 1996). The CIWMP outlines goals, policies, and programs Riverside County and its cities would implement to create an integrated and cost-effective waste management system that complies with the provisions of AB 939 and its diversion mandates. Additionally, AB 341 made a legislative declaration that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, although the California Department of Resources Recycling and Recovery may not establish or enforce a diversion rate greater than the 50 percent diversion rate as set forth by the CIWMP (per Public Resources Code § 41780.01[b]).

The proposed Project would be regulated by the RCDWR and would be required to comply with the CIWMP's requirement to divert up to 50 percent of its solid waste from area landfills. In conformance with the CIWMP, the Project Applicant is required to work with future contract refuse haulers to implement recycling and waste reduction programs for solid wastes. Implementation of a waste disposal strategy for the proposed Project would assist Riverside County in achieving the mandated goals of the Integrated Waste Management Act by developing feasible waste programs that encourage source reduction, recycling, and composting. The RCDWR is specifically charged with the responsibility of implementing programs that ensure that unincorporated Riverside County achieves 50% diversion of solid waste from landfill disposal as well as monitoring and reporting unincorporated Riverside County's compliance with CIWMB and AB 939. With mandatory compliance to AB 939, AB 341, and RCDWR's programs and policies, the Project would result in a less-than-significant impact due to a conflict with federal, State, and local management and reduction statutes and regulations related to solid wastes, including the CIWMP.

Threshold g.: 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:

- 1. Electricity;***
- 2. Natural Gas;***
- 3. Communications systems;***
- 4. Street lighting;***
- 5. Maintenance of public facilities, including roads; or***
- 6. Other governmental services?***

Electric service is currently available to the proposed Project site through Southern California Edison (SCE), although existing facilities would need to be expanded as necessary to provide service to the Project. However, the Project area already is served by existing electrical lines; therefore, the construction of electricity facilities



as necessary to serve the proposed Project would occur within the areas already planned for impact by the Project or within existing, improved roadways. Therefore, the construction of electrical facilities necessary to serve the proposed Project would not result in any significant impacts to the environment that are not already addressed by this EIR. No additional mitigation would be required.

There are no anticipated capacity restrictions which could limit the ability of the SoCal Gas Company to provide service to the proposed Project. Points of connection to SoCal Gas Company main lines would be resolved as the proposed Project and other projects planned for the area commence their utility design and interconnection plans. It is anticipated that construction of any off-site natural gas utility connections would occur within existing disturbed public rights-of-way. As such, the construction of these utility connections is evaluated under the appropriate subject headings within this EIR, and no new impacts would occur specifically related to natural gas service that have not already been addressed.

Due to long-range planning efforts by the energy purveyors, Project implementation is not anticipated to result in the need for the construction or expansion of off-site gas generation facilities, although some new distribution lines would be necessary (as discussed above). Any future need for regional energy facilities related to cumulative growth in the service areas of SoCal Gas would be determined by the service agencies as part of their long-range growth projections. Accordingly, provision of gas service to the proposed Project site would not result in any significant environmental impacts not already addressed under relevant sections of this EIR.

Points of connection to telecommunication facilities would be resolved as the proposed Project and other projects planned for the area commence their utility design and interconnection plans. It is anticipated that any off-site construction of communication utility connections would occur within existing disturbed public rights-of-way. As such, the construction of communication utility connections is evaluated under the appropriate subject headings within this EIR. No environmental impacts would occur from the provision of these utilities, as all lines would be installed within the disturbance areas of existing roadway rights-of-way and/or on site within areas already planned for physical impacts as part of the Project.

The Project would require a number of drainage features on site, including a series of catch basins and detention and water quality basins proposed throughout the Project site. Following water quality treatment, the treated runoff would be conveyed to existing culverts beneath the I-15 and would discharge into the Temescal Wash. Runoff from off-site areas tributary to the Project site would be conveyed by a proposed storm drain to existing natural drainages. However, the proposed drainage improvements would be located in on-site areas, impacts to which have been evaluated throughout this EIR, and mitigation is identified where necessary to reduce impacts to a level below significance. Therefore, the construction of storm water drainage facilities needed to serve the Project would not result in any impacts to the environment beyond what is evaluated, disclosed, and mitigated by other sections of this EIR. Additional mitigation would not be required.

The Project would provide street lighting as required by the County in accordance with Ordinance No. 461 (Roadway Standards) and Ordinance No. 460 (Subdivision of the Land) along proposed Street A. All physical environmental impacts associated with street lighting and maintenance would occur within the boundaries of



the on-site improvement areas, the impacts of which are described throughout this EIR. Therefore, no additional impacts to the environment would occur that are not already addressed by this EIR, and additional mitigation would not be required.

Implementation of the proposed Project would result in improvements to Street A on site as well as at the intersection of Street A and Horsethief Canyon Road. Street A would require maintenance by the County. Maintenance of Street A would not result in any significant impacts to the environment. Impacts associated with the proposed improvements to Street A already are evaluated in appropriate sections of this EIR, and any identified impacts have been mitigated to the maximum feasible extent. Maintenance of Street A would be funded through the Project developer's payment of Development Impact Fees (DIF) and future building owners' payment of property taxes. Therefore, the maintenance of proposed Street A would not result in any new impacts to the environment beyond that which is already disclosed and mitigated by this EIR, and a less-than-significant impact would occur.

No known other facilities would require off-site construction or maintenance as a result of the proposed Project.

Based on the foregoing analysis, impacts associated with the construction or expansion of utility facilities would be less than significant or otherwise mitigated to the maximum feasible extent by this EIR. No additional mitigation would be required.

4.20.5 CUMULATIVE IMPACT ANALYSIS

The cumulative study area used for the analysis of water and wastewater includes areas within EVMWD's service area for water and wastewater services, and is based on the buildout of the County General Plan and the general plans of cities within EVMWD's service area. The cumulative study area for solid waste comprises western Riverside County, as all areas of western Riverside County are served by WMIE, and is based on the buildout of the County General Plan and the general plans of cities within western Riverside County. For the remaining issue areas, the cumulative impact analysis considers development of the Project in conjunction with other development projects and planned development in the vicinity of the Project site.

As discussed under the analysis of Threshold a., the Project would require a number of improvements related to water, wastewater treatment, and storm drainage systems, although such improvements are inherent to the Project's construction phase. Cumulatively-considerable impacts associated with Project construction activities have been evaluated throughout this EIR, and where necessary mitigation measures have been identified to reduce the Project's cumulatively-considerable effects to the maximum feasible extent. There are no components of the Project's proposed water, wastewater, or storm drainage systems that could result in impacts not already evaluated by other sections of this EIR. Accordingly, cumulatively-considerable impacts associated with the construction of new or expanded water, wastewater treatment, and stormwater drainage systems would be less than significant.

The analysis of Threshold b. demonstrates that the EVMWD would have sufficient water supplies available to serve the Project as well as other reasonably foreseeable future development during normal, dry, and multiple



dry years. The EVMWD UWMP evaluates the water demands of both the Project and other cumulative developments within EVMWD's service area, and the Project is within the growth assumptions utilized in the UWMP. Because the UWMP demonstrates that the EVMWD has the capacity to serve future development within its service area, cumulatively-considerable impacts to water supply would be less than significant.

As discussed under the analysis of Threshold c., the Project would require a number of improvements to provide sewer service to the Project site, although impacts associated with such improvements are inherent to the Project's construction phase. Cumulatively-considerable impacts associated with Project construction activities have been evaluated throughout this EIR, and where necessary mitigation measures have been identified to reduce the Project's cumulatively-considerable effects to the maximum feasible extent. There are no components of the Project's proposed wastewater improvements that would result in impacts not already evaluated by other sections of this EIR. Accordingly, cumulatively-considerable impacts associated with the construction of new or expanded wastewater treatment conveyance facilities would be less than significant.

As indicated under the analysis of Threshold d., the EVMWD is currently in the process of implementing improvements that would increase the capacity at the Horsethief Canyon WRF to 0.8 MGD. As previously shown in Table 4.20-1, at buildout the Project is anticipated to generate approximately 172,800 gpd of wastewater requiring treatment (0.17 MGD). With implementation of the Project, and based on the maximum daily flows, the Horsethief Canyon WRF would receive up to 0.72 MGD requiring treatment (0.55 MGD maximum daily flows under existing conditions plus 0.17 MGD from the Project). Thus, with completion of the planned upgrades to the Horsethief Canyon WRF, the Horsethief Canyon WRF would have adequate capacity to treat wastewater generated by the Project and other existing and planned developments. Although the Project and other cumulative developments ultimately may contribute to the need for expanded capacity at the Horsethief Canyon WRF, impacts associated with such expansion would be subject to CEQA once plans for such expansion have been prepared by the EVMWD. As no such plans are currently available, it would be speculative to evaluate potential cumulatively-considerable impacts associated with the proposed expansion (State CEQA Guidelines § 15145). As such, cumulatively-considerable impacts due to wastewater capacity would be less than significant.

As previously discussed in the analysis provided under Threshold e., solid waste generated by construction and operation of the Project would represent small proportions of the daily disposal capacity at the El Sobrante Landfill, Lamb Canyon Landfill, and/or Badlands Landfill. The landfills are currently projected to remain open until as far into the future as 2051 (El Sobrante Landfill) and have sufficient daily capacity to handle solid waste generated by the Project and other cumulative developments both during construction and long-term operation. The Project would not directly result in the need for expanded solid waste disposal facilities, as the El Sobrante Landfill, Lamb Canyon Landfill, and Badlands Landfill have sufficient existing capacity to handle solid waste generated by the Project. Rather, the Project's incremental contribution to solid waste generation may contribute to an ultimate need for expanding the solid waste disposal facilities that would serve the Project and/or the construction of additional solid waste disposal facilities. Moreover, it is possible that as other developments in the region are proposed, the RCDWR and WMIE may opt to construct new solid waste disposal facilities to serve those developments, and such facilities may or may not receive solid waste generated by the Project. Although the Project has the potential to cumulatively contribute to the demand for



new/expanded solid waste disposal facilities, the construction of which could significantly impact the environment, it is too speculative for evaluation in the absence of a proposed expansion or development plan (State CEQA Guidelines § 15145). Therefore, the Project's cumulatively-considerable impacts to solid waste disposal facilities would be less than significant.

The Project would adhere to regulations set forth by local and state regulations (including AB 341 and AB 939) during both construction and long-term operations. Other cumulative developments would also be required to comply with such regulations. As such, the Project as well as other cumulative developments in the area would not result in cumulative impacts with respect to compliance with federal, State, and local statutes and regulations related to solid wastes. Cumulatively-considerable impacts would be less than significant.

Cumulative impacts associated with the provision of facilities for electricity, natural gas, communications systems, storm water drainage, street lighting, maintenance of facilities, construction of off-site sewer and water lines, and other governmental services are evaluated throughout the appropriate issue areas in this EIR. In all cases, where cumulatively-considerable impacts associated with any Project component are identified, mitigation measures have been imposed to reduce such impacts to the maximum feasible extent. Accordingly, cumulatively-considerable impacts associated with the provision of utility facilities to serve the proposed Project would be less than significant.

4.20.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Less-than-Significant Impact. Although the Project would require construction of new or expanded water, wastewater conveyance, and storm water drainage systems, impacts associated with the construction of such facilities have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed water, sewer, and drainage improvements that have not already been addressed. As such, with the mitigation measures specified in this EIR, Project impacts due to water, sewer, and drainage improvements would be less than significant. Additionally, Horsethief Canyon WRF would have adequate capacity to treat wastewater generated by the proposed Project. Accordingly, the Project would not result in or require the expansion of the existing facilities at the Horsethief Canyon WRF, and impacts would therefore be less than significant.

Threshold b.: Less-than-Significant Impact. The UWMP demonstrates that the EVMWD would have sufficient water supplies even during single and multiple dry years to meet the projected demand within its district through year 2045. Because the Project's anticipated water demand would be within the demand projections identified by the UWMP, it can be concluded that the EVMWD would have sufficient water supplies to serve the Project based on existing entitlements and resources. Additionally, the Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, impacts associated with the Project's water demand would be less than significant.



Threshold c.: Less-than-Significant Impact. Impacts associated with the Project's proposed sewer improvements are inherent to the Project's construction phase, and impacts have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed sewer improvements that have not already been addressed in pertinent sections of this EIR. As such, with the mitigation measures specified in this EIR, Project impacts due to proposed sewer improvements would be less than significant.

Threshold d.: Less-than-Significant Impact. The EVMWD is currently in the process of implementing improvements that would increase the capacity at the Horsethief Canyon WRF to 0.8 MGD. With implementation of the Project, and based on the maximum daily flows, the Horsethief Canyon WRF would receive up to 0.72 MGD requiring treatment (0.55 MGD maximum daily flows under existing conditions plus 0.17 MGD from the Project). Thus, with completion of the planned upgrades to the Horsethief Canyon WRF, the Horsethief Canyon WRF would have adequate capacity to treat wastewater generated by the Project and other existing and planned developments. As such, Project impacts due to wastewater capacity would be less than significant.

Threshold e.: Less-than-Significant Impact. Regional solid waste facilities would have adequate capacity to handle solid waste generated by the Project's construction and operational phases. The Project would not 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. Accordingly, impacts would be less than significant.

Threshold f.: Less-than-Significant Impact. With mandatory compliance to AB 939, AB 341, and RCDWR's programs and policies, the Project would not result in a significant impact due to noncompliance with regulations related to solid waste. A less-than-significant impact would occur.

Threshold g.: Less-than-Significant Impact. Impacts associated with the construction or expansion of utility facilities would be less than significant or otherwise mitigated to the maximum feasible extent by this EIR. No additional mitigation would be required.

4.20.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.



- The Project is required to comply with the provisions of the California Solid Waste Integrated Waste Management Act, (AB 939, 1989) which mandates a reduction of disposed waste throughout California.
- The Project is required to comply with the provisions of the California Solid Waste Reuse and Recycling Act (AB 1327) which developed a model ordinance for adoption of recyclable materials in development projects. This Act requires all development projects that are commercial, industrial, institutional, or marina in nature and where solid waste is collected and loaded, to provide an adequate area for collecting and loading recyclable materials over the lifetime of the project. The area is required to be provided before building permits are issued.
- The Project is required to comply with the provisions of the Mandatory Commercial Recycling Program (AB 341). AB 341 made a legislative declaration that it is the policy goal of the State that not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020, and required the Department of Resources Recycling and Recovery, by January 1, 2014, to provide a report to the Legislature that provides strategies to achieve that policy goal and also includes other specified information and recommendations.
- The Project would be subject to the following applicable standard conditions of approval imposed on the Project by the RCDWR:
 - Prior to issuance of a building permit, a Waste Recycling Plan (WRP) shall be submitted to the Riverside County Department of Waste Resources for approval. At a minimum, the WRP must identify the materials (i.e., cardboard, concrete, asphalt, wood, etc.) that will be generated by construction and development, the projected amounts; the measures/methods that will be taken to recycle, reuse, and/or reduce the amount of materials; the facilities and/or haulers that will be utilized; and the targeted recycling or reduction rate. During Project construction, the Project site shall have, at a minimum, two (2) bins: one for waste disposal and the other for the recycling of Construction and Demolition (C&D) materials. Additional bins are encouraged to be used for further source separation of C&D recyclable materials. Accurate record keeping (receipts) for recycling of C&D recyclable materials and solid waste disposal must be kept. Arrangements can be made through the franchise hauler.
 - Prior to final building inspection, evidence (i.e., receipts or other type of verification) to demonstrate Project compliance with the approved WRP shall be presented by the Project proponent to the Planning Division of the Riverside County Department of Waste Resources in order to clear the Project for occupancy permits. Receipts must clearly identify the amount of waste disposed and Construction and Demolition (C&D) materials recycled.
 - Hazardous materials are not accepted at Riverside County landfills. In compliance with federal, state, and local regulations and ordinances, any hazardous waste generated in association with the Project shall be disposed of at a permitted Hazardous Waste disposal facility. Hazardous waste materials include, but are not limited to, paint, batteries, oil, asbestos, and solvents.



Mitigation

The mitigation measures identified throughout this EIR for Project-related construction impacts (e.g., air quality, biological resources) shall apply. Project impacts to utilities and service systems would be less than significant; therefore, no additional mitigation is required related to utilities and service system improvements proposed as part of the Project.



4.21 WILDFIRE

Information in this Subsection is also based in part on a technical study for wildfire protection titled, “Draft Fire Protection Plan, Renaissance Ranch Commerce Center” (herein, “FPP”), prepared by Dudek, dated March 2021, and included as *Technical Appendix N* (Dudek, 2021). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.21.1 EXISTING CONDITIONS

A. Fire Hazard Classification

Under existing conditions, the Project site consists of vacant and undeveloped land with natural vegetation covering a majority of the site. Areas to the north of the Project site (and south of I-15) also comprise undeveloped lands with natural vegetation, with undeveloped and natural vegetation areas also occurring to the east of the site. Areas to the west and south of the Project site are developed with medium density residential uses, and vegetation in these areas are limited to irrigated ornamental landscaping. According to Riverside County GIS, and as shown on Figure 4.21-1, *Wildfire Susceptibility*, a majority of the Project site is classified as having a “Very High” susceptibility to wildland fire hazards, while the northwest portions of the Project site are classified as having a “High” susceptibility to wildland fire hazards. Areas to the north and east of the Project site also are classified as having a “Very High” susceptibility to wildland fire hazards, with areas northwest of the Project site identified as having a “High” susceptibility to wildland fire hazards. The residential areas located west and south of the Project site are not identified as being susceptible to wildland fire hazards. (RCIT, 2021)

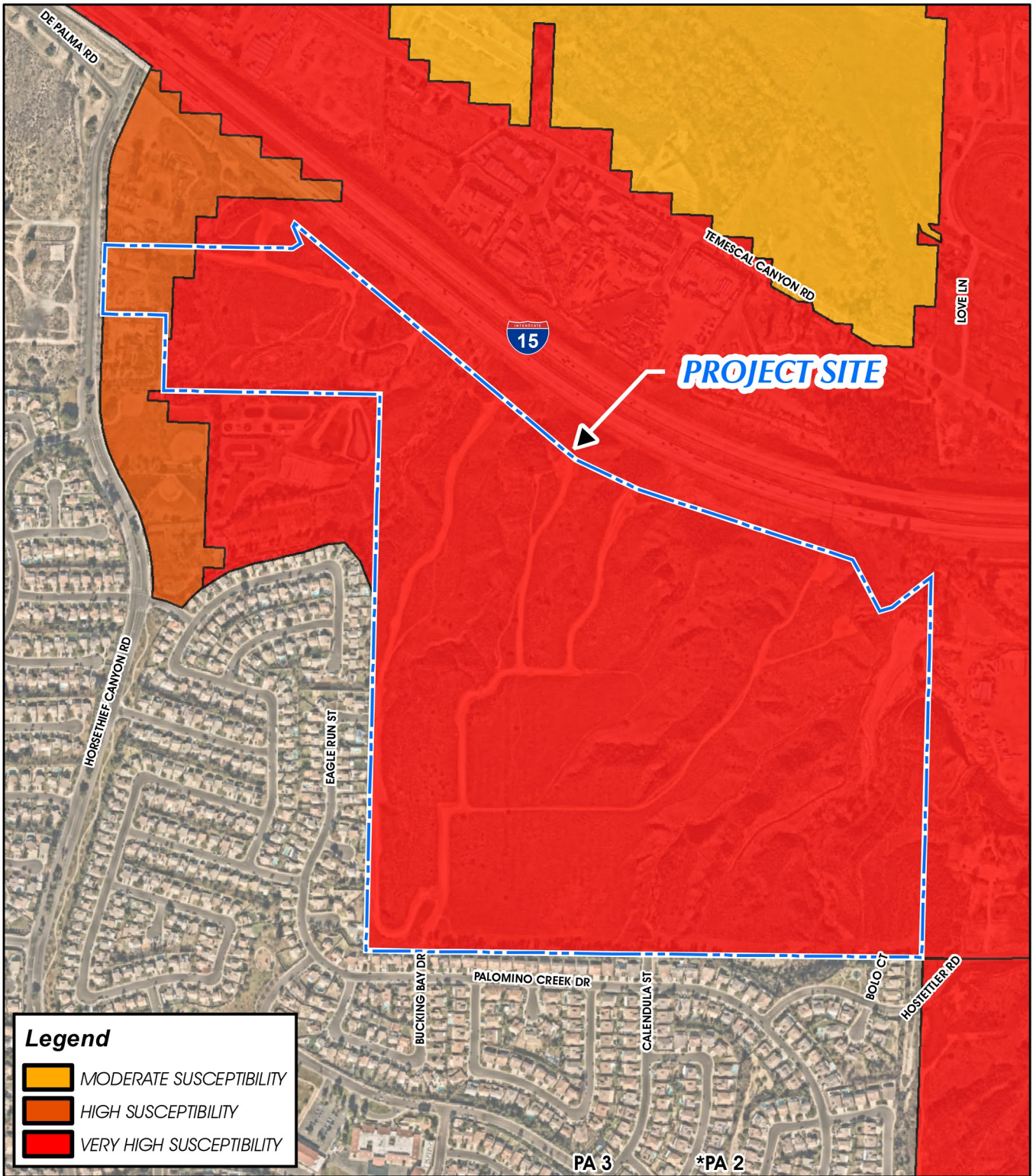
B. Topography

As previously shown on EIR Figure 2-8, the southwestern portions of the Project site exhibit relatively level topography, with the remaining portions of the site containing undulating small hillforms. The property descends at a moderate gradient, generally in a northeasterly direction. Elevations on site range from approximately 1,187 feet above mean sea level (amsl) near the northeast corner of the Project site to 1,430 feet amsl at the southwest corner of the Project site. The overall topographic relief is approximately 243 feet. (Google Earth, 2018; Petra, 2020, p. 2)

C. Climate

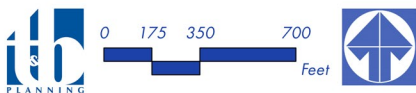
Throughout southern California, and specifically at the Project site, climate has a large influence on fire risk. The climate of Riverside County is typical of a Mediterranean area, with warm, dry summers and cold, wet winters. Temperatures average (average annual) around 61° F and reach up to 100°F. Precipitation has been averaging less than 16 inches and typically occurs between December and March. The prevailing wind is an on-shore flow between 7 and 11 mph from the Pacific Ocean. (Dudek, 2021, p. 9)

Fires can be a significant issue during summer and fall, before the rainy period, especially during dry Santa Ana wind events. The seasonal Santa Ana winds can be particularly strong in the Project area as warm and dry



Source(s): RCTLMA (2021), Nearmap (2022), Cal Fire (2021)

Figure 4.21-1



Wildfire Susceptibility



air is channeled through the San Gorgonio Pass from the dry, desert land to the east. Although Santa Ana events can occur anytime of the year, they generally occur during the autumn months, although the last few years have resulted in spring (April - May) and summer events. Santa Ana winds may gust up to 75 miles per hour (mph) or higher. This phenomenon markedly increases the wildfire danger and intensity in the Project area by drying out and preheating vegetation (fuel moisture of less than 5% for 1-hour fuels is possible) as well as accelerating oxygen supply, and thereby, making possible the burning of fuels that otherwise might not burn under cooler, moister conditions. (Dudek, 2021, p. 9)

D. Vegetation

1. Fuels (Vegetation)

The Project site and surrounding areas primarily support sage scrub plant community, non-native grasslands, and disturbed habitat. Vegetation types were derived from an on-site field assessment of the Project site conducted by Dudek. The vegetation cover types were assigned corresponding fuel models for use during site fire behavior modeling. (Dudek, 2021, p. 9)

2. Vegetation Dynamics

The vegetation characteristics described above are used to model fire behavior. Variations in vegetative cover type and species composition have a direct effect on fire behavior. Some plant communities and their associated plant species have increased flammability based on plant physiology (resin content), biological function (flowering, retention of dead plant material), physical structure (bark thickness, leaf size, branching patterns), and overall fuel loading. For example, non-native grass dominated plant communities become seasonally prone to ignition and produce lower intensity, higher spread rate fires. In comparison, sage scrub can produce higher heat intensity and higher flame lengths under strong, dry wind patterns, but does not typically ignite or spread as quickly as light, flashy grass fuels. (Dudek, 2021, pp. 9-10)

As described, vegetation plays a significant role in fire behavior, and is an important component to the fire behavior models utilized as part of the Project's FPP. A critical factor to consider is the dynamic nature of vegetation communities. Fire presence and absence at varying cycles or regimes disrupts plant succession, setting plant communities to an earlier state where less fuel is present for a period of time as the plant community begins its succession again. In summary, high frequency fires tend to convert shrublands to grasslands or maintain grasslands, while fire exclusion tends to convert grasslands to shrublands, over time. In general, biomass and associated fuel loading will increase over time, assuming that disturbance (fire or grading) or fuel reduction efforts are not diligently implemented. It is possible to alter successional pathways for varying plant communities through manual alteration. This concept is a key component in the overall establishment and maintenance of the proposed fuel modification zones. (Dudek, 2021, p. 10)

E. Fire History

Fire history data provides valuable information regarding fire spread, fire frequency, most vulnerable areas, and significant ignition sources, amongst others. In turn, this understanding of why fires occur in an area and



how they typically spread can then be used for pre-planning and designing defensible communities. (Dudek, 2021, p. 10)

Fire history represented in the Project's FPP uses the Fire and Resource Assessment Program (FRAP) database. FRAP summarizes fire perimeter data dating to the late 1800s, but which is incomplete due to the fact that it only includes fires over 10 acres in size and has incomplete perimeter data, especially for the first half of the 20th century. However, the data do provide a summary of recorded fires and can be used to show whether large fires have occurred in the Project area, which indicates whether they may be possible in the future. (Dudek, 2021, p. 10)

Appendix B to the Project's FPP (*Technical Appendix N*) presents a graphical view of the Project area's recorded fire history. As presented in the exhibit, there have been 73 fires recorded since 1913 by CALFIRE in the FRAP database. Two of these fires occurred in the vicinity of the Project, including two fires on-site both in the southern portion of the Project site. These fires, occurring in 1913 (x2), 1915 (x2), 1917 (x2), 1922, 1923 (x2), 1925, 1930, 1938 (x2), 1942 (x2), 1944, 1945 (x2), 1954, 1956, 1957, 1958, 1959, 1962, 1965, 1966, 1967, 1968 (x3), 1976, 1977, 1978 (x3), 1979, 1980 (x2), 1981 (x5), 1982, 1985 (x2), 1986, 1987 (x2), 1988 (x3), 1991, 1995 (x2), 1996, 1997, 1998 (x2), 1999, 2002, 2003, 2004, 2007 (x2), 2008, 2011, 2012 (x2), 2015, 2017, 2018, 2019, burned within a five mile radius of the Project Area. The two fires that have burned onto a portion of the Project site occurred in 1923 and 1967. Based on an analysis of the CAL FIRE FRAP fire history data set, specifically the years in which the fires burned, the average interval between wildfires in the area (including areas up to roughly 5 miles from the Project site) was calculated to be one year with intervals ranging between zero and nine years. Based on this analysis, it is expected that wildfire that could impact the Project site may occur, if weather conditions coincide, roughly every year with the realistic possibility of shorter or longer interval occurrences, as observed in the fire history records. (Dudek, 2021, pp. 10-11)

F. Project Area Fire Risk Assessment

Wildland fires are a common natural hazard in most of southern California with a long and extensive history. Southern California landscapes include a diverse range of plant communities, including vast tracts of grasslands and shrublands. Wildfire in this Mediterranean-type ecosystem ultimately affects the structure and functions of vegetation communities and will continue to have a substantial and recurring role. Supporting this are the facts that native landscapes, from forest to grasslands, become highly flammable each fall, and the climate of southern California has been characterized by fire climatologists as the worst fire climate in the United States with high winds (Santa Ana) occurring during autumn after a six-month drought period each year. Based on this research, the anticipated growing population of western Riverside County Wildland-Urban Interface (WUI) areas, and the region's fire history, it can be anticipated that periodic wildfires may start on, burn onto, or spot into the Project site. The most common type of fire anticipated in the vicinity of the Project Area is a wind-driven fire from the north/northeast moving through the annual grasses and sage scrub shrubs found in the Lake Mathews Estelle Mountain Reserve north of the Project site. (Dudek, 2021, p. 14)



4.21.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to wildfire hazards.

1. *Federal Regulations*

Healthy Forests Restoration Act of 2003

On August 22, 2002, President Bush established the Healthy Forests Initiative, directing the Departments of Agriculture and the Interior, and the Council on Environmental Quality, to improve regulatory processes to ensure more timely decisions, greater efficiency, and better results in reducing the risk of catastrophic wildland fires. On June 5, 2003, the Departments of Agriculture and the Interior adopted two new categorical exclusions from documentation in an environmental assessment or environmental impact statement (EIS): an exclusion for hazardous-fuel reduction and another for rehabilitation of resources and infrastructure damaged by wildfire (68 FR 33814).

2. *State Regulations*

Public Resources Code (PRC) Sections 4290-4299

These sections establish minimum statewide fire safety provisions pertaining to: roads for fire equipment access; signs identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; and fire fuel breaks and greenbelts. With certain exceptions, all new construction after July 1, 1991, in potential wildland fire areas, is required to meet these statewide standards. The state requirements, however, do not supersede more restrictive local regulations. (CA Legislative Info, n.d.)

As defined by CalFire, wildland areas defined as State Responsibility Areas (SRAs) may contain substantial wildfire risks and hazards. They consist of lands exclusive of cities, and federal lands regardless of ownership. The primary financial responsibility for preventing and suppressing fires within wildlands belongs to the State of California. However, it is not the State of California's responsibility to provide fire protection services to buildings or structures located within the wildlands unless CalFire has entered into a cooperative agreement with a local agency for those purposes pursuant to PRC Section 4142. As such, wildland areas require disclosure of these fire hazards in real estate transactions, and owners of properties in wildland areas are subject to PRC Section 4291 maintenance requirements. The law requires CalFire every five years (1991, 1996, 2001, etc.) to provide maps identifying the boundaries of lands classified as SRAs to the Riverside County Assessor. (CA Legislative Info, n.d.)

PRC Section 4213 – Fire Prevention Fees

Pursuant to PRC Section 4213, in July of 2011, the State of California began assessing an annual "Fire Prevention Fee" for all habitable structures within SRAs to pay for fire prevention services. SRAs are the portions of California where the State of California is financially responsible for the prevention and suppression of wildfires. The SRA does not include lands within incorporated city boundaries, Tribal or federally owned land. As of 2013, the fee is up to \$150 per habitable structure (i.e., a building that can be



occupied for residential use, which does not include incidental buildings such as detached garages, barns, outdoor bathrooms, sheds, etc.). (CA Legislative Info, n.d.)

California Government Code (CGC) Section 51178

This section specifies that the Director of CalFire, in cooperation with local fire authorities, shall identify areas that are Very High Fire Hazard Severity Zones (VHFHSZ) in Local Responsibility Areas (LRAs), based on consistent statewide criteria, and the expected severity of fire hazard. Per CGC § 51178, a local agency may, at its discretion, exclude from the requirements of § 51182 an area within its jurisdiction that has been identified as a VHFHSZ, if it provides substantial evidence in the record that the requirements of § 51182 are not necessary for effective fire protection within the area. Alternatively, local agencies may include areas not identified as VHFHSZ by CalFire, following a finding supported by substantial evidence in the record that the requirements of § 51182 are necessary for effective fire protection within the new area. According to § 51182, such changes made by a local agency shall be final, and shall not be rebuttable by CalFire. (CA Legislative Info, n.d.)

California Code of Regulations (CCR) Title 14 – Natural Resources

These regulations constitute the basic wildland fire protection standards of the California Board of Forestry. They were prepared and adopted to establish minimum wildfire protection standards in conjunction with building, construction, and development within SRAs. Among other things, Title 14 requires the design, and construction of structures, subdivisions, and developments in an SRA provide for basic emergency access and perimeter wildfire protection measures (fire fuel modification zones, etc.). (Westlaw, n.d.)

2019 California Fire and Building Codes

Part 2 of Title 24 of the CCR refers to the California Building Code, which contains complete regulations and general construction building standards of state adopting agencies, including administrative, fire and life safety, and field inspection provisions. Part 9 refers to the California Fire Code, which contains other fire safety-related building standards. In particular, Chapter 7A, “Materials and Construction Methods for Exterior Wildfire Exposure,” in the 2019 California Building Code addresses fire safety standards for new construction. In addition, Section 701A.3.2, “New Buildings Located in Any Fire Hazard Severity Zone,” states: (BSC, n.d.)

“New buildings located in any Fire Hazard Severity Zone within State Responsibility Areas, any Local Agency Very-High Fire Hazard Severity Zone, or any Wildland-Urban Interface Fire Area designated by the enforcing agency for which an application for a building permit is submitted on or after January 1, 2008, shall comply with all sections of this chapter.”

The Project would be subject to compliance with the current codes in place at the time of building permit applications.



4.21.3 BASIS FOR DETERMINING SIGNIFICANCE

Section XX of Appendix G to the State CEQA Guidelines addresses typical adverse effects associated with wildfire, and includes the following thresholds to evaluate a project's impacts due to wildfire (OPR, 2018a):

- If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan;
- If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risk, and thereby expose project occupants to pollutant concentrations for a wildfire or the uncontrolled spread of a wildfire;
- If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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; or
- If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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.

The following thresholds are derived from Riverside County's Environmental Assessment Checklist, and supplemented by the thresholds listed in Appendix G to the State CEQA Guidelines, in order to evaluate the significance of the proposed Project's impacts due to wildfires:

- a. *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 substantially impair an adopted emergency response plan or emergency evacuation plan;*
- b. *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, 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;*
- c. *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 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;*
- d. *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*



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; or

- e. 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 expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.*

The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist, as modified/updated per the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project’s impacts due to wildfires.

4.21.4 IMPACT ANALYSIS

Threshold a.: *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 substantially impair an adopted emergency response plan or emergency evacuation plan?*

The Project site is located within an SRA, and is classified as having a “High” to “Very High” susceptibility to wildfire hazards (RCIT, 2021). The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. Additionally, there are no emergency response plans or emergency evacuation plans in effect in the local area. During construction and long-term operation of the Project, adequate emergency access for emergency vehicles would be required to be maintained along public streets that abut the Project site. Furthermore, improvements planned as part of the Project are not anticipated to adversely affect traffic operations in the local area, including along nearby segments of Horsethief Canyon Road. As part of the County’s review process for future implementing developments (e.g., plot plans, conditional use permits), Riverside County would review the Project’s application materials to ensure that appropriate emergency ingress and egress would be available to-and-from the Project site and that circulation on the Project site is adequate for emergency vehicles. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur.

Threshold b.: *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, 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?*

Threshold e.: *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 expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

The Project site is located within an SRA, and is classified as having a “High” to “Very High” susceptibility to wildfire hazards (RCIT, 2021). In order to evaluate the Project’s potential to exacerbate wildfire risks, a Project-specific Fire Protection Plan (FPP) was prepared for the Project, the results and recommendations of which are discussed below. Refer to Section 3 of the Project’s FPP (*Technical Appendix N*) for a discussion of the methodology and computer software used to assess fire risks in the local area.

As previously noted, under existing conditions the Project site and surrounding areas are subject to wildland fire hazards. Based on the results of the Project’s FPP, Dudek recommends the provision of 100-foot-wide Fuel Modification Zones (FMZs). The required FMZs would include a 50-foot wide paved/irrigated Zone 1 extending out 50 feet from the proposed structures and a 50-foot wide paved/irrigated Zone 2 extending 50 feet beyond Zone 1 (50 to 100 feet). In most cases the FMZs would consist of asphalt roadways, parking stalls, and fully irrigated landscape with Riverside County Fire Department (RCFD) approved plant species (i.e., plant species that are not considered highly flammable). Dudek recommends that the FMZs be designed to provide buffers that gradually reduce fire intensity and flame lengths from advancing fire by strategically placing thinning zones, restricted vegetation zones, and irrigated zones adjacent to each other on the perimeter of the WUI exposed structures. Additionally, all structures on the Project site would be highly ignition resistant based on required construction design, materials, and methods, which would further reduce the risk of wildfires on site. (Dudek, 2021, pp. 25-27)

Within the 100-foot wide FMZs, the Project’s FPP recommends the inclusion of the following components, which would provide for an adequate level of protection from wildland fires (Dudek, 2021, p. 27):

- All trees shall be planted and maintained at a minimum of 10 feet from the tree’s drip line to any combustible structure.
- Tree spacing of a minimum 10 feet between canopies.
- Mature trees shall be limbed to eight feet or three times the height of understory plants to prevent ladder fuels, whichever is greater. No tree limb encroachment within 10 feet of a structure or chimney, including outside barbecues or fireplaces.
- Tree maintenance includes limbing-up (canopy raising) six feet or one-third the height of the tree
- Maintenance including ongoing removal and/or thinning of undesirable combustible vegetation, replacement of dead/dying plantings, maintenance of the programming and functionality of the irrigation system, regular trimming to prevent ladder fuels.
- A minimum of 36 inches wide pathway with unobstructed vertical clearance around the exterior of each structure (360°) provided for firefighter access (2019 CFC, Section 503.1.1). Within this clearance area, landscape such as low ground covers and shrubs are permitted so long as their placement and mature height do not impede firefighter access, consistent with purpose of this guideline.
- Trees and tree form shrub species that naturally grow to heights that exceed two feet shall be vertically pruned to prevent ladder fuels.



- Grasses shall be cut to four inches in height. Native grasses can be cut after going to seed.
- Ground covers within first three feet from structure restricted to non-flammable materials, including stone, rock, concrete, bare soil, or other. Combustible ground covers, such as mulch or wood chips, are prohibited adjacent to structures with an exterior stucco wall and weep screed.

However, in some cases, future buildings may not achieve the full 100-foot FMZ. In such cases, the FPP recommends fire rated split face Concrete Masonry Unit (CMU) and textured insulated metal panel exterior walls along the exposed side of each building, a National Fire Protection Association (NFPA) 13 Commercial Fire Sprinkler System, and fire rated exterior doors (including rated roll-up doors), along with asphalt roadways and parking, and a fully irrigated landscape. The combination of these fire prevention measures would provide a functional safety equivalency of a 100-foot fuel modification zone. In addition to the above-mentioned design features, Dudek recommends the following additional fire protection enhancement be required to provide further justification for the potentially reduced FMZ: (Dudek, 2021, pp. 25-26)

- Exposed walls that will not meet the minimum 100-foot fuel modification requirement shall be provided enhanced exterior wall construction. Walls shall be a minimum one-hour rated construction (or greater rating), with no openings, (windows or doors) unless openings are approved by RCFD. If exterior openings are provided along exposed walls, exterior fire sprinklers are recommended.

The above-described requirements have been incorporated into Section 2.9 of proposed SP 333A1, and would be enforced by the County as part of the Project's Conditions of Approval and through the County's future review of implementing developments, which would include a review for consistency with the requirements of SP 333A1. As concluded by the Project's FPP, implementation of the SP 333A1 requirements for fire abatement, including the provision of FMZs and additional measures where a 100-foot FMZ cannot be accommodated, as well as site design features (e.g., asphalt roads, parking areas, irrigated landscaping), would reduce the risk of wildfire hazards occurring on site to acceptable levels. Thus, with compliance with the fire abatement requirements of SP 333A1, the Project would not exacerbate wildfire risks, and would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Additionally, the Project would not expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

Threshold c.: 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 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?

The Project site is located within an SRA, and is classified as having a "High" to "Very High" susceptibility to wildfire hazards (RCIT, 2021). As described under the analysis of Thresholds b. and e., the Project would accommodate 100-foot wide FMZ from future buildings where feasible, and would include additional fire protection measures for buildings where the 100-foot wide FMZ cannot be achieved. The proposed fire abatement measures would reduce the risk of fire in the local area as compared to existing conditions. While



FMZs would be required throughout the proposed development, areas subject to fuel modification would occur in areas already planned for impact as part of site development. Thus, impacts to areas requiring FMZs have been evaluated throughout this EIR under the appropriate subject heading (e.g., biological resources, cultural resources), and where impacts are identified mitigation measures are identified to reduce impacts to the extent feasible. There are no components of the proposed FMZs that would result in impacts not already addressed by this EIR. Accordingly, the Project would not exacerbate fire risk, and would not result in temporary or ongoing impacts to the environment beyond what is already evaluated and disclosed by this EIR. Impacts would be less than significant.

Threshold d.: 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 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?

The Project site is located within an SRA, and is classified as having a “High” to “Very High” susceptibility to wildfire hazards (RCIT, 2021). As discussed under the analysis of Thresholds b. and e., pursuant to SP 333A1 the Project would accommodate 100-foot wide FMZ from future buildings where feasible, and would include additional fire protection measures for buildings where the 100-foot wide FMZ cannot be achieved. Implementation of the measures detailed in proposed SP 333A1 would reduce the risk of wildfire at this site and would improve the ability of firefighters to fight fires on the properties and protect property and neighboring resources, irrespective of the cause or location of ignition. (Dudek, 2021, p. 35) Although during extreme fire conditions there still would remain a potential for wildland fires to affect future buildings on site, implementation of the required enhanced construction features provided by the applicable codes and the fuel modification requirements required by SP 333A1 would reduce the site's vulnerability to wildfire to less-than-significant levels.

Based on the site’s hydrologic conditions, the Project site would not be subject to flood hazards associated with fire events, and with development of the site runoff on the site would be controlled by the Project’s proposed drainage system, thereby precluding fire-related flooding impacts downstream. There are no prominent hillsides in areas surrounding the Project site that could be subject to mass wasting (landslides) in the event of a wildfire. Therefore, the Project would not 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, and impacts would be less than significant.

4.21.5 CUMULATIVE IMPACT ANALYSIS

The cumulative study area for the issue of wildfire includes areas within a five-mile radius of the Project site. This study area is appropriate for analysis because fire events located more than five miles from the Project site are unlikely to affect the Project, and any fires starting in the Project area likely would not affect lands located more than five miles away. This study area also is consistent with the Project’s FPP, which evaluates historic fire events within approximately five miles of the Project site.



The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route, and the Project would not serve as an evacuation route under long-term conditions. During construction and at Project build-out, the proposed Project would be required to maintain adequate access for emergency vehicles. Other cumulative developments similarly would be required to accommodate emergency access and facilities. As such, cumulatively-considerable impacts would be less than significant.

As indicated under the discussion of Thresholds b. and e., future development on site would be required to comply with the fire abatement requirements specified by proposed SP 333A1, which includes the provision of FMZs, and special building requirements for future buildings that cannot accommodate a full 100-foot wide FMZ. Compliance with the requirements of SP 333A1 would ensure that the Project does not exacerbate wildfire hazards or expose people or structures to a significant risk of loss, injury, or death involving wildland fire hazards. Other developments within the cumulative study area would similarly be required to address fire hazards as appropriate and to provide measures to avoid or reduce the potential risk of wildfire in the region. As such, cumulatively-considerable impacts due to wildfire hazards would be less than significant.

As discussed under the analysis of Threshold c., although the Project would require FMZs, areas requiring fuel modification occur in areas already planned for impact as part of site development. Thus, cumulatively-considerable impacts to areas requiring FMZs have been evaluated throughout this EIR under the appropriate subject heading (e.g., biological resources, cultural resources), and where impacts are identified mitigation measures are identified to reduce cumulative impacts to the extent feasible. Other future developments in the cumulative study area that contain fire protection infrastructure similarly would be required to identify and mitigate any physical impacts to the environment resulting from fire protection measures. Thus, with the mitigation measures presented throughout this EIR to address cumulatively-considerable impacts, the Project's cumulatively-considerable impacts due to the installation or maintenance of fire protection infrastructure would be less than significant.

As indicated under the discussion of Threshold d., with implementation of the Project the risk of wildfire hazards occurring on the Project site would be substantially reduced. Additionally, Project-related runoff, including runoff following fire events, would be controlled by the Project's proposed drainage system, which includes water quality/detention basins to preclude a substantial increase in the rate of runoff. There are no components of the Project that would result in increased potential for landslides, including during fire events. Thus, cumulatively-considerable impacts due to the exposure of 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, would be less than significant.

4.21.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Less-than-Significant Impact. The Project site and surrounding areas are not identified as evacuation routes, and there are no adopted emergency response plans or emergency evacuation plans applicable to the Project area. During construction and at Project build-out, the proposed Project would be required to maintain adequate access for emergency vehicles. Accordingly, the Project would not impair



implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and impacts would be less than significant.

Thresholds b. and e.: Less-than-Significant Impact. The Project would be subject to the fire abatement requirements specified by SP 333A1, which includes requirements for the provision of a 100-foot wide FMZ around all buildings, and specifies additional fire protection measures for buildings where the 100-foot wide FMZ cannot be achieved. With mandatory compliance with the fire abatement requirements of SP 333A1, the Project would not exacerbate wildfire risks, and would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Additionally, the Project would not expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires with implementation of the Project's proposed fire protection measures, and the Project would accommodate adequate circulation facilities to allow for evacuation of the site in the event of wildfires in the area. Impacts would be less than significant.

Threshold c.: Less-than-Significant Impact. Impacts to areas requiring FMZs have been evaluated throughout this EIR under the appropriate subject heading (e.g., biological resources, cultural resources), and where impacts are identified mitigation measures are identified to reduce impacts to the extent feasible. There are no components of the proposed FMZs that would result in impacts not already addressed by this EIR. Accordingly, the Project would not exacerbate fire risk, and would not result in temporary or ongoing impacts to the environment beyond what is already evaluated and disclosed by this EIR. Impacts would be less than significant.

Threshold d.: Less-than-Significant Impact. Although during extreme fire conditions there still would remain a potential for wildland fires to affect future buildings on site, implementation of the required enhanced construction features provided by the applicable codes and the fuel modification requirements required by SP 333A1 would reduce the site's vulnerability to wildfire to less-than-significant levels. Additionally, with development of the site runoff on the site would be controlled by the Project's proposed drainage system, thereby precluding fire-related flooding impacts downstream. In addition, the Project site would not cause or be affected by fire-induced landslides. Therefore, the Project would not 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, and impacts would be less than significant.

4.21.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- Future implementing developments within the Project site (e.g., plot plans, building permits, etc.) shall be reviewed by Riverside County for compliance with the fire protection measures included in Section 2.9, *Fire Protection Plan*, of SP 333A1.



Mitigation

Impacts would be less than significant; therefore, mitigation measures are not required.



5.0 OTHER CEQA CONSIDERATIONS

5.1 SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

The State CEQA Guidelines require that an EIR disclose the significant environmental effects of a project which cannot be avoided if the proposed project is implemented (State CEQA Guidelines § 15126[b]). As described in detail in Section 4.0 of this EIR, the proposed Project is anticipated to result in several impacts to the environment that cannot be reduced to below a level of significance after the implementation of relevant standard conditions of approval, compliance with applicable laws and regulations, and application of feasible mitigation measures. The significant environmental effects of the proposed Project that cannot be feasibly mitigated are as follows:

- Agricultural and Forestry Resources: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. The Project would result in direct, permanent impacts due to the conversion of approximately 80.0 acres of “Farmland of Local Importance” to non-agricultural use. Mitigation measures are not available to reduce impacts to 80.0 acres of “Farmland of Local Importance” to below a level of significance; thus, impacts would be significant and unavoidable.
- Air Quality: Significant and Unavoidable Direct and Cumulatively-Considerable Impacts. Long-term operations of the proposed Project would result in daily emissions of NO_x and ROG_s that exceed the SCAQMD Regional Thresholds. Although mitigation measures are identified to reduce impacts to the maximum feasible extent, a majority of NO_x emissions associated with Project operations would result from vehicular traffic, and in particular truck traffic. Mobile source emissions are regulated by standards imposed by federal and State agencies, not local governments; thus, feasible mitigation is not available to reduce the Project’s emissions of NO_x to below a level of significance. With respect to ROG emissions, a majority of the Project’s ROG emissions (84.6%) are associated with area sources such as architectural coatings and consumer products. ROG emissions from consumer product (i.e., solvents used in cleaning supplies, kitchen aerosols, cosmetics, and toiletries) make up most of the area source emissions (approximately 88%). As with mobile sources, consumer products cannot be regulated by the County of Riverside. CARB is primarily responsible for controlling pollution from consumer products. Impacts would be significant and unavoidable on both a direct and cumulatively-considerable basis. Additionally, because Project operational-related emissions would exceed the SCAQMD Regional Thresholds and because the Project’s proposed land uses are not consistent with the growth forecasts included in the 2016 SCAQMD AQMP, the Project also would result in a significant and unavoidable direct and cumulatively-considerable impact due to a conflict with the 2016 SCAQMD AQMP.
- Greenhouse Gas (GHG) Emissions: Significant and Unavoidable Cumulatively-Considerable Impact. Implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2 would ensure that the proposed Project is fully consistent with the Riverside County CAP Update (November 2019) by requiring the Project Applicant to demonstrate that implementing building permit applications have incorporated



measures to achieve a minimum of 100 points pursuant to the CAP Update Screening Tables, and by requiring the Project Applicant to demonstrate that a minimum of 20% of the Project's energy demand would be met through renewable energy production. Notwithstanding, even with implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2, it cannot be ensured that the Project's GHG emissions would be reduced to below the CAP Update screening level threshold of 3,000 metric tons of carbon dioxide equivalent per year (MTCO_{2e}). Because the Project's emissions cannot be reduced to below the CAP Update screening threshold of 3,000 MTCO_{2e}/yr, Project impacts due to direct or indirect GHG emissions are conservatively evaluated as a significant and unavoidable impact of the proposed Project for which additional feasible mitigation measures are not available.

- Transportation: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. The Existing Plus Project generated VMT per employee is 22.76, which would exceed the County's adopted threshold of 14.24 VMT per employee by approximately 60 percent. Mitigation Measure MM 4.18-1 requires that a VMT assessment be prepared for future implementing developments (e.g., plot plans, conditional use permits) in order to identify feasible site-specific TDM strategies that would serve to reduce VMT, while Mitigation Measure MM 4.18-2 requires future owner users and tenants to participate in Riverside County's Rideshare Program. However, inclusion of such VMT reduction measures in areas that are characteristically suburban in context are limited to a maximum VMT reduction of 15%. This maximum reduction for cross-category transportation-related mitigation measures of 15% for suburban settings is also noted in the County Guidelines. Therefore, even with the implementation of all feasible VMT reduction measures, Project-generated VMT cannot be reduced to a level of less than significant.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL IMPACTS WHICH WOULD BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

The State CEQA Guidelines require EIRs to address any significant irreversible environmental changes that would be involved in the proposed action should it be implemented (State CEQA Guidelines § 15126.2(c)). An environmental change would fall into this category if: a) the project would involve a large commitment of non-renewable resources; b) the primary and secondary impacts of the project would generally commit future generations to similar uses; c) the project involves uses in which irreversible damage could result from any potential environmental accidents; or d) the proposed consumption of resources is not justified (e.g., the project results in the wasteful use of energy).

Determining whether the proposed Project may result in significant irreversible environmental changes requires a determination of whether key non-renewable resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. Natural resources in the form of construction materials and energy resources would be used in the construction of the proposed Project, but development of the Project site as proposed would have no measurable adverse effect on the availability of such resources, including resources that may be non-renewable (e.g., fossil fuels). Construction and operation of the proposed Project would not involve the use of large sums or sources of non-renewable energy. Additionally, the Project is required by law to comply with the California Building Standards Code (CALGreen), compliance with



which reduces a building operation's energy volume that is produced by fossil fuels. The Project would be subject to regulations to reduce the Project's reliance on non-renewable energy sources. The Project also would be subject to the Energy Independence and Security Act of 2007, which contains provisions designed to increase energy efficiency and availability of renewable energy. In addition, the Project would be subject to California Energy Code, or Title 24, which contains measures to reduce natural gas and electrical demand, thus requiring less non-renewable energy resources. The Project would avoid the inefficient, wasteful, and unnecessary consumption of energy during Project construction, operation, maintenance, and/or removal. With mandatory compliance to the energy efficiency regulations and mitigation measures, the Project would not involve the use of large sums or sources of non-renewable energy.

EIR Subsection 4.9, *Hazards and Hazardous Materials*, provides an analysis of the proposed Project's potential to transport or handle hazardous materials which, if released into the environment, could result in irreversible damage. As concluded in the analysis, compliance with federal, State, and local regulation related to hazardous materials would be required of all contractors working on the property during the Project's construction and of all the future occupants of the Project's buildings. As such, construction and long-term operation of the proposed Project would not have the potential to cause significant irreversible damage to the environment, including damage that may result from upset or accident conditions.

5.3 GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECT

CEQA requires a discussion of the ways in which the proposed Project would be growth inducing. The State CEQA Guidelines identify a project as growth inducing if it would foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (State CEQA Guidelines § 15126.2(d)). New employees and new residential developments represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and including additional economic activity in the area.

A project could indirectly induce growth at the local level by increasing the demand for additional goods and services associated with an increase in population or employment and thus reducing or removing the barriers to growth. This typically occurs in suburban or rural environments where population or employment growth results in increased demand for service and commodity markets responding to the new population of residents or employees. Economic growth would likely take place as a result of the proposed Project's operation as a light industrial and business park development. The Project's construction- and operational-related employees would purchase goods and services in the region, but any secondary increase in employment associated with meeting these goods and services needs would be marginal, accommodated by existing goods and service providers, and highly unlikely to result in any new physical impacts to the environment. Therefore, while the Project would create economic opportunities caused by introducing new job opportunities to the Project site, this change would not induce substantial new growth in the region.

Under CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of significance to the environment. Typically, growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in pertinent master plans, land use plans, or in projections made by regional planning agencies such as SCAG. Significant growth impacts also could



occur if a project provides infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies. In general, growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth significantly affects the environment in some other way.

The area surrounding the Project site includes a master-planned residential community to the west and south; undeveloped lands, rural residential, agricultural, and construction-related uses to the east; and planned commercial development, I-15, and undeveloped lands and light industrial/business park uses to the north. Development of the Project site with light industrial and business park land uses would not directly induce surrounding properties to develop. Areas to the west and south of the Project site are fully built out with medium-density residential land uses, and there are no components of the proposed Project that would trigger unplanned growth and development on lands located east of the Project site. Furthermore, roadway and utility improvements proposed as part of the Project have been designed to serve the proposed Project, and would not remove infrastructure-related obstacles to development of other off-site properties. Additionally, and based on the analysis provided in EIR Subsections 4.18, *Transportation*, and 4.20, *Utilities and Service Systems*, with improvements, fee payments, and fair-share monetary contributions, all roadways that would serve the Project would have the capacity to accommodate Project and cumulative traffic, and the Project would be adequately served by water service, sewer service, drainage facilities, and other utilizes and service systems. Accordingly, the growth-inducing impacts of the Project would be less than significant. The Project is not expected to induce growth of land uses changes on the other parcels in the vicinity, as other lands surrounding the site are either already developed or planned to be developed consistent with their General Plan land use designations.

Furthermore, the proposed Project's improvements to the public infrastructure, including roads, drainage infrastructure, and other utility improvements are consistent with Riverside County's General Plan and would not indirectly induce substantial and unplanned population growth in the local area.

5.4 EFFECTS FOUND NOT TO BE SIGNIFICANT DURING THE INITIAL STUDY PROCESS

An Initial Study was not prepared and was not required for the Project. In accordance with CEQA requirements, this Program EIR evaluates all of the environmental topics contained in Appendix G to the State CEQA Guidelines, as well as the supplemental topics and thresholds of significance included in Riverside County's Environmental Assessment Checklist.



6.0 ALTERNATIVES

State CEQA Guidelines § 15126.6(a) describes the scope of analysis that is required when evaluating alternatives to proposed projects, as follows:

“An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selection of a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”

As discussed in EIR Section 4.0, *Environmental Analysis*, the proposed Project would result in significant adverse environmental effects that cannot be mitigated to below levels of significance after the implementation of Project design features, mandatory regulatory requirements, and feasible mitigation measures. The unavoidable significant impacts are:

- Agricultural and Forestry Resources: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. The Project would result in direct, permanent impacts due to the conversion of approximately 80.0 acres of “Farmland of Local Importance” to non-agricultural use. Mitigation measures are not available to reduce impacts to 80.0 acres of “Farmland of Local Importance” to below a level of significance; thus, impacts would be significant and unavoidable.
- Air Quality: Significant and Unavoidable Direct and Cumulatively-Considerable Impacts. Long-term operations of the proposed Project would result in daily emissions of NO_x and ROG_s that exceed the SCAQMD Regional Thresholds. Although mitigation measures are identified to reduce impacts to the maximum feasible extent, a majority of NO_x emissions associated with Project operations would result from vehicular traffic, and in particular truck traffic. Mobile source emissions are regulated by standards imposed by federal and State agencies, not local governments; thus, feasible mitigation is not available to reduce the Project’s emissions of NO_x to below a level of significance. With respect to ROG emissions, a majority of the Project’s ROG emissions (84.6%) are associated with area sources such as architectural coatings and consumer products. ROG emissions from consumer product (i.e., solvents used in cleaning supplies, kitchen aerosols, cosmetics, and toiletries) make up most of the area source emissions (approximately 88%). As with mobile sources, consumer products cannot be regulated by the County of Riverside. CARB is primarily responsible for controlling pollution from consumer products. Impacts would be significant and unavoidable on both a direct and cumulatively-considerable basis. Additionally, because Project operational-related emissions would exceed the SCAQMD Regional Thresholds and because the Project’s proposed land uses are not consistent with



the growth forecasts included in the 2016 SCAQMD AQMP, the Project also would result in a significant and unavoidable direct and cumulatively-considerable impact due to a conflict with the 2016 SCAQMD AQMP.

- Greenhouse Gas (GHG) Emissions: Significant and Unavoidable Cumulatively-Considerable Impact. Implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2 would ensure that the proposed Project is fully consistent with the Riverside County CAP Update (November 2019) by requiring the Project Applicant to demonstrate that implementing building permit applications have incorporated measures to achieve a minimum of 100 points pursuant to the CAP Update Screening Tables, and by requiring the Project Applicant to demonstrate that a minimum of 20% of the Project's energy demand would be met through renewable energy production. Notwithstanding, even with implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2, it cannot be ensured that the Project's GHG emissions would be reduced to below the CAP Update screening level threshold of 3,000 metric tons of carbon dioxide equivalent per year (MTCO_{2e}). Because the Project's emissions cannot be reduced to below the CAP Update screening threshold of 3,000 MTCO_{2e}/yr, Project impacts due to direct or indirect GHG emissions are conservatively evaluated as a significant and unavoidable impact of the proposed Project for which additional feasible mitigation measures are not available.
- Transportation: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. The Existing Plus Project generated VMT per employee is 22.76, which would exceed the County's adopted threshold of 14.24 VMT per employee by approximately 60 percent. Mitigation Measure MM 4.18-1 requires that a VMT assessment be prepared for future implementing developments (i.e., plot plans, conditional use permits, etc.) in order to identify feasible site-specific TDM strategies that would serve to reduce VMT, while Mitigation Measure MM 4.18-2 requires future owner users and tenants to participate in Riverside County's Rideshare Program. However, inclusion of such VMT reduction measures in areas that are characteristically suburban in context are limited to a maximum VMT reduction of 15%. This maximum reduction for cross-category transportation-related mitigation measures of 15% for suburban settings is also noted in the County Guidelines. Therefore, even with the implementation of all feasible VMT reduction measures, Project-generated VMT cannot be reduced to a level of less than significant.

6.1 ALTERNATIVES UNDER CONSIDERATION

State CEQA Guidelines § 15126.6(e) requires that an alternative be included that describes what would reasonably be expected to occur on the property in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services (i.e., "no project" alternative). For development projects that include a revision to an existing land use plan, the "no project" alternative is considered to be the continuation of the existing land use plan into the future. For projects other than a land use plan, such as a development project on an identifiable property, the "no project" alternative is considered to be a circumstance under which the project does not proceed (State CEQA Guidelines § 15126.6(e)(3)(A-B)). For the alternatives analysis in this EIR, the potential scenario where the Project site remains in its current undeveloped condition is considered to be the "No Development Alternative (NDA),"



while the potential scenario where the existing General Plan land use plan is implemented is considered to be the “No Project (Adopted Specific Plan) Alternative.”

The following scenarios are identified by the County of Riverside as potential alternatives to implementation of the proposed Project. The Reduced Project Alternative is considered the Environmentally Superior Alternative pursuant to State CEQA Guidelines § 15126.6.

6.1.1 NO DEVELOPMENT ALTERNATIVE (NDA)

The No Development Alternative (NDA) considers no development/disturbance on the Project site beyond that which occurs under existing conditions. As such, the Project site would continue to consist of 157.1 acres of vacant and undeveloped land. Under the NDA, no improvements would be made to the Project site and none of the Project’s roadway, utility, or other infrastructure improvements would occur. This Alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would leave the Project site in its existing condition.

6.1.2 NO PROJECT (ADOPTED SPECIFIC PLAN) ALTERNATIVE (NPA)

The No Project (Existing Specific Plan) Alternative, herein referred to as the “No Project Alternative (NPA),” assumes development of the 157.1-acre property in accordance with the site’s existing General Plan and Specific Plan land uses. Figure 2-5 in EIR Subsection 2.0 depicts the site’s existing Specific Plan land use designations. Thus, under this alternative, and consistent with the adopted Renaissance Ranch Specific Plan No. 333 (SP 333), the Project site would be developed with 355 Medium Density Residential dwelling units on 98.7 acres, with minimum lot sizes ranging from 5,000 s.f. to 8,000 s.f. in size; a Community Park on 4.3 acres; four pocket parks on 2.0 acres; Open Space/Conservation land uses on 27.1 acres; and Open Space/Drainage uses on 25.7 acres. This Alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would allow for buildout of the Project site in accordance with the site’s existing General Plan and SP 333 land use designations.

6.1.3 REDUCED PROJECT ALTERNATIVE (RPA)

The Reduced Project Alternative (RPA) considers development of the Project site in a manner similar to the proposed Project, but with a reduced development intensity. Specifically, proposed Business Park and Light Industrial land uses would be developed at a maximum Floor Area Ratio (FAR) of 0.35, in lieu of the 0.50 FAR proposed as part of the Project. As with the proposed Project, Light Industrial building area is assumed to consist of approximately 20% “High-Cube Cold Storage” uses, 35% “High-Cube Fulfillment Center” uses, 35% “High Cube Warehouse” uses, and 10% “Manufacturing” uses, while Business Park building area is assumed to consist of approximately 60% “Industrial Park” uses and 40% “Warehouse” uses. As summarized in Table 6-1, *Reduced Project Alternative Land Uses*, the RPA would result in up to 274,428 s.f. of Business Park land uses and 1,481,911 s.f. of Light Industrial uses, for a total of 1,756,339 s.f. of building area. All other components of the RPA would be identical to the proposed Project, including areas planned for physical impacts both on and off site. This alternative was selected by the Lead Agency in order to evaluate an alternative that would reduce the Project’s significant and unavoidable impacts to air quality and transportation.



Table 6-1 Reduced Project Alternative Land Uses

Planning Area	Land Use Designation	Acres	Maximum Building Square Footage	Anticipated Use Types and Building Area ¹
1	Business Park (BP)	18.0	274,428 s.f.	Warehousing: 109,771 s.f. Industrial Park: 164,657 s.f.
2	Light Industrial (LI)	97.2	1,481,911 s.f.	High-Cube Cold Storage: 296,382 s.f. High-Cube Fulfillment: 518,669 s.f. High-Cube Warehouse: 518,669 s.f. Manufacturing: 148,191 s.f.
Development Subtotal:		115.2	1,756,339 s.f.	1,756,339 s.f.
3	Open Space – Conservation (OS-C)	6.1	--	Open Space
4	Open Space – Conservation (OS-C)	5.4	--	Open Space
Open Space – Conservation Subtotal:		11.5	--	--
5	Open Space – Conservation Habitat (OS-CH)	1.8	--	Open Space Habitat
6	Open Space – Conservation Habitat (OS-CH)	25.3	--	Open Space Habitat
Open Space – Conservation Habitat Subtotal:		27.1	--	--
--	Circulation	3.3	--	Major Circulation
Project Total:		157.1	1,756,339 s.f.	1,756,339 s.f.

6.2 ALTERNATIVES CONSIDERED AND REJECTED

An EIR is required to identify any alternatives that were considered by the Lead Agency but were rejected as infeasible. Among the factors described by State CEQA Guidelines § 15126.6 in determining whether to exclude alternatives from detailed consideration in the EIR are: a) failure to meet most of the basic project objectives, b) infeasibility, or c) inability to avoid significant environmental impacts. With respect to the feasibility of potential alternatives to the proposed Project, State CEQA Guidelines § 15126.6(f)(1) notes:

“Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries...and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site...”

In determining an appropriate range of alternatives to be evaluated in this EIR, a number of possible alternatives were initially considered and, for a variety of reasons, rejected. Alternatives were rejected because either: 1) they could not accomplish the basic objectives of the Project, 2) they would not have resulted in a reduction of significant adverse environmental impacts, and/or 3) they were considered infeasible to construct or operate. A summary of the alternatives that were considered but rejected are described below.

6.2.1 ALTERNATIVE SITES

CEQA does not require that an analysis of alternative sites always be included in an EIR. However, if the surrounding circumstances make it reasonable to consider an alternative site, then this alternative should be considered and analyzed in the EIR. In making the decision to include or exclude analysis of an alternative site, the “key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would



avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR” (State CEQA Guidelines § 15126.6(f) (2)).

Based on a review of aerial photography, the Riverside County General Plan land use map and a list of approved/pending development proposals within Riverside County and nearby jurisdictions, there are no other available, undeveloped properties of similar size (i.e., approximately 157.1 acres) that are zoned for and adjacent to other properties designated for urban development and that would reduce or avoid the Project’s significant and unavoidable impacts. For example, development of the Project at an alternative site location would not reduce or avoid the Project’s significant and unavoidable air quality impacts due to operational-related NO_x and ROG emissions, as it would not be possible to develop 97.2 acres of Light Industrial and 18.0 acres of Business Park land uses without exceeding the SCAQMD Regional Thresholds for these pollutants under long-term operational conditions. Although a different site location would potentially avoid the Project’s significant and unavoidable impacts due to the conversion of Farmland to non-agricultural use, the fact is that the Project site is designated for urban development and ultimately would be developed with non-agricultural uses and/or ultimately would be surrounded by urban development that would render agricultural uses infeasible due to land use compatibility issues. In addition, a different site location would merely shift the Project’s unavoidable impacts due to VMTs to a different location, and it is likely that similar or more severe near-term impacts could occur at off-site locations if the Project were instead to be developed in an area with a more balanced ratio of jobs and housing. For these reasons, Riverside County finds that evaluation of an alternative site location is not required for the Project because alternative site locations would not reduce or avoid the Project’s significant environmental effects.

6.2.2 AIR QUALITY IMPACT AVOIDANCE ALTERNATIVE

As indicated in EIR Subsection 4.3, the Project would result in significant and unavoidable impacts to air quality because the Project’s anticipated daily emissions of NO_x (329.02 pounds per day) would exceed the SCAQMD Regional Threshold for this pollutant (55 pounds per day). An alternative was considered to reduce the Project’s operational NO_x emissions to below the SCAQMD threshold. However, in order to reduce emissions to below the SCAQMD threshold, the Project would be limited to about 16.7% of the building area proposed as part of the Project. Specifically, while the Project would allow for up to 392,040 s.f. of “Business Park” building area and up to 2,117,016 s.f. of “Light Industrial” building area, under the Air Quality Impact Avoidance Alternative, building area would be limited to 65,534 s.f. of “Business Park” building area and 353,887 s.f. of “Light Industrial” building area, resulting in an overall FAR of 0.08. It should be noted that this alternative would not avoid the Project’s significant impact due to GHG emissions, as even with an approximate 83.3% reduction in GHG emissions the Project still would exceed the County’s screening threshold of 3,000 metric tons of CO_{2e} per year. Additionally, this alternative would not avoid the Project’s significant and unavoidable impacts due to VMTs, as the reduction in building area would result in a concomitant reduction in the number of employees, resulting in a similar ratio of VMT to employees as compared to the proposed Project. While technically feasible, developing 115.2 acres of the Project site with only 65,534 s.f. of “Business Park” building area and 353,887 s.f. of “Light Industrial” building area would represent an inefficient form of land use and also would not allow the Project Applicant to make a reasonable return on their investment in the property. Due to the substantial reduction in building area, such an alternative also would not adequately meet the Project’s objectives to “efficiently develop” the Project site, to improve



the jobs/housing balance within the area, or to facilitate job creation. Accordingly, Riverside County finds that implementation of an Air Quality Impact Avoidance Alternative would not be feasible.

6.3 ALTERNATIVE ANALYSIS

The following discussion compares the impacts of each alternative considered by the Lead Agency with the impacts of the proposed Project, as detailed in EIR Subsection 4.0, *Environmental Analysis*. A conclusion is provided for each impact as to whether the alternative results in one of the following (1) reduction or elimination of the proposed Project's impact, (2) a greater impact than would occur under the proposed Project, (3) the same impact as the proposed Project, or (4) a new impact in addition to the proposed Project's impacts. Table 6-2, *Alternatives to the Proposed Project – Comparison of Environmental Impacts*, located at the end of this Section, compares the environmental hazard and resource impacts of the alternatives with those of the proposed Project and identifies the ability of the alternative to meet the basic objectives of the Project. As described in EIR Subsection 3.1, the fundamental purpose and goal of the proposed Project is to accomplish the orderly development of underutilized property with an economically viable, employment-generating use to increase employment opportunities in a housing rich portion of unincorporated Riverside County. The specific objectives of the proposed Project are:

- A. To efficiently develop an underutilized property with a complementary mix of employment-generating land uses, including light industrial and business park land uses.
- B. To assist the SCAG region in achieving jobs/housing balance region-wide and in the local area by providing additional job opportunities in a housing rich area of the Inland Empire that will reduce the need for members of the local workforce to commute outside the area for employment.
- C. To expand economic development, facilitate job creation, and increase the tax base for Riverside County by accommodating and diversifying facilities needed to support the goods movement supply chain.
- D. To establish development standards and design guidelines to ensure future development on site complements other existing and planned uses in the immediate vicinity and minimizes conflicts with other nearby land uses.
- E. To establish a unified thematic concept for future development through design elements such as architecture, monumentation, theme walls, and landscaping using a long-range comprehensive planning approach that cannot be accomplished on a parcel-by-parcel basis.
- F. To anticipate market demand by providing a mixture of light industrial and business park land uses in a master-planned commerce center that would be marketable within the evolving economic profile of western Riverside County.



- G. To develop a mix of light industrial and business park uses in unincorporated Riverside County that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar uses in the local area and region.
- H. To develop a property that has access to available infrastructure, including roads and utilities.

6.3.1 NO DEVELOPMENT ALTERNATIVE

The No Development Alternative (NDA) considers no development/disturbance on the Project site beyond that which occurs under existing conditions. As such, the Project site would continue to consist of 157.1 acres of vacant and undeveloped land. Under the NDA, no improvements would be made to the Project site and none of the Project's roadway, utility, or other infrastructure improvements would occur. This Alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would leave the Project site in its existing condition.

A. *Aesthetics*

The NDA considers no development or disturbance on the Project site beyond that which occurs under existing conditions. As such, the 157.1-acre site would remain vacant and undeveloped. Thus, the Project's less-than-significant impacts to scenic vistas would be avoided under this Alternative. The Project site is not visible from any officially-designated scenic highways; thus, impacts to scenic highways would be less than significant and similar to the proposed Project. Although the Project is not expected to degrade the existing visual character or quality of the site or its surroundings, implementation of the NDA would retain the site's existing visual character and impacts would be reduced in comparison to the Project. Although the Project would be subject to compliance with Riverside County Ordinance Nos. 655 and 915 and would result in less-than-significant light and glare impacts, no new lighting sources or sources of potential glare would occur on site under the NDA; thus, impacts associated with light and glare would be reduced in comparison to the proposed Project.

B. *Agriculture and Forestry Resources*

Under the NDA, no new development would occur on site. Thus, implementation of the NDA would avoid the Project's significant and unavoidable impacts due to the conversion of approximately 80.0 acres of "Farmland of Local Importance" to non-agricultural use. Neither the Project nor the NDA would result in a conflict with existing agricultural zoning or land subject to a Williamson Act or Riverside County Agricultural Preserve, and impacts would be less than significant and similar. There are no lands surrounding the Project site that are zoned for agricultural use; thus, neither the Project nor NDA would result in a conflict with agricultural zoning, and the level of impact would be similar. Additionally, the Project site is not utilized for agricultural production, is not located within any agricultural preserves, and is not subject to a Williamson Act Contract. As such, neither the Project nor the NDA would result in a conflict with existing agricultural uses, agricultural preserves, or lands subject to a Williamson Act Contract; therefore, impacts would not occur and the level of impact would be similar. The Project site and surrounding areas are not zoned for 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)). As such, neither the Project nor the NDA would result in impacts to forestry resources, and impacts would be the same.

C. Air Quality

Under the NDA, there would be no new construction or development on the Project site. Although construction-related emissions under the proposed Project would be mitigated to below a level of significance, implementation of the NDA would not result in any construction-related emissions and impacts would therefore be reduced. Additionally, because the NDA would not involve any new development on site, implementation of the NDA would not result in any new air quality emissions and implementation of the NDA would avoid the Project's significant and unavoidable impacts due to operational-related emissions of NO_x and ROG. Furthermore, implementation of the NDA would avoid the Project's significant and unavoidable impacts due to a conflict with the 2016 SCAQMD AQMP. Although implementation of the proposed Project would result in less-than-significant impacts due to the exposure of sensitive receptors to substantial pollution concentrations, these less-than-significant impacts would be avoided under the NDA. Similarly, the Project's less-than-significant impacts due to construction or operational related odor emissions would be avoided under the NDA.

D. Biological Resources

With implementation of the NDA, there would be no new construction or development on the Project site. As such, the NDA would avoid all of the Project's significant but mitigable impacts to biological resources. Specifically, the NDA would avoid the Project's potential conflict with the MSHCP (prior to mitigation). The NDA also would not result in any construction-related impacts to nesting birds. The NDA also would avoid the Project's impacts to 3.36 acres of southern cottonwood willow riparian forest, including impacts to 3.31 acres of southern cottonwood willow riparian forest that were previously mitigated to below a level of significance and 0.05 acres of new impacts associated with the proposed Project. The NDA also would avoid the Project's impacts to riparian, jurisdictional, and wetland resources, although a majority of these impacts also have previously been mitigated in accordance with Wildlife Agency permits previously issued for the Project site.

E. Cultural Resources

Under the NDA, no new development would occur on site. Although the Project would not result in impacts to any known historical resources, the NDA would nonetheless avoid the Project's less-than-significant impacts (following mitigation) to subsurface historical resources that may be encountered during grading activities. Similarly, although there are no known archaeological resources on site, the NDA would avoid the Project's less-than-significant (with mitigation) impacts to subsurface archaeological resources that may be impacted during site grading operations. Additionally, because there would be no new grading on site, the NDA would avoid the Project's less-than-significant impacts (with mitigation) to buried human remains that may be uncovered during site grading activities. Thus, impacts to cultural resources would be reduced under the NDA in comparison to the Project.



F. Energy

Under the NDA, there would be no increase in demand from the Project site for energy resources. As such, the NDA would avoid the Project's less-than-significant impacts due to the wasteful, inefficient, or unnecessary consumption of energy resources. Neither the Project nor the NDA would conflict with a State or local plan for renewable energy or energy efficiency, although impacts would be reduced under the NDA in comparison to the Project because the NDA would not result in an increase in use of energy resources.

G. Geology and Soils

Under the NDA, there would be no new development on site. There are no known faults on or trending towards the Project site; thus, impacts associated with rupture of a known fault would be less than significant and similar under the proposed Project and the NDA. However, because the Project would involve a substantial increase in the number of employees on site, the Project's less-than-significant impacts due to strong seismic ground shaking would be reduced under the NDA. Because no new development would occur, the NDA would result in reduced impacts as compared to the Project's less-than-significant impacts (with mitigation) due to unstable geologic units or soils that are unstable and that potentially could result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazard. The Project's less-than-significant impacts (with mitigation) due to ground subsidence also would be reduced under the NDA. Neither the Project nor the NDA would be subject to geologic hazards, such as seiches, mudflow, or volcanic hazards; impacts would be less than significant and the level of impact would be similar. Because there would be no new development on site, the NDA would avoid the Project's less-than-significant impacts (after mitigation) due to cut or fill slopes greater than 2:1 or higher than 10 feet. Neither the Project nor the NDA would result in grading that affects or negates subsurface sewage disposal systems, and neither the Project nor the NDA would require septic tanks or alternative waste water disposal systems on unsuitable soils; thus, impacts would be less than significant and similar under the NDA and proposed Project. During construction of the proposed Project vegetative cover would be removed, increasing the potential for erosion as compared to the site's existing conditions; thus, the NDA would avoid the Project's less-than-significant erosion impacts during construction. However, for the proposed Project under long-term conditions, the Project site's potential for erosion would be substantially reduced as compared to existing conditions due to the introduction of impervious surfaces and landscaped areas on site; thus, impacts under long-term conditions due to erosion would be increased under the NDA as compared to long-term operations associated with the Project. Lastly, the NDA would avoid the Project's less-than-significant impacts (after mitigation) due to expansive soils.

H. Greenhouse Gas Emissions

Under the NDA, there would be no new development or construction activities on site. As such, the NDA would completely avoid the Project's significant and unavoidable impacts due to GHG emissions. Similarly, the Project's less-than-significant impacts due to a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs also would be avoided with implementation of the NDA.



I. Hazards and Hazardous Materials

Under the NDA, there would be no new development on site. As such, there would be no requirement under the NDA to remediate soil contamination due to pesticides on site; thus, impacts due to existing hazardous site conditions would be increased under the NDA as compared to the Project, although impacts still would remain below a level of significance because the site would not include any residential or other sensitive land uses under the NDA. There would be no construction activities or changes to operational conditions on site under the NDA; thus, the NDA would result in reduced impacts in comparison to the Project's less-than-significant construction and operational impacts due to hazardous materials. Neither the Project nor the NDA would impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan; thus, impacts under the NDA and proposed Project would be less than significant and the level of impact would be similar. Although neither the Project nor the NDA would emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, because there would be no change in the site's existing conditions impacts to nearby schools would be reduced in comparison to the Project's less-than-significant impacts. The Project site is not identified on any lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5; thus, no impact would occur under the Project or NDA, and the level of impact would be similar. In addition, the Project site is not located within two miles of a public or private airport and is not located within an airport land use plan; thus, no impacts due to airport-related safety hazards would occur under the NDA or proposed Project, and the level of impact would be similar.

J. Hydrology and Water Quality

With respect to water quality, the NDA would not involve any new development on site. With exception of erosion potential, the NDA would result in reduced impacts to water quality as compared to the proposed Project's less-than-significant water quality impacts. While the risk of erosion would increase during construction of the proposed Project, under long-term operating conditions the Project would result in the introduction of impervious surfaces and landscaped areas; thus, long-term operational erosion impacts would be increased under the NDA due to the lack of vegetative cover on portions of the Project site. While the Project would result in less-than-significant impacts due to groundwater recharge, impacts to groundwater recharge would be reduced under the NDA because there would be no new impervious surfaces on site. Although the Project would result in less-than-significant impacts to the site's existing drainage pattern, because there would be no changes to the site's drainage patterns under the NDA impacts would be reduced in comparison to the proposed Project. Similarly, although the Project would not exceed the capacity of any existing or planned stormwater drainage systems, because there would be no changes to site drainage under the NDA impacts would be reduced in comparison to the Project. The portions of the Project site proposed for development as part of the Project are not subject to flood hazards; thus, impacts due to flooding would be less than significant and would be similar under the Project and NDA. The Project site is not subject to inundation from flood hazards, tsunamis, or seiches; thus, impacts would be less than significant and would be similar under the Project and NDA.



K. Land Use and Planning

The NDA would not be consistent with the land use designations applied to the property by the Riverside County General Plan, Elsinore Area Plan (EAP), and SP 333, and impacts would be increased as compared to the proposed Project. Neither the Project nor the NDA would conflict with the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Additionally, neither the Project nor the NDA would disrupt or divide the physical arrangement of an established community; thus, impacts would be less than significant and the level of impact would be similar.

L. Mineral Resources

The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, no impacts to mineral resources would occur under the Project or the NDA, and the level of impact would be similar. Additionally, neither the Project nor the NDA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and the NDA and Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines. No impacts would occur, and the level of impact would be similar.

M. Noise

The Project site is located outside of areas subject to public and private airport-related noise levels exceeding 55 dBA CNEL; thus, impacts due to airport-related noise would be less than significant under both the Project and the NDA. The NDA would avoid the Project's less-than-significant impacts (after mitigation) due to construction-related and nighttime operational noise levels, and would avoid the Project's less-than-significant impacts due to traffic-related noise impacts to study area roadway segments because there would be no new development and no increase in traffic generated by the site under the NDA. Additionally, the NDA would avoid the Project's less-than-significant (with mitigation) impacts due to construction-related vibration, and also would avoid the Project's less-than-significant impacts due to operational-related vibration.

N. Paleontological Resources

Under the NDA, there would be no new construction or development on site. Therefore, the NDA would avoid the Project's less-than-significant construction-related impacts (after mitigation) to paleontological resources that may be buried beneath the site's surface.

O. Population and Housing

Neither the Project nor the NDA would eliminate any residents or housing or generate any demand for additional housing. Thus, impacts due to the displacement of substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, would be less than significant under both the Project and the NDA, although the level of impact would be slightly increased under the Project due to the generation of employees and the potential indirect demand for new housing. Although the Project would result in less-than-significant impacts due to substantial unplanned population growth, the NDA would not result in any new development on site; thus, impacts under the NDA would be reduced in comparison to the proposed Project.



P. Public Services

There would be no new development on site under the NDA; thus, the NDA would avoid the Project's less-than-significant impacts to fire protection, police protection, school services, library services, and health services.

Q. Recreation

The Project does not include any residential uses or other land use that may generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities. Likewise, the NDA would not result in any new development on site and thus would not generate any increase in demand for recreational resources, nor would any recreational resources be constructed on site under the NDA. Therefore, impacts to recreation would be similar under the Project and the NDA, although impacts due to the construction of recreational facilities (i.e., trails) would be reduced under the NDA as compared to the proposed Project.

R. Transportation

Under the NDA, there would be no new development on site and thus there would be no increase in traffic generated by the site. As such, the NDA would avoid the Project's significant and unavoidable impacts due to VMT and would avoid the Project's less-than-significant impacts to study area transportation facilities. Additionally, due to the lack of improvements, the NDA would avoid the Project's less-than-significant impacts due to increased hazards due to a geometric design feature or incompatible uses. The NDA also would avoid the Project's less-than-significant impacts due to the need for new or altered maintenance of roads. The NDA would not involve a construction phase, and thus would avoid the Project's less-than-significant impacts to circulation during construction activities on site. The NDA would not result in any impacts due to emergency access or access to nearby uses; thus, the NDA would avoid the Project's less-than-significant (after mitigation) impacts to emergency access during construction activities. No new bike lanes or trails would be constructed under the NDA; thus, the NDA would avoid the Project's less-than-significant impacts due to trail construction.

S. Tribal Cultural Resources

There would be no new development on site under the NDA. Accordingly, the NDA would avoid the Project's less-than-significant impacts (after mitigation) to tribal cultural resources.

T. Utilities and Service Systems

Under the NDA, there would be no increased demand for water, wastewater treatment, or storm water drainage; thus, the NDA would avoid the Project's less-than-significant impacts due to the construction of such facilities and due to the provision of water or wastewater treatment services. There would be no increase in demand for water resources under the NDA; thus, the NDA would avoid the Project's less-than-significant impacts to water supply. Additionally, the NDA would avoid the Project's less-than-significant impacts due to the construction of wastewater conveyance facilities on and off site, and would avoid the Project's less-than-significant impacts to wastewater treatment capacity. There would be no increase in solid waste generated on



site; thus, the NDA would avoid the Project's less-than-significant impacts due to solid waste. There are no components of the NDA or the proposed Project that would conflict with federal, State, and local management and reduction statutes and regulations related to solid wastes, including the CIWMP (County Integrated Waste Management Plan); thus, impacts would be less than significant and the level of impact would be similar. The NDA also would avoid the Project's less-than-significant impacts due to the construction of facilities for electricity, natural gas, communication systems, street lighting, or due to increased roadway maintenance.

U. Wildfire

Under the NDA, there would be no new development on site. Although impacts due to wildfire would be less than significant under the proposed Project, the NDA would result in reduced impacts due to wildfires because the NDA would not involve the construction of any new structures on site. However, under the NDA the Project site would remain in its existing undeveloped condition, and the natural vegetation that occurs on site under existing conditions could serve as potential fuel for future wildfires in the local area; thus, impacts due to wildland fire hazards associated with existing vegetation at the site would be increased under the NDA as compared to the proposed Project.

V. Conclusion

Implementation of the NDA would result in no physical environmental impacts beyond those that have historically occurred on the property. Almost all effects of the proposed Project would be avoided or lessened by the selection of this Alternative, although a few new impacts, such as sedimentation impacts, contaminated soils, General Plan land use consistency, and wildfire hazards (on site) would be increased under this Alternative. Because this Alternative would avoid most of the Project's impacts, it warrants consideration as the "environmentally superior alternative." However, pursuant to State CEQA Guidelines § 15126.6(e)(2), if a no project alternative is identified as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Accordingly, the Reduced Project Alternative, as discussed in subsection 6.3.3, is identified as the environmentally superior alternative.

The NDA would fail to meet all of the Project's objectives. Specifically, the NDA would not result in the efficient development of an underutilized property with a complementary mix of employment-generating land uses, including light industrial and business park land uses. The NDA also would not assist the SCAG region in achieving jobs/housing balance region-wide and in the local area by providing additional job opportunities in a housing rich area of the Inland Empire that will reduce the need for members of the local workforce to commute outside the area for employment. Additionally, the NDA would not expand economic development, facilitate job creation, or increase the tax base for Riverside County by accommodating and diversifying facilities needed to support the goods movement supply chain. The NDA would not entail the establishment of development standards and design guidelines to ensure future development on site complements other existing and planned uses in the immediate vicinity and minimizes conflicts with other nearby land uses. In addition, the NDA would not result in the establishment of a unified thematic concept for future development through design elements such as architecture, monumentation, theme walls, and landscaping using a long-range comprehensive planning approach that cannot be accomplished on a parcel-by-parcel basis. Furthermore, the NDA would not provide for a mixture of light industrial and business park land uses in a



master-planned commerce center that would be marketable within the evolving economic profile of western Riverside County. The NDA also would not result in the development of a mix of light industrial and business park uses in unincorporated Riverside County that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar uses in the local area and region. Finally, the NDA would not result in the development of a property that has access to available infrastructure, including roads and utilities.

6.3.2 NO PROJECT (ADOPTED SPECIFIC PLAN) ALTERNATIVE (NPA)

As previously described, under the “No Project Alternative (NPA),” the 157.1-acre property would be developed in accordance with the site’s existing General Plan and Specific Plan land uses. Figure 2-5 in EIR Subsection 2.0 depicts the site’s existing Specific Plan land use designations. Thus, under this alternative, and consistent with the adopted SP 333, the Project site would be developed with 355 Medium Density Residential dwelling units on 98.7 acres, with minimum lot sizes ranging from 5,000 s.f. to 8,000 s.f. in size; a Community Park on 4.3 acres; four pocket parks on 2.0 acres; Open Space/Conservation land uses on 27.1 acres; and Open Space/Drainage uses on 25.7 acres. This Alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would allow for buildout of the Project site in accordance with the site’s existing General Plan and SP 333 land use designations.

A. Aesthetics

The Project site is not located within the viewshed of any officially designated State or County scenic highways or State-Eligible scenic highways. Development under the Project and NPA would be visible from I-15, which is designated as a State-Eligible scenic highway; however, development on site under both the Project and NPA would be required to comply with the development standards and design guidelines included in the adopted or proposed SP 333, which have been designed to ensure that the property is developed in a manner that is not aesthetically offensive. Thus, impacts to scenic corridors would be less than significant under both the Project and NPA, and the level of impact would be similar. As with the proposed Project, the NPA would not substantially damage scenic resources; obstruct any prominent scenic vista or view open to the public; result in the creation of an aesthetically offensive site open to public view; substantially degrade the existing visual quality or character of the site or its surroundings; or conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant under both the Project and NPA, and the level of impact would be similar.

B. Agriculture and Forestry Resources

Under both the NPA and the proposed Project, a majority of the Project site would be subject to grading and development, with exception of the 27.1 acres located in the eastern portions of the site that would be conserved as “Open Space – Conservation (OS-C)” areas under both the Project and the NPA. As such, both the NPA and the proposed Project would result in significant and unavoidable impacts due to the conversion of approximately 80.0 acres of “Farmland of Local Importance” to non-agricultural use, and the level of impact would be the same. Due to distance to the nearest agriculturally-zoned property, there are no components of the Project or the NPA that have the potential to adversely affect agricultural uses on the nearest agriculturally-zoned property. Therefore, the Project and the NPA would not conflict with existing agricultural zoning, and



impacts would be less than significant and the level of impact would be similar. However, the NPA would result in the introduction of residential uses on site, whereas the Project would entail only non-residential development. Thus, impacts to existing agricultural uses would be increased under the NPA as compared to the Project, although impacts would be less than significant. Additionally, the Project site is not subject to a Williamson Act contract and is not located within any County Agricultural Preserves, and there are no components of the proposed Project or the NPA that have the potential to adversely affect agricultural operations at the nearest agricultural preserve/Williamson Act-contracted lands. As such, impacts to agricultural preserves and Williamson Act-contracted lands would be less than significant under both the Project and the NPA, and the level of impact would be the same.

C. *Air Quality*

Based on the level of intensity allowed by the adopted SP 333, implementation of the NPA is expected to result in emissions that would not exceed the SCAQMD Regional Thresholds for criteria pollutants. Additionally, the NPA is consistent with the growth forecasts assumed by the 2016 SCAQMD AQMP; thus, the NPA would not conflict with the implementation of the air quality reductions called for by the SCAQMD AQMP. Thus, the Project's significant and unavoidable impacts due to a conflict with the SCAQMD 2016 AQMP would be avoided under the NPA. As the level of intensity for development on site would be similar under the NPA and proposed Project, it is expected that construction-related emissions under both the NPA and the proposed Project would be less than significant with mitigation. For long-term operational conditions, the NPA would generate substantially less traffic than the proposed Project; thus, it is expected that the NPA would avoid the Project's significant and unavoidable impacts due to operational emissions of ROG_s and NO_x. With respect to localized emissions, the NPA would result in the generation of substantially fewer diesel truck trips as compared to the Project; thus, cancer risks and non-cancer health hazards would be reduced under the NPA as compared to the Project, although impacts would be below the thresholds of significance under both the Project and NPA. Neither the Project nor the NPA would result in or contribute to CO "hot spots," and impacts would be less than significant with the level of impact being similar. Both the Project and the NPA are anticipated to result in less-than-significant impacts due to odors, although odors would be slightly reduced under the NPA due to the substantial reduction in diesel truck trips.

D. *Biological Resources*

Under both the NPA and the proposed Project, a majority of the Project site would be subject to grading and development, with exception of the 27.1 acres located in the eastern portions of the site that would be conserved as open space under both the Project and the NPA. As such, impacts to biological resources under the NPA would be the same as for the proposed Project, and would be reduced to less-than-significant levels with the implementation of mitigation measures.

E. *Cultural Resources*

Under both the NPA and the proposed Project, a majority of the Project site would be subject to grading and development, with exception of the 27.1 acres located in the eastern portions of the site that would be conserved as open space under both the Project and the NPA. Both the Project and the NPA would result in less-than-significant impacts to previously undiscovered subsurface historical resources with the implementation of



mitigation measures, and the potential impact to previously-undiscovered historical resources would be the same under the NPA and the proposed Project. Similarly, both the Project and NPA would result in less-than-significant impacts to previously-undiscovered archaeological resources and human remains with the implementation of mitigation measures, and the level of impact would be the same under the NPA and the Project.

F. Energy

Based on the rates utilized in Riverside County EIR No. 521, which was prepared to evaluate the County's 2015 General Plan Update, the NPA is projected to result in a demand for 1,997,230 kilowatt hours per year of electricity and 28,392,900 cubic feet per year of natural gas (Riverside County, 2015, Tables 5.5-O and 5.5-P). Additionally, based on rates published by the Institute of Transportation Engineers (ITE) as part of its Trip Generation Manual (10th Edition, 2017), the NPA would result in the generation of approximately 3,351 vehicular trips per day, as compared to the 5,422 vehicular trips per day (actual vehicles) that would be generated by the Project. Thus, the NPA would result in reduced demand for transportation-related energy resources as compared to the proposed Project. Additionally, it is estimated that operational-related non-vehicular energy consumption would be reduced under the NPA as compared to the proposed Project. Neither the Project nor the NPA would result in the inefficient, wasteful, or unnecessary consumption of energy and impacts would be less than significant. Additionally, both the Project and NPA would be required to comply with adopted State and local plans related to energy conservation; thus, impacts would be less than significant and the level of impact would be similar.

G. Geology and Soils

There are no known faults on or trending towards the Project site; thus, impacts associated with rupture of a known fault would be less than significant and similar under the proposed Project and the NPA. However, the NPA is projected to result in a future residential population of approximately 1,129 residents, whereas the Project is anticipated to generate approximately 2,436 employees; thus, because the NPA would result in fewer people on site as compared to the Project, the Project's less-than-significant impacts due to strong seismic ground shaking would be reduced under the NPA (Riverside County, 2021a, Appendix E-2, Table E-2). Because development would occur over approximately the same area under the NPA and proposed Project, impacts due to unstable geologic units or soils that are unstable and that potentially could result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazard would be similar and would be less than significant with the implementation of mitigation measure. Impacts associated with ground subsidence also would be similar under the Project and NPA and would be less than significant with mitigation. Neither the Project nor the NPA would be subject to geologic hazards, such as seiches, mudflow, or volcanic hazards; impacts would be less than significant and the level of impact would be similar. Grading activities would be similar under the Project and NPA; thus, impacts due to cut or fill slopes greater than 2:1 or higher than 10 feet would be similar and would be less than significant with the implementation of mitigation measures. Both the Project and NPA would be subject to mitigation measures to reduce impacts due to potential septic systems on site to less-than-significant levels, and the level of impact would be similar. Neither the Project nor the NPA would require septic tanks or alternative waste water disposal systems on unsuitable soils; thus, impacts would be less than significant and similar under the NPA and proposed Project. Similarly, impacts due to erosion



hazards during construction and long-term operation would be similar under the NPA and proposed Project and impacts would be less than significant. Both the Project and NPA would require remediation of expansive soils on site; thus, impacts associated with expansive soils would be similar and would be less than significant with mitigation.

H. Greenhouse Gas Emissions

As previously noted, the NPA would result in the generation of approximately 3,351 vehicular trips per day, as compared to the 5,422 vehicular trips per day (actual vehicles) that would be generated by the Project. Because a majority of GHG emissions are associated with vehicular traffic, the Project would result in the generation of more GHG emissions than the NPA. As such, impacts due to GHG emissions would be reduced under the NPA as compared to the proposed Project, although impacts likely would be significant and unavoidable under both the Project and NPA. Neither the Project nor the NPA would conflict with applicable plans, policies, or regulations related to GHGs; thus, impacts would be less than significant and the level of impact would be similar.

I. Hazards and Hazardous Materials

Soil remediation to address existing soil contamination due to pesticides would be required under both the Project and NPA; thus, impacts due to existing site hazards would be less than significant with mitigation under both the Project and NPA, and the level of impact would be similar. The potential for hazardous materials under construction activities would be similar under the Project and NPA, and impacts would be less than significant. However, under long-term operational conditions, the Project has the potential to include businesses that handle hazardous materials whereas the NPA would consist of a residential community. Thus, although long-term operational impacts due to hazards and hazardous materials would be less than significant under both the Project and NPA, the level of impact would be decreased under the NPA. Neither the Project nor the NPA would impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan; thus, impacts under the NPA and proposed Project would be less than significant and the level of impact would be similar. Although neither the Project nor the NPA would emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, because the Project would involve businesses that have the potential for storage of hazardous materials impacts to nearby schools would be reduced in comparison to the Project's less-than-significant impacts. The Project site is not identified on any lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5; thus, no impact would occur under the Project or NPA, and the level of impact would be similar. The Project site is not located within two miles of a public airport or within an airport land use plan; thus, neither the Project nor the NPA would result in impacts due to inconsistency with an Airport Master Plan, neither the Project nor the NPA would require review by the Airport Land Use Commission (ALUC), and neither the Project nor the NPA would result in an airport-related safety hazard for people working or residing in the area. Impacts associated with airport would be less than significant and the level of impact would be the same under the Project and NPA. The Project site is not located in the Airport Influence Area (AIA) of any private airports; thus, there would be no impacts due to private airport-related hazards and the level of impact would be the same.



J. Hydrology and Water Quality

Both the Project and the NPA would be subject to compliance with the Santa Ana Region Basin Plan, and would be required to comply with the requirements of the Santa Ana RWQCB and the County of Riverside. This includes the requirement to obtain a NPDES Municipal Stormwater Permit for construction activities, which requires the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that would include measures to address water pollution, including sedimentation. Additionally, both the Project and NPA would be subject to NPDES requirements for long-term operations, which would reduce potential water quality impacts (including sediments) from construction to less-than-significant levels. It is not expected that the Project or NPA would result in substantial changes to the existing drainage system of the Project site and area, as runoff from the developed portions of the property would be conveyed to existing culverts beneath the I-15; thus, impacts would be less than significant and the level of impact would be similar. Both the Project and NPA would be subject to future implementing hydrology studies as part of future implementing development (e.g., tentative tract maps, plot plans, etc.), which would be required to demonstrate adequate capacity to handle runoff from the Project site; thus, impacts related to exceeding the capacity of existing or planned stormwater drainage facilities would be less than significant and the level of impact would be similar. The areas of the Project site that would be subject to development under the Project and NPA are not subject to flood hazards, tsunamis, or seiche zones, and would have no impact on existing flood plains; thus, impacts due to pollution from inundation from flooding, tsunamis, and seiches would be less than significant, and the level of impact would be similar.

K. Land Use and Planning

Assuming approval of the Project's proposed General Plan Amendment, both the Project and the NPA would be fully consistent with the Riverside County General Plan and Elsinore Area Plan (EAP). Thus, impacts would be less than significant under both the Project and the NPA, and the level of impact would be similar. Both the Project and NPA also would be consistent with SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and as such impacts due to a conflict would be similar and less than significant. However, the NPA would be more compatible with existing residential uses located west and south of the Project site; thus, although the Project and NPA would have less-than-significant impacts due to land use compatibility, impacts would be reduced under the NPA as compared to the proposed Project. Additionally, neither the Project nor the NPA would disrupt or divide the physical arrangement of an established community; thus, impacts would be less than significant and the level of impact would be similar.

L. Mineral Resources

The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, no impacts to mineral resources would occur under the Project or the NPA, and the level of impact would be similar. Additionally, neither the Project nor the NPA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and the NPA and Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines. No impacts would occur, and the level of impact would be similar.



M. Noise

The Project site is located outside of areas subject to public and private airport-related noise levels exceeding 55 dBA CNEL; thus, impacts due to airport-related noise would be less than significant under both the Project and the NPA. Construction-related noise under the Project and NPA would be similar, and impacts due to construction noise would be reduced to below a level of significance under both the Project and NPA with the implementation of mitigation. Because the NPA would involve primarily residential development, noise impacts associated with long-term operations would be reduced under the NPA as compared to the Project, although operational impacts would be less than significant with the implementation of mitigation measures. With respect to transportation-related noise, the NPA would generate less traffic than the proposed Project; thus, transportation-related noise would be reduced under the NPA as compared to the proposed Project, although transportation-related noise impacts would be less than significant under both the Project and NPA. Construction-related vibration impacts would be similar under the Project and NPA, and impacts would be reduced to less-than-significant levels with the implementation of mitigation measures. Under long-term operations, because the NPA would involve fewer heavy trucks, operational vibration impacts would be reduced under the NPA in comparison to the Project, although impacts would be less than significant under both the Project and NPA.

N. Paleontological Resources

Under both the NPA and the proposed Project, a majority of the Project site would be subject to grading and development, with exception of the 27.1 acres located in the eastern portions of the site that would be conserved as open space under both the Project and the NPA. Thus, impacts to previously-undiscovered paleontological resources on site would be similar under the Project and the NPA, and would be reduced to less-than-significant levels with implementation of mitigation measures.

O. Population and Housing

The Project site does not contain any existing residences or housing, and neither the Project nor the NPA would displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. With respect to planned population growth, it is anticipated that a majority of the Project's anticipated 2,436 jobs would be filled by existing County residents, while the NPA would result in the development of 355 dwelling units on site. Thus, neither the Project nor the NPA would create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income, and the level of impact would be similar. Although the type of development on site would vary between the Project and the NPA, neither the NPA nor the Project would represent substantial unplanned population growth as the Project site is currently planned for urban land uses by the County's General Plan. Additionally, neither the Project nor the NPA would indirectly induce growth, as infrastructure improvements would be sized to accommodate only future development on site. Impacts to population and housing would be less than significant under both the Project and NPA, and the level of impact would be similar.



P. Public Services

The NPA would result in a similar level of development intensity on site as the proposed Project. As such, impacts to fire services, sheriff services, and health services would be similar and less than significant with payment of mandatory Development Impact Fees (DIF) in accordance with Riverside County Ordinance No. 659. The Project would not involve any residential development and is not anticipated to increase the County's residential population, whereas the NPA would involve the construction of up to 355 dwelling units; thus, impacts to recreational and library facilities would be increased under the NPA as compared to the Project, although impacts would be less than significant with payment of DIF fees and the development of up to 6.3 acres of parks under the NPA. Additionally, the NPA would result in up to 1,129 residential dwelling units while the Project does not involve any residential uses; thus, impacts to school services would be increased under the NPA as compared to the Project, although impacts would be reduced to less-than-significant levels under the NPA with mandatory payment of school impact fees pursuant to Senate Bill 50 (SB 50).

Q. Recreation

The Project does not entail any residential uses while the NPA would involve up to 355 dwelling units and would generate approximately 1,129 future residents. Thus, while the Project would not result in an increase in demand for recreational resources, the NPA would generate a demand for approximately 5.6 acres of parkland, based on the County's standard of 5.0 acres per 1,000 persons. The NPA would accommodate 6.3 acres of parks on site. Thus, impacts to recreation would be less than significant under both the Project and the NPA, although impacts under the NPA would be slightly increased due to the introduction of residential uses on site. Both the Project and NPA would involve the construction of recreational facilities on site, although such impacts would be inherent to the construction phase and the level of impact would be similar.

R. Transportation

Both the Project and the NPA would be conditioned to implement improvements and/or pay fair-share contributions to ensure that study area facilities achieve LOS D or better, in conformance with the applicable LOS standards of Riverside County and the City of Lake Elsinore; thus, impacts due to a conflict with a program, plan, ordinance, or policy addressing the circulation system would be less than significant under the Project and NPA, and the level of impact would be similar. Impacts due to hazardous geometric design features and incompatible uses would be less than significant under both the Project and the NPA, and the level of impact would be similar. Both the Project and the NPA would result in less-than-significant impacts due to the need for new or altered maintenance of roads. Both the Project and the NPA would have the potential to result in impacts to circulation during construction, including emergency access routes, although impacts would be reduced to less-than-significant levels with mitigation, and the level of impact after mitigation would be similar under the Project and NPA. Both the Project and NPA would be required to accommodate trails, although impacts associated with the construction of such trails have been evaluated herein, and both the Project and NPA would result in similar less-than-significant impacts due to trail facilities. With respect to VMT, the NPA would involve primarily the development of residential uses in a portion of the County that lacks employment opportunities. As such, it is anticipated that the NPA would result in increased VMT as compared to the proposed Project, although both the Project and NPA would result in significant and unavoidable impacts due to VMT.



S. Tribal Cultural Resources

Grading activities under the Project and NPA would be the same. As such, potential impacts to tribal cultural resources would be the same under the NPA and proposed Project, and impacts would be less than significant with implementation of mitigation measures.

T. Utilities and Service Systems

The level of development intensity on site would be similar under both the Project and NPA. Both the Project and NPA would require the construction of water, wastewater, storm water drainage, electric power, natural gas, and telecommunication facilities. Impacts associated with the provision of such facilities would be similar and would be mitigated to less-than-significant levels with implementation of mitigation measures. The EVMWD determined that it has sufficient water resources to accommodate development proposed as part of the Project, while the NPA is fully consistent with the growth assumptions used by EVMWD for long-term planning efforts. Thus, because EVMWD would be able to provide potable water to both the Project and the NPA, impacts to water supply would be less than significant and the level of impact would be similar. Similarly, EVMWD would have adequate capacity to treat wastewater generated by either the Project or the NPA; thus, impacts due to wastewater would be less than significant under both the Project and NPA, and the level of impact would be similar. Both the Project and NPA would be subject to the County's solid waste regulations, and neither the Project nor the NPA would result in the generation of solid waste that could adversely affect landfill capacity. Impacts associated with solid waste would be less than significant, and the level of impact would be similar under both the Project and NPA.

U. Wildfire

Both the Project and NPA would involve development of urban uses in adjacent to lands that are identified as having a high risk for wildfire hazards. Both the Project and NPA would be required to implement a Fire Protection Plan (FPP) to ensure that adequate provisions are accommodated, such as fuel management zones, to reduce the risk of wildfires. With implementation of mitigation and a FPP, impacts due to wildfires would be reduced to less-than-significant levels and the level of impact would be similar.

V. Conclusion

As compared to the proposed Project, the NPA would have increased impacts under the issue areas of agriculture and forestry resources, public services (recreation, schools, and libraries), and recreation. The NPA would result in the same or similar impacts as the proposed Project under the issue areas of aesthetics, biological resources, cultural resources, geology/soils (except for seismic hazards), hydrology/water quality, mineral resources, paleontological resources, population/housing, public services (fire, sheriff, and health services), tribal cultural resources, utilities/service systems, and wildfire. The NPA would result in reduced impacts under the issue areas of air quality, energy, geology/soils (due to seismic hazards), greenhouse gas emissions, hazards/hazardous materials, land use/planning, noise, and transportation.



The NPA generally would not meet the Project's objectives. The NPA would not result in the efficient development of an underutilized property with a complementary mix of employment-generating land uses, including light industrial and business park land uses. The NPA also would not assist the SCAG region in achieving jobs/housing balance region-wide and in the local area by providing additional job opportunities in a housing rich area of the Inland Empire that will reduce the need for members of the local workforce to commute outside the area for employment. The NPA would not expand economic development, facilitate job creation, or increase the tax base for Riverside County by accommodating and diversifying facilities needed to support the goods movement supply chain. Because the NPA would be subject to the development standards and design guidelines of the adopted SP 333, the NPA would meet the Project's objective to establish development standards and design guidelines to ensure future development on site complements other existing and planned uses in the immediate vicinity and minimizes conflicts with other nearby land uses. Similarly, the NPA would meet the Project's objective to establish a unified thematic concept for future development through design elements such as architecture, monumentation, theme walls, and landscaping using a long-range comprehensive planning approach that cannot be accomplished on a parcel-by-parcel basis. However, the NPA would not meet the Project's objective to anticipate market demand by providing a mixture of light industrial and business park land uses in a master-planned commerce center that would be marketable within the evolving economic profile of western Riverside County. Also, the NPA would not meet the Project's objective to develop a mix of light industrial and business park uses in unincorporated Riverside County that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar uses in the local area and region. The NPA would, however, meet the Project's objective to develop a property that has access to available infrastructure, including roads and utilities.

6.3.3 REDUCED PROJECT ALTERNATIVE (RPA)

The Reduced Project Alternative (RPA) considers development of the Project site in a manner similar to the proposed Project, but with a reduced development intensity. Specifically, proposed Business Park and Light Industrial land uses would be developed at a maximum Floor Area Ratio (FAR) of 0.35, in lieu of the 0.50 FAR proposed as part of the Project. As with the proposed Project, Light Industrial building area is assumed to consist of approximately 20% "High-Cube Cold Storage" uses, 35% "High-Cube Fulfillment Center" uses, 35% "High Cube Warehouse" uses, and 10% "Manufacturing" uses, while Business Park building area is assumed to consist of approximately 60% "Industrial Park" uses and 40% "Warehouse" uses. As previously summarized in Table 6-1, the RPA would result in up to 274,428 s.f. of Business Park land uses and 1,481,911 s.f. of Light Industrial uses, for a total of 1,756,339 s.f. of building area. All other components of the RPA would be identical to the proposed Project, including areas planned for physical impacts/improvements both on and off site. This alternative was selected by the Lead Agency in order to evaluate an alternative that would reduce the Project's significant and unavoidable impacts to air quality and transportation.

A. Aesthetics

The Project site is not located within the viewshed of any officially designated State or County scenic highways or State-Eligible scenic highways. Development under the Project and RPA would be visible from I-15, which is designated as a State-Eligible scenic highway; however, development on site under both the Project and



RPA would be required to comply with the development standards and design guidelines included in the adopted or proposed SP 333, which have been designed to ensure that the property is developed in a manner that is not aesthetically offensive. Thus, impacts to scenic corridors would be less than significant under both the Project and RPA, although the level of impact would be slightly reduced under the RPA due to the reduction in building area. As with the proposed Project, the RPA would not substantially damage scenic resources; obstruct any prominent scenic vista or view open to the public; result in the creation of an aesthetically offensive site open to public view; substantially degrade the existing visual quality or character of the site or its surroundings; or conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant under both the Project and RPA, although the level of impact would be slightly reduced under the RPA due to the reduction in building intensity on site.

B. Agriculture and Forestry Resources

Under both the RPA and the proposed Project, a majority of the Project site would be subject to grading and development, with exception of the 27.1 acres located in the eastern portions of the site that would be conserved as “Open Space – Conservation (OS-C)” areas under both the Project and the RPA. As such, both the RPA and the proposed Project would result in significant and unavoidable impacts due to the conversion of approximately 80.0 acres of “Farmland of Local Importance” to non-agricultural use, and the level of impact would be the same. Due to distance to the nearest agriculturally-zoned property, there are no components of the Project or the RPA that have the potential to adversely affect agricultural uses on the nearest agriculturally-zoned property. Therefore, the Project and the RPA would not conflict with existing agricultural zoning, and impacts would be less than significant and the level of impact would be similar. Light industrial and business park uses are proposed under both the Project and RPA, and such uses would not conflict with any existing agricultural uses; impacts would be less than significant and the level of impact would be the same. Additionally, the Project site is not subject to a Williamson Act contract and is not located within any County Agricultural Preserves, and there are no components of the proposed Project or the RPA that have the potential to adversely affect agricultural operations at the nearest agricultural preserve/Williamson Act-contracted lands. As such, impacts to agricultural preserves and Williamson Act-contracted lands would be less than significant under both the Project and the RPA, and the level of impact would be the same.

C. Air Quality

Implementation of the RPA would result in approximately 30% less building area as compared to the proposed Project. As such, the RPA would result in a substantial reduction in air quality emissions as compared to the proposed Project. As with the proposed Project, with mitigation, construction activities associated with the RPA would not result in emissions exceeding the SCAQMD Regional Thresholds. For long-term operations, and assuming an approximate 30% reduction in overall emissions, the RPA would not exceed the SCAQMD Regional Threshold for ROG, but would exceed the SCAQMD Regional Threshold for NO_x. Accordingly, implementation of the RPA would reduce, but would not completely avoid, the Project’s significant and unavoidable impacts due to a conflict with the 2016 SCAQMD AQMP. Additionally, the RPA would avoid the Project’s significant and unavoidable operational impacts due to ROG emissions. However, the RPA would substantially reduce, but would not completely avoid, the Project’s significant and unavoidable impacts due to emissions of NO_x that exceed the SCAQMD Regional Thresholds. With respect to localized emissions,



the RPA would result in the generation of substantially fewer diesel truck trips as compared to the Project; thus, cancer risks and non-cancer health hazards would be reduced under the RPA as compared to the Project, although impacts would be below the thresholds of significance under both the Project and RPA. Neither the Project nor the RPA would result in or contribute to CO “hot spots,” and impacts would be less than significant with the level of impact being similar. Both the Project and the RPA are anticipated to result in less-than-significant impacts due to odors, although odors would be slightly reduced under the RPA due to the substantial reduction in diesel truck trips.

D. Biological Resources

Under both the RPA and the proposed Project, a majority of the Project site would be subject to grading and development, with exception of the 27.1 acres located in the eastern portions of the site that would be conserved as open space under both the Project and the RPA. As such, impacts to biological resources under the RPA would be the same as for the proposed Project, and would be reduced to less-than-significant levels with the implementation of mitigation measures.

E. Cultural Resources

Under both the RPA and the proposed Project, a majority of the Project site would be subject to grading and development, with exception of the 27.1 acres located in the eastern portions of the site that would be conserved as open space under both the Project and the RPA. Both the Project and the RPA would result in less-than-significant impacts to previously undiscovered subsurface historical resources with the implementation of mitigation measures, and the potential impact to previously-undiscovered historical resources would be the same under the RPA and the proposed Project. Similarly, both the Project and RPA would result in less-than-significant impacts to previously-undiscovered archaeological resources and human remains with the implementation of mitigation measures, and the level of impact would be the same under the RPA and the Project.

F. Energy

Under the RPA, energy used during construction activities would be reduced in comparison to the proposed Project due to the reduced intensity of construction activities on site. Additionally, implementation of the RPA would result in an approximate 30% reduction in energy demands as compared to the proposed Project, and also would result in an approximately 30% reduction in fuel consumption associated with operational traffic. Neither the Project nor the RPA would result in the inefficient, wasteful, or unnecessary consumption of energy and impacts would be less than significant. Additionally, both the Project and RPA would be required to comply with adopted State and local plans related to energy conservation. Impacts due to energy consumption would be less than significant under both the Project and RPA, although impacts under the RPA would be reduced in comparison to the Project due to the reduction in development intensity on site.

G. Geology and Soils

There are no known faults on or trending towards the Project site; thus, impacts associated with rupture of a known fault would be less than significant and similar under the proposed Project and the RPA. However, the



RPA is projected to result in approximately 1,705 employees (based on the rates depicted in EIR Table 3-2), whereas the Project is anticipated to generate approximately 2,436 employees; thus, because the RPA would result in fewer people on site as compared to the Project, the Project's less-than-significant impacts due to strong seismic ground shaking would be reduced under the RPA (Riverside County, 2021a, Appendix E-2, Table E-5). Because development would occur over approximately the same area under the RPA and proposed Project, impacts due to unstable geologic units or soils that are unstable and that potentially could result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazard would be similar and would be less than significant with the implementation of mitigation. Impacts associated with ground subsidence also would be similar under the Project and RPA and would be less than significant with mitigation. Neither the Project nor the RPA would be subject to geologic hazards, such as seiches, mudflow, or volcanic hazards; impacts would be less than significant and the level of impact would be similar. Grading activities would be similar under the Project and RPA; thus, impacts due to cut or fill slopes greater than 2:1 or higher than 10 feet would be similar and would be less than significant with the implementation of mitigation measures. Both the Project and RPA would be subject to mitigation measures to reduce impacts due to potential septic systems on site to less-than-significant levels, and the level of impact would be similar. Neither the Project nor the RPA would require septic tanks or alternative waste water disposal systems on unsuitable soils; thus, impacts would be less than significant and similar under the RPA and proposed Project. Similarly, impacts due to erosion hazards during construction and long-term operation would be similar under the RPA and proposed Project and impacts would be less than significant. Both the Project and RPA would require remediation of expansive soils on site; thus, impacts associated with expansive soils would be similar and would be less than significant with mitigation.

H. Greenhouse Gas Emissions

Implementation of the RPA would result in an overall reduction in traffic by approximately 30%. Because a majority of GHG emissions are associated with vehicular traffic, the Project would result in the generation of more GHG emissions than the RPA. As such, impacts due to GHG emissions would be reduced under the RPA as compared to the proposed Project, although impacts still would be significant and unavoidable, as it is anticipated that the RPA would exceed the CAP Update screening threshold of 3,000 MTCO₂e/yr. Neither the Project nor the RPA would conflict with applicable plans, policies, or regulations related to GHGs; thus, impacts would be less than significant and the level of impact would be similar.

I. Hazards and Hazardous Materials

Soil remediation to address existing soil contamination due to pesticides would be required under both the Project and RPA; thus, impacts due to existing site hazards would be less than significant with mitigation under both the Project and RPA, and the level of impact would be similar. The potential for hazardous materials under construction activities would be similar under the Project and RPA, and impacts would be less than significant. Under long-term operational conditions, the Project and the RPA have the potential to include businesses that handle hazardous materials, although under the RPA there would be approximately 30% less building area. Thus, although long-term operational impacts due to hazards and hazardous materials would be less than significant under both the Project and RPA, the level of impact would be decreased under the RPA. Neither the Project nor the RPA would impair implementation of or physically interfere with an adopted



emergency response plan or an emergency evacuation plan; thus, impacts under the RPA and proposed Project would be less than significant and the level of impact would be similar. Although neither the Project nor the RPA would emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, because the Project and RPA would involve less light industrial and business park building area, impacts to nearby schools would be reduced in comparison to the Project's less-than-significant impacts. The Project site is not identified on any lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5; thus, no impact would occur under the Project or RPA, and the level of impact would be similar. The Project site is not located within two miles of a public airport or within an airport land use plan; thus, neither the Project nor the RPA would result in impacts due to inconsistency with an Airport Master Plan, neither the Project nor the RPA would require review by the Airport Land Use Commission (ALUC), and neither the Project nor the RPA would result in an airport-related safety hazard for people working or residing in the area. Impacts associated with airport would be less than significant and the level of impact would be the same under the Project and RPA. The Project site is not located in the Airport Influence Area (AIA) of any private airports; thus, there would be no impacts due to private airport-related hazards and the level of impact would be the same.

J. Hydrology and Water Quality

Both the Project and the RPA would be subject to compliance with the Santa Ana Region Basin Plan, and would be required to comply with the requirements of the Santa Ana RWQCB and the County of Riverside. This includes the requirement to obtain a NPDES Municipal Stormwater Permit for construction activities, which requires the preparation and implementation of a SWPPP that would include measures to address water pollution, including sedimentation. Additionally, both the Project and RPA would be subject to NPDES requirements for long-term operations, which would reduce potential water quality impacts (including sediments) from construction to less-than-significant levels. It is not expected that the Project or RPA would result in substantial changes to the existing drainage system of the Project site and area, as runoff from the developed portions of the property would be conveyed to existing culverts beneath the I-15; thus, impacts would be less than significant and the level of impact would be similar. Both the Project and RPA would be subject to future implementing hydrology studies as part of future implementing development (e.g., tentative tract maps, plot plans, etc.), which would be required to demonstrate adequate capacity to handle runoff from the Project site; thus, impacts related to exceeding the capacity of existing or planned stormwater drainage facilities would be less than significant and the level of impact would be similar. The areas of the Project site that would be subject to development under the Project and RPA are not subject to flood hazards, tsunamis, or seiche zones, and would have no impact on existing flood plains; thus, impacts due to pollution from inundation from flooding, tsunamis, and seiches would be less than significant, and the level of impact would be similar.

K. Land Use and Planning

Both the Project and the RPA would require a General Plan Amendment, Specific Plan Amendment, and Change of Zone to accommodate the proposed uses. With approval of these applications, both the Project and RPA would be fully consistent with the Riverside County General Plan and Elsinore Area Plan (EAP). Thus, impacts would be less than significant under both the Project and the RPA, and the level of impact would be similar. Both the Project and RPA also would be consistent with SCAG's 2020-2045 Regional Transportation



Plan/Sustainable Communities Strategy (RTP/SCS), and as such impacts due to a conflict would be similar and less than significant. Both the Project and the RPA would introduce light industrial and business park land uses adjacent to existing residential uses to the west and south of the Project site, although the level of development intensity on site under the RPA would be substantially reduced in comparison to the Project. Thus, although the Project and RPA would have less-than-significant impacts due to land use compatibility, impacts would be reduced under the RPA as compared to the proposed Project. Additionally, neither the Project nor the RPA would disrupt or divide the physical arrangement of an established community; thus, impacts would be less than significant and the level of impact would be similar.

L. Mineral Resources

The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, no impacts to mineral resources would occur under the Project or the RPA, and the level of impact would be similar. Additionally, neither the Project nor the RPA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and the RPA and Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines. No impacts would occur, and the level of impact would be similar.

M. Noise

The Project site is located outside of areas subject to public and private airport-related noise levels exceeding 55 dBA CNEL; thus, impacts due to airport-related noise would be less than significant under both the Project and the RPA. Construction-related noise under the Project and RPA would be slightly reduced in comparison to the Project due to the reduction in building area, and impacts due to construction noise would be reduced to below a level of significance under both the Project and RPA with the implementation of mitigation. Because the RPA would involve less light industrial and business park building area as compared to the Project, noise impacts associated with long-term operations would be reduced under the RPA as compared to the Project, although operational impacts would be less than significant with the implementation of mitigation measures. With respect to transportation-related noise, the RPA would generate less traffic than the proposed Project; thus, transportation-related noise would be reduced under the RPA as compared to the proposed Project, although transportation-related noise impacts would be less than significant under both the Project and RPA. Construction-related vibration impacts would be similar under the Project and RPA, and impacts would be reduced to less-than-significant levels with the implementation of mitigation measures. Under long-term operations, because the RPA would involve fewer heavy trucks, operational vibration impacts would be reduced under the RPA in comparison to the Project, although impacts would be less than significant under both the Project and RPA.

N. Paleontological Resources

Under both the RPA and the proposed Project, a majority of the Project site would be subject to grading and development, with exception of the 27.1 acres located in the eastern portions of the site that would be conserved as open space under both the Project and the RPA. Thus, impacts to previously-undiscovered paleontological resources on site would be similar under the Project and the RPA, and would be reduced to less-than-significant levels with implementation of mitigation measures.



O. Population and Housing

The Project site does not contain any existing residences or housing, and neither the Project nor the RPA would displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. With respect to planned population growth, it is anticipated that a majority of the jobs that would be created by the Project and RPA would be filled by existing County residents and/or by future residents of areas already planned for development with residential uses. Thus, neither the Project nor the RPA would create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income, and the level of impact would be similar. Neither the RPA nor the Project would represent substantial unplanned population growth as the Project site is currently planned for urban land uses by the County's General Plan. Additionally, neither the Project nor the RPA would indirectly induce growth, as infrastructure improvements would be sized to accommodate only future development on site. Impacts to population and housing would be less than significant under both the Project and RPA, and the level of impact would be similar.

P. Public Services

The RPA would result in a reduced level of development intensity on site as the proposed Project. As such, impacts to fire services, sheriff services, and health services would be slightly reduced in comparison to the Project, although impacts under both the Project and RPA would be less than significant with payment of mandatory Development Impact Fees (DIF) in accordance with Riverside County Ordinance No. 659. Because neither the Project nor the RPA would involve residential development, impacts to recreation and schools would be less than significant with payment of DIF fees and payment of school impact fees pursuant to Riverside County Ordinance No. 575.

Q. Recreation

Neither the Project nor the RPA would involve residential development, and thus would not generate a direct demand for recreation resources. As such, with payment of DIF fees, impacts to recreation would be less than significant under both the Project and RPA, and the level of impact would be similar.

R. Transportation

Both the Project and the RPA would be conditioned to implement improvements and/or pay fair-share contributions to ensure that study area facilities achieve LOS D or better, in conformance with the applicable LOS standards of Riverside County and the City of Lake Elsinore; thus, impacts due to a conflict with a program, plan, ordinance, or policy addressing the circulation system would be less than significant under the Project and RPA, and the level of impact would be similar. Impacts due to hazardous geometric design features and incompatible uses would be less than significant under both the Project and the RPA, and the level of impact would be similar. Both the Project and the RPA would result in less-than-significant impacts due to the need for new or altered maintenance of roads. Both the Project and the RPA would have the potential to result in impacts to circulation during construction, including emergency access routes, although impacts would be reduced to less-than-significant levels with mitigation, and the level of impact after mitigation would be similar under the Project and RPA. Both the Project and RPA would be required to accommodate trails,



although impacts associated with the construction of such trails have been evaluated herein, and both the Project and RPA would result in similar less-than-significant impacts due to trail facilities. With respect to VMT, under the RPA the Project site would be developed with less light industrial and business park building area as compared to the Project, and thus would result in the generation of fewer jobs. Because the Project site is located in a portion of Riverside County that lacks employment opportunities, the RPA would result in increased impacts due to VMT. As with the Project, impacts due to VMT would be significant and unavoidable as mitigation is not available to reduce impacts to less-than-significant levels.

S. *Tribal Cultural Resources*

Grading activities under the Project and RPA would be the same. As such, potential impacts to tribal cultural resources would be the same under the RPA and proposed Project, and impacts would be less than significant with implementation of mitigation measures.

T. *Utilities and Service Systems*

Both the Project and RPA would require the construction of water, wastewater, storm water drainage, electric power, natural gas, and telecommunication facilities. Impacts associated with the provision of such facilities would be similar and would be mitigated to less-than-significant levels with implementation of mitigation measures. The EVMWD determined that it has sufficient water resources to accommodate development proposed as part of the Project, while the RPA would entail less light industrial and business park building area than the proposed Project. As such, the RPA would have a reduced demand for water as compared to the Project, and thus would result in reduced impacts to water supply as compared to the proposed Project. Similarly, because the EVMWD would have adequate capacity to treat wastewater generated by the Project, and because the amount of wastewater generated under the RPA would be reduced as compared to the Project, impacts due to wastewater treatment would be reduced under the RPA as compared to the proposed Project. Both the Project and RPA would be subject to the County's solid waste regulations, and neither the Project nor the RPA would result in the generation of solid waste that could adversely affect landfill capacity. Impacts associated with solid waste would be less than significant, although impacts would be reduced under the RPA due to the reduction in building intensity on site.

U. *Wildfire*

Both the Project and RPA would involve development of urban uses in adjacent to lands that are identified as having a high risk for wildfire hazards. Both the Project and RPA would be required to implement a FPP to ensure that adequate provisions are accommodated, such as fuel management zones, to reduce the risk of wildfires. With implementation of mitigation and a FPP, impacts due to wildfires would be reduced to less-than-significant levels and the level of impact would be similar.

V. *Conclusion*

As compared to the proposed Project, the RPA would result in increased impacts to VMT due to the reduction in employment opportunities accommodated on site as compared to the proposed Project. The RPA would result in the same or similar impacts as the proposed Project under the issue areas of agriculture and forestry



resources; biological resources; cultural resources; geology and soils; hydrology and water quality; mineral resources; paleontological resources; population and housing; recreation; tribal cultural resources; and wildfire. The RPA would result in reduced impacts under the issue areas of aesthetics; air quality; energy; greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise; public services; and utilities and service systems.

The RPA generally would meet the Project's objectives, although to a lesser extent than the proposed Project. While the RPA would result in the development of an underutilized property with a complementary mix of employment-generating land uses, including light industrial and business park land uses, due to the reduction in building area the RPA would not result in as efficient a development pattern as the proposed Project. Due to the reduced job opportunities on site under the RPA, the RPA would be less effective than the proposed Project in improving the region's jobs/housing balance. While the RPA would expand economic development, facilitate job creation, and increase the tax base for Riverside County, the RPA would be less effective in meeting this objective due to the reduction of building area and employment opportunities. The RPA would meet the Project's objective to establish development standards and design guidelines to ensure future development on site complements other existing and planned uses in the immediate vicinity and minimizes conflicts with other nearby land uses. The RPA also would meet the Project's objective to establish a unified thematic concept for future development through design elements such as architecture, monumentation, theme walls, and landscaping using a long-range comprehensive planning approach that cannot be accomplished on a parcel-by-parcel basis. Due to the reduction in building area and employment opportunities on site, the RPA would be less effective than the Project in providing a mixture of light industrial and business park land uses in a master-planned commerce center that would be marketable within the evolving economic profile of western Riverside County. The RPA would meet the Project's objective to develop a mix of light industrial and business park uses in unincorporated Riverside County that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar uses in the local area and region. The RPA also would meet the Project's objective to develop a property that has access to available infrastructure, including roads and utilities.



Table 6-2 Alternatives to the Proposed Project – Comparison of Environmental Impacts

Environmental Topic	Proposed Project Significance of Impacts After Mitigation	Level of Impact Compared to the Proposed Project/Compliance with Project Objectives		
		No Project/No Development Alternative (NDA)	No Project (Existing Specific Plan) Alternative (NPA)	Reduced Project Alternative (RPA)
Aesthetics	Less than Significant	Reduced	Similar	Reduced
Agriculture and Forestry Resources	Significant and Unavoidable Direct and Cumulatively-Considerable Impact	Reduced to Less-than-Significant Levels	Increased	Similar
Air Quality	Significant and Unavoidable Direct and Cumulatively-Considerable Impacts	Reduced to Less-than-Significant Levels	Reduced to Less-than-Significant Levels	Reduced but not to Less-than-Significant levels
Biological Resources	Less than Significant	Reduced	Similar	Similar
Cultural Resources	Less than Significant	Reduced	Similar	Similar
Energy	Less than Significant	Reduced	Construction: Similar Vehicular Operational Energy: Reduced Facility Operational Energy: Reduced	Reduced
Geology and Soils	Less than Significant	Reduced	Most Issues: Similar Seismic Hazards: Decreased	Similar
Greenhouse Gas Emissions	Significant and Unavoidable Cumulatively-Considerable Impact	Reduced to Less-than-Significant levels	Reduced but not to Less-than-Significant levels	Reduced but not to Less-than-Significant levels
Hazards and Hazardous Materials	Less than Significant	Most Issues: Reduced Contaminated Soils: Increased	Reduced	Reduced
Hydrology and Water Quality	Less than Significant	Most Issues: Reduced Erosion/Siltation: Increased	Similar	Similar
Land Use and Planning	Less than Significant	Increased	Reduced	Reduced
Mineral Resources	Less than Significant	Similar	Similar	Similar
Noise	Less than Significant	Reduced	Reduced	Reduced
Paleontological Resources	Less than Significant	Reduced	Similar	Similar
Population and Housing	Less than Significant	Reduced	Similar	Similar
Public Services	Less than Significant	Reduced	Police/Fire/Health: Similar Schools/Libraries/Recreation: Increased	Reduced
Recreation	Less than Significant	Similar	Increased	Similar
Transportation	Significant and Unavoidable Direct and Cumulatively-Considerable Impacts	Reduced to Less-than-Significant Levels	Reduced	Increased
Tribal Cultural Resources	Less than Significant	Reduced	Similar	Similar
Utilities and Service Systems	Less than Significant	Reduced	Similar	Reduced
Wildfire	Less-than-Significant	Mixed (No new buildings would be constructed on site, but the natural vegetation on site would be subject to wildland fire hazards)	Similar	Similar



Environmental Topic	Proposed Project Significance of Impacts After Mitigation	Level of Impact Compared to the Proposed Project/Compliance with Project Objectives		
		No Project/No Development Alternative (NDA)	No Project (Existing Specific Plan) Alternative (NPA)	Reduced Project Alternative (RPA)
Objective A: To efficiently develop an underutilized property with a complementary mix of employment-generating land uses, including light industrial and business park land uses.		No	No	Yes, but less efficiently
Objective B: To assist the SCAG region in achieving jobs/housing balance region-wide and in the local area by providing additional job opportunities in a housing rich area of the Inland Empire that will reduce the need for members of the local workforce to commute outside the area for employment.		No	No	Yes, but less effectively
Objective C: To expand economic development, facilitate job creation, and increase the tax base for Riverside County by accommodating and diversifying facilities needed to support the goods movement supply chain.		No	No	Yes, but less effectively
Objective D: To establish development standards and design guidelines to ensure future development on site complements other existing and planned uses in the immediate vicinity and minimizes conflicts with other nearby land uses.		No	Yes	Yes
Objective E: To establish a unified thematic concept for future development through design elements such as architecture, monumentation, theme walls, and landscaping using a long-range comprehensive planning approach that cannot be accomplished on a parcel-by-parcel basis.		No	Yes	Yes
Objective F: To anticipate market demand by providing a mixture of light industrial and business park land uses in a master-planned commerce center that would be marketable within the evolving economic profile of western Riverside County.		No	No	Yes, but less effectively
Objective G: To develop a mix of light industrial and business park uses in unincorporated Riverside County that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar uses in the local area and region.		No	No	Yes
Objective H: To develop a property that has access to available infrastructure, including roads and utilities.		No	Yes	Yes



7.0 REFERENCES

7.1 PERSONS CONTRIBUTING TO EIR PREPARATION

7.1.1 COUNTY OF RIVERSIDE PLANNING DIVISION

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7.1.2 T&B PLANNING, INC.

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Degrees: B.S. in Urban and Regional Planning

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Jerrica Harding, AICP, Senior Associate

Degrees: B.S. Natural Resources Planning; Masters of Urban and Regional Planning

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7.2 DOCUMENTS APPENDED TO THIS EIR

The following reports, studies, and supporting documentation were used in preparing the Renaissance Ranch EIR and are bound separately as Technical Appendices. A copy of the Technical Appendices is available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92502.

- Appendix A: Initial Study for the Renaissance Ranch EIR, Notice of Preparation (NOP), and Written Comments on the NOP.
- Appendix B: ECORP Consulting, Inc. (ECORP), 2021a. *Air Quality & Greenhouse Gas Assessment Renaissance Ranch Project*. March 2021.
- Appendix C1: Glenn Lukos Associates, Inc. (GLA), 2021a. *Biological Technical Report for Renaissance Ranch Development Project*. September 29, 2021.
- Appendix C2: GLA, 2021b. *Determination of Biologically Equivalent or Superior Preservation DBESP) Analysis for Impacts to MSHCP Riparian/Riverine Areas, Renaissance Ranch Development Project*. October 2021.
- Appendix D: Brian F. Smith and Associates (BFSA), 2021a. *A Phase I and II Cultural Resources Assessment for the Renaissance Ranch Project*. February 5, 2021.
- Appendix E: Urban Crossroads, Inc., 2021a. *Renaissance Ranch Specific Plan Energy Analysis*. March 26, 2021.



- Appendix F1: Petra Geosciences, Inc. (Petra), 2020. *Geotechnical Update Report, Proposed Industrial Park Development, Renaissance Ranch Project, Horsethief Canyon Area of Riverside County, California*. July 30, 2020.
- Appendix F2: GeoSoils, Inc., 2003a. *Geotechnical Feasibility Investigation, Tentative Tract Map No. 31210, ±134-Acre Parcel, Horsethief Canyon Area, Riverside County, California*. April 28, 2003.
- Appendix F3: GeoSoils, Inc., 2003b. *Geotechnical Feasibility Investigation, Tentative Tract Map No. 31485, ±23-Acres, Horsethief Canyon Area, Riverside County, California*. June 30, 2003.
- Appendix G1: Hillmann Consulting, 2019. *Phase I Environmental Site Assessment, Renaissance Ranch located north of Bucking Bay/Palomino Creek Corona, California 92883*. August 21, 2019.
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- Appendix H1: K&A Engineering, Inc. (K&A), 2022a. *Preliminary Drainage Report for Renaissance Ranch Commerce Center*. February 2022.
- Appendix H2: K&A, 2022b. *Preliminary Project Specific Water Quality Management Plan, Renaissance Ranch Commerce Center*. February 2022.
- Appendix I: T&B Planning, Inc., 2022a. *General Plan Consistency Analysis for Amendment No. 1 to the Renaissance Ranch Specific Plan No. 333*. February 28, 2022.
- Appendix J1: ECORP Consulting, Inc. (ECORP), 2021b. *Noise Impact Assessment Renaissance Ranch Project*. March 2021.
- Appendix J2: ECORP Consulting, Inc. (ECORP), 2022. *Renaissance Ranch Focused Traffic Route – Noise Technical Memorandum*. May 2022.
- Appendix K: Brian F. Smith and Associates (BFSA), 2021b. *Paleontological Resource Impact Monitoring Program for the Renaissance Ranch Project*. February 5, 2021.
- Appendix L1: Urban Crossroads, Inc., 2021b. *Renaissance Ranch Specific Plan (SP00333A01) Vehicle Miles Travelled (VMT) Analysis*. February 2, 2021.
- Appendix L2: Urban Crossroads, Inc., 2022a. *Renaissance Ranch Specific Plan (SP00333A01) Traffic Analysis*. March 1, 2022.



- Appendix L3: Urban Crossroads, 2021c. *Renaissance Ranch Specific Plan (SP00333A01) Focused Traffic Assessment*. March 30, 2021.
- Appendix L4: Urban Crossroads, Inc., 2022b. *Renaissance Ranch Focused Traffic Assessment*. May 16, 2022.
- Appendix M: Elsinore Valley Municipal Water District, 2021b. *Water Supply Assessment for Renaissance Ranch Commerce Center Specific Plan No. 333, Amendment No. 1*. September 7, 2021.
- Appendix N: Dudek, 2021. *Draft Fire Protection Plan Renaissance Ranch Commerce Center Specific Plan*. March 2021.
- Appendix O: T&B Planning, Inc., 2022b. *Renaissance Ranch Commerce Center Specific Plan No. 333, Amendment No. 1*. March 2022.

7.3 DOCUMENTS INCORPORATED BY REFERENCE

The following reports, studies, and supporting documentation were used in the preparation of this EIR and are incorporated by reference within this EIR. A copy of the following reports, studies, and supporting documentation is a matter of public record and is generally available to the public at the location listed. Documents not available on-line are available for public review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501.

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