COUNTY OF RIVERSIDE
ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY

Environmental Assessment (CEQ / EA) Number:
Project Case Type (s) and Number(s):
Lead Agency Name: County of Riverside Planning Department
Address: 4080 Lemon Street 12th Floor, Riverside, CA 92501
Contact Person: Brett Dawson, Project Planner
Telephone Number: 951-955-0972
Applicant's Name: Imagine Charter Holdings, LLC
Applicant's Address: 775 West 1200 North, Suite 100, Springville, UT, 84663

I. PROJECT INFORMATION

Project Description:

Regional Location:
The project site is located in western Riverside County, approximately 35 miles southeast of Riverside. The project site is located within Riverside County's San Jacinto Valley Area Plan. State Route (SR) 74 runs just north of the project site in an east-west direction along Florida Avenue, and connects with Interstate 215 (I-215) to the west. SR 79 connects the City with San Jacinto to the north, and Temecula and Interstate 15 (I-15) to the south. The project site is within the City of Hemet's Sphere of Influence but is otherwise surrounded by unincorporated areas of Riverside County to the south, east, and west. refer to **Exhibit 1**, *Regional Location*, and **Exhibit 2**, *Local Vicinity.*

Background:
The Imagine Public Charter School Hemet (IPCSH) Phase 1 project (2019/2020 school year) was permitted for 190 students. However, the 2019/2020 school year had an enrollment of only 149 students, with capacity for 41 additional students in agreement with original approval. The interim stage expanded its capacity to a total of 250 students, or 60 additional students from the original approval. The proposed Project anticipates the school's expansion and would require the addition of three modular buildings.

Project Description:
The project proposes three new prefabricated school modular buildings to be located on the southwest portion of the Imagine School – Hemet Campus site. Installation of the three modular buildings is anticipated to be completed in 2022/2023 (build-out). However, the project would reach student capacity in school year 2026/2027. At capacity during school year 2026/2027, IPCSH anticipates a total student enrollment of up to 900 students which would range from grades transitional kinder (TK) through 8th grade. Each school year, IPCSH will be adding an additional grade-level in a staggered manner, so it will be a few years before the school reaches the enrollment of 8th graders. For example, for school year 2021/2022, the school will only enroll up to 3rd graders (approximately 336 students), and the next school year 2022/2023, the school will only enroll up to 4th grade (approximately 432 students). Eighth graders are anticipated to be enrolled for school year 2026/2027 with 816 students; refer to **Table 1**, *Project Summary*, for a breakdown of the proposed structures, and **Table 2**, *Projected Enrollment and Pick-up Times.*

Table 1: Project Summary

Building/Area	Proposed Actions	Height (Feet)	Area (SF)	Classrooms
Building A *(Existing)*	Construct additional classrooms		-	4
Building B *(Existing)*	None		-	-
Building C *(Proposed)*	Install a 105' X 72' modular building.	14'	7,520	8
Building D *(Proposed)*	Install a 105' X 72' modular building.	14'	7,520	8
Building E *(Proposed)*	Install a 47' X 72' modular building.	14'	2,736	4
		Total Project Area	**17,776**	**24**

Additionally, the project would include the disturbance/demolition of existing hardscape and landscape areas and the demolition of limited hardscape features needed to be removed to accommodate the new prefabricated modular buildings. The proposed modular buildings would be located within the two open grass areas located on the southwest portion of the site. Moreover, to accommodate the prefabricated buildings, 15 existing parking spaces along with adjacent curb and sidewalk would be demolished and replaced with a concrete walkway and landscaping. The project would disturb a 0.68-acre area of the total 12.19 acres school site; refer to **Exhibit 3**, *Site Plan*.

Table 2: Projected Enrollment and Pick-Up Times

Grade Level	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	Pick-Up Times
TK	24	24	24	24	24	24	2:40 pm to 2:50 pm
Kinder	96	96	96	96	96	96	
1st	96	96	96	96	96	96	2:50 pm to 3:00 pm
2nd	72	72	96	96	96	96	
3rd	48	72	96	96	96	96	3:00 pm to 3:10 pm
4th	-	48	72	96	96	96	
5th	-		48	72	96	96	
6th	-	-	-	48	72	96	3:10 pm to 3:20 pm
7th	-	-	-	-	48	72	
8th	-	-	-	-	-	48	
Total Enrollment	**336**	**432**	**528**	**624**	**720**	816	-

Site Access and Circulation:

- Existing Driveway #1 is an approximately 60-foot-wide driveway on Florida Avenue/Hwy-74, located approximately 610 feet east of the intersection of Soboba Avenue. Driveway #1 is the main ingress/entrance during drop-off and pick-up periods.

- Driveway #2 is located on Soboba Street, approximately 295 feet south of Florida Avenue/Hwy-74 and approximately 485 feet north of Buenos Aires Drive. Driveway #2 is the main egress/exit during drop-off and pick-up periods.

Once onsite, vehicles would circulate in either clockwise or counterclockwise direction around the campus depending. As noted above, Driveway #1 would be the main entrance and Driveway #2 would be the main exit during both drop-off and pick-up times.

Additionally, the projected bus riders are shown below in **Table 3**, *Projected Bus Riders per School Year*

Table 3: Projected Bus Riders per School Year

School Year	TK	1st	2nd	3rd	4th	5th	6th	7th	8th	Total Enrollment
2020/21	70									227
2021/22	105									336
2022/23	135									432
2023/24	165									528
2024/25	185									624
2025/26	205									720
2026/27	225									816

Pedestrian Access
The project frontage provides fully developed pedestrian facilities. Main pedestrian access is provided via both driveways. Crossing guards will improve pedestrian access and safety for students and residents alike.

Lighting
The project site is located in Zone B of the San Jacinto Valley Area Plan, as shown in the Mt. Palomar Nighttime Lighting Policy Area, Figure 6. According to the County, most of the City of Hemet and a great portion of the County of Riverside is subject to Ordinance No. 655. The project would continue to adhere to the County's lighting requirements by including adequate indoor and outdoor lighting. Illumination would be provided for safe access, security, sports activities. Exterior lighting will include wall-mounted fixtures on buildings.

Demolition and Construction
As shown on **Exhibit 2**, *Site Plan*, to accommodate the proposed modular buildings, 15 existing parking spaces, grassy areas, concrete from sidewalks, and asphalt from parking area would be demolished.

Construction includes the laying of concrete foundations, concrete entries for all three buildings, concrete walkway, and the installation of the three proposed modular buildings. As noted in Table 1, the modular buildings would occupy 17,776 SF. Project construction is anticipated to occur in one phase and commence spring of 2021 and would continue for approximately 24 months. The project site has been previously fully graded. as such, minimum grading is anticipated.

Construction equipment would include excavators, backhoes, forklifts, compactors, concrete mixers and pumps, scrapers, cranes, and electric lifts. The project does not include the construction of any new roads in the project area.

Pursuant to Section 7.25.010 of the County Municipal Code, construction noise levels are prohibited between the hours of 8:00 PM and 7:00 AM. Additionally, Section 8.54.020: Prohibited Acts, prohibits the operation or use of loud construction equipment between the hours of 10:00 PM and 8:00 AM, except with the prior approval of the County. The project would abide by the County's Municipal Code Section 7.25.010 and Section 8.54.020.

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

B. Total Project Area:
As noted above, the proposed project would disturb 0.68-acres of the total 12.19-acre IPCSH campus.

Residential Acres:	**Lots:**	**Units:**	**Projected No. of Residents:**
Commercial Acres:	**Lots:**	**Sq. Ft. of Bldg. Area:**	**Est. No. of Employees:**
Industrial Acres:	**Lots:**	**Sq. Ft. of Bldg. Area:**	**Est. No. of Employees:**
Other: 12.19-acresite			

C. Assessor's Parcel No(s): 551-220-069

Street References: 42655 Florida Avenue, Hemet, CA 92544. Southeast Corner of Florida Avenue (Highway 74) and Soboba Street; refer to **Exhibit 2**, *Local Vicinity.*

D. Section, Township & Range Description or reference/attach a Legal Description: T5S R1E

E. Brief description of the existing environmental setting of the project site and its surroundings:
The Project site is developed with two existing buildings, formerly used for church operations. The buildings, A and B, have been repurposed to serve as a school facility. The site contains ornamental landscaping throughout. The project site includes two infiltration basins for stormwater mitigation

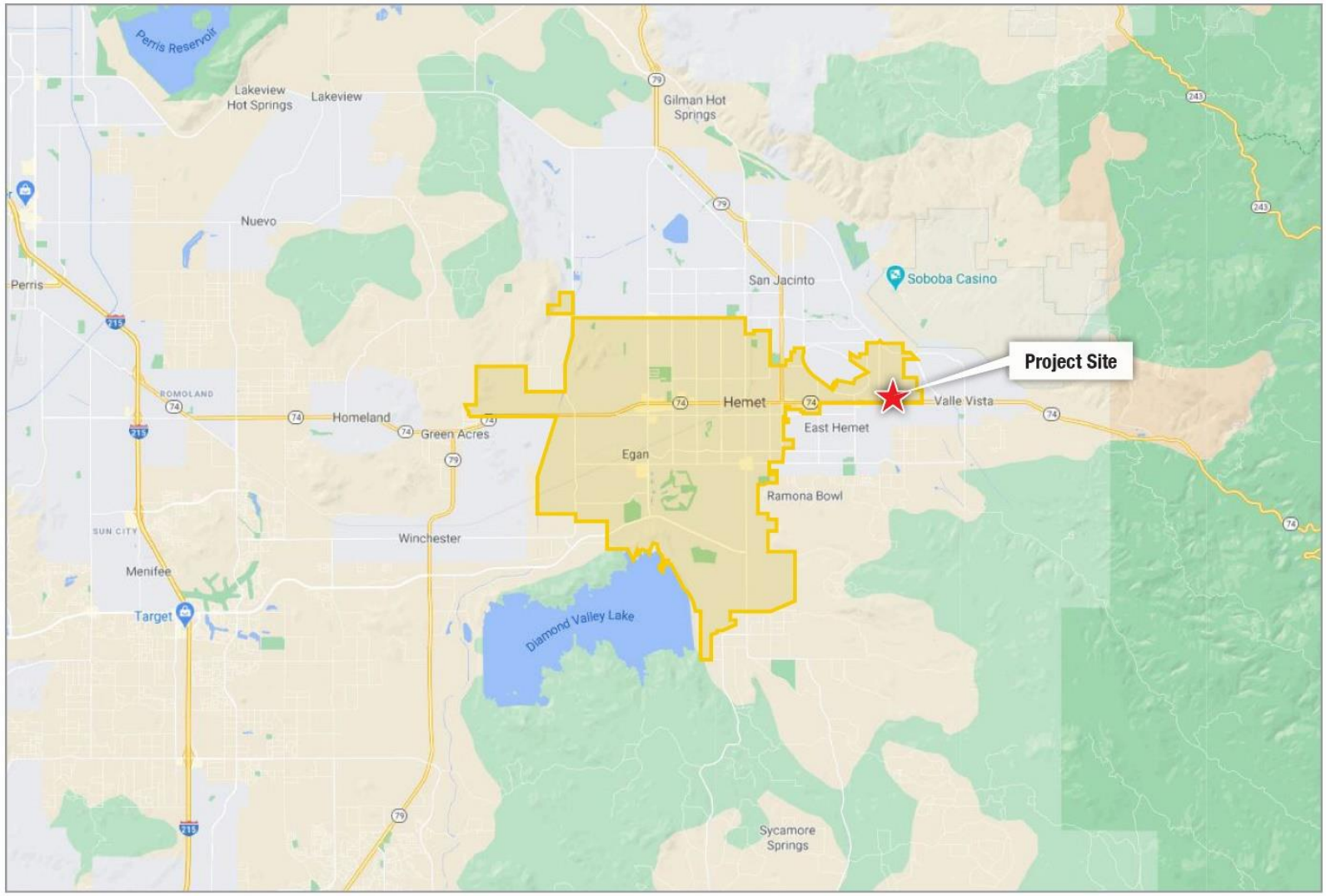
and treatment. One infiltration basin is located along the northern project boundary and the second infiltration area is just north of the existing dirt softball field, located along the eastern project site's boundary. The project site is traversed by the San Jacinto fault which runs across the existing parking area in a north-south direction.[1] The project site is designated as being in a moderate liquefaction zone, it and is susceptible to subsidence.[2] Vehicle parking is provided in the center of the site, and a driving aisle that allows for movement throughout the site providing connectivity from the driveway on Highway 74 (Driveway 1) to the Soboba Street (Driveway 2).

Existing Utilities:
The existing structures are fully functional, and utilities are provided by the following utility providers:

- Sewer Service: Eastern Municipal Water District (EMWD)
- Gas Service: Southern California Gas Company (SoCalGas)
- Phone Service: Jive Communications
- Water Service: Lake Hemet Municipal Water District (LHMWD)
- Electrical Service: Southern California Edison (SCE)

No additional utilities would be required as part of the proposed project.

[1] Department of Conservation (DOC). 2019. *Fault Activity Map of California*. Available at https://maps.conservation.ca.gov/cgs/fam/, accessed on January 20, 2020.
[2] Riverside County. 2020. Riverside County Parcel Report, APN: 551220069. (See Appendix A)

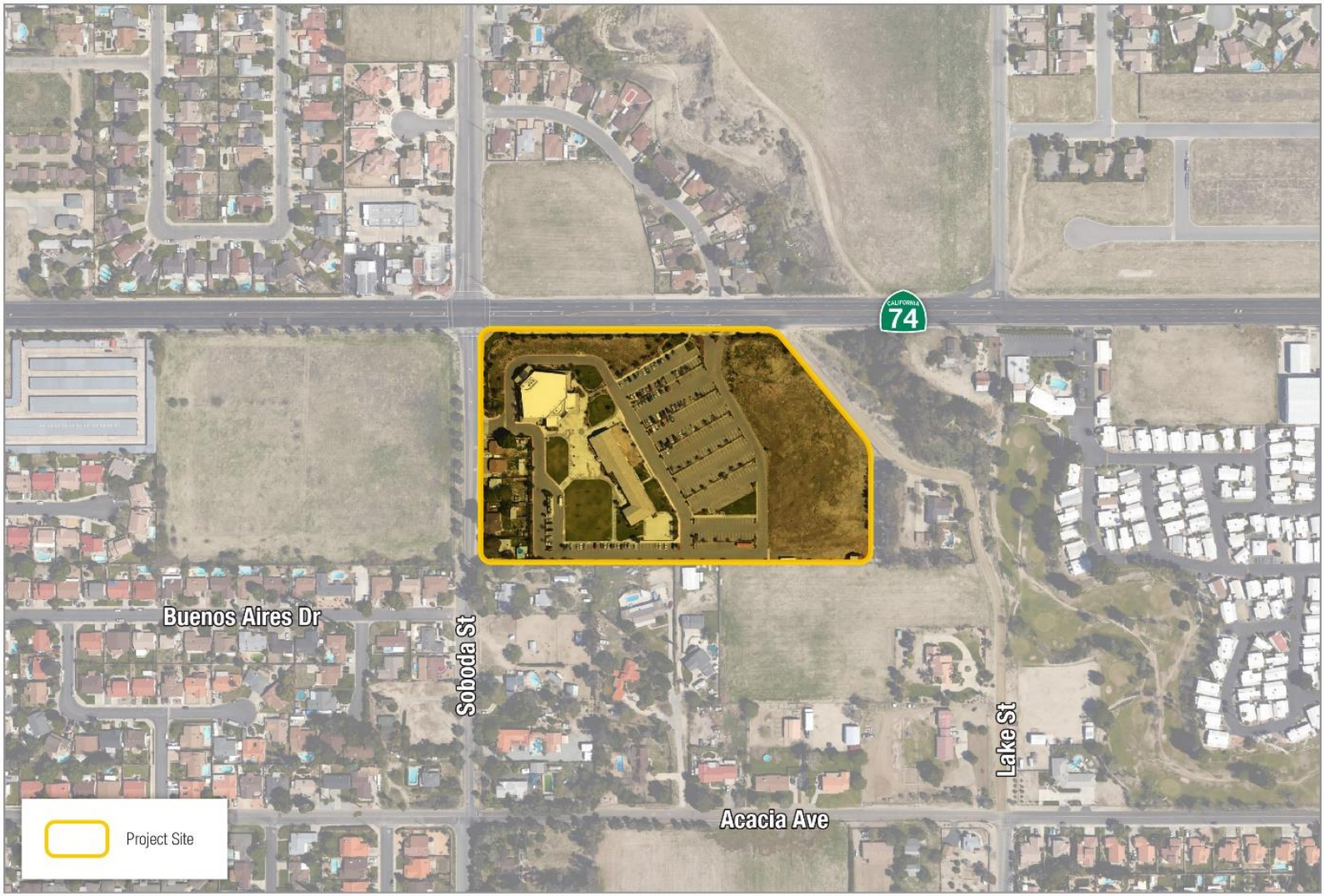


Source: Google Maps

EXHIBIT 1: Regional Location
Hemet Imagine
City of Hemet

Not to scale

Kimley»Horn



Source: Google Earth

EXHIBIT 2: Local Vicinity
Hemet Imagine
City of Hemet

Not to scale

Kimley»Horn

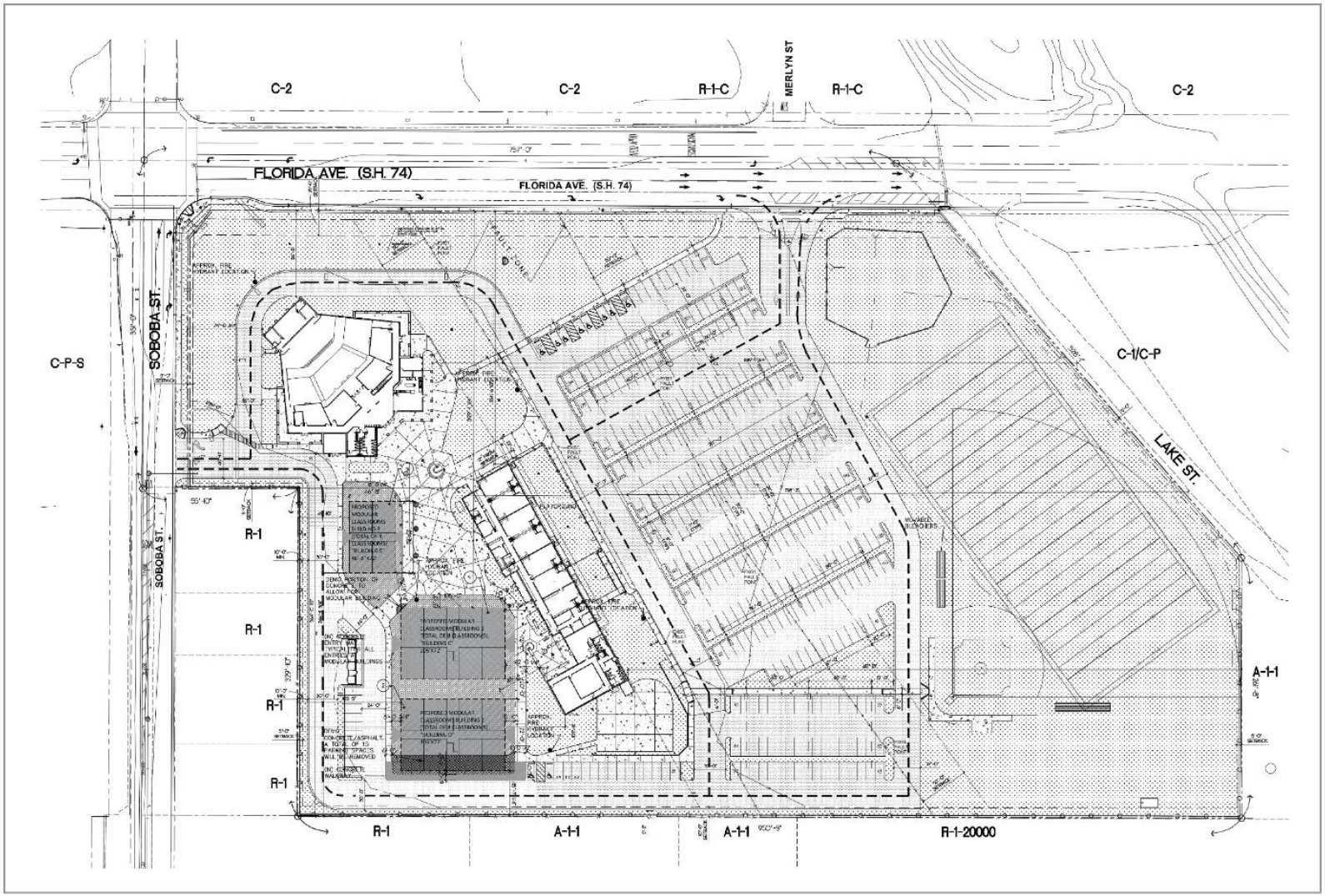


EXHIBIT 3: Site Plan
Hemet Imagine
City of Hemet

Not to scale

Kimley»Horn

II. APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

A. General Plan Elements/Policies: MDR (Medium Density Residual) and MHDR (Medium High Density Residential)

1. Land Use:

The project site is located in the San Jacinto Valley Area Plan of the RCIP. The following **Table 4**, *Existing General Plan Land Use and Zoning Designations* demonstrate both existing Land Uses and Zoning Designations.

Table 4: Existing General Plan Land Use and Zoning Designations

Location	Existing Use	Existing General Plan Land Use Designation	Existing Zoning Designation
Project Site	Imagine Charter School Hemet	Commercial Retail (CR)	C-P-S (scenic highway commercial)
North	Single-Family Residential, Vacant Land	City of Hemet	City of Hemet
South	Single-Family Residential, Vacant Land	Medium Density Residential (2 – 5.0 du/ac)	R-1 (One-Family Dwelling Zone)
East	Single-Family Residential, Vacant Land	Community Retail (CR) and Very High Density Residential	R-T. C-P-S (scenic highway commercial)
West	Single-Family Residential, Vacant Land	Community Retail (CR) Medium Density Residential (2 – 5.0 du/ac)	C-P-S (scenic highway commercial) R-1 (One-Family Dwelling Zone)

Source: County of Riverside. (2015). *San Jacinto Valley Area Plan*. Available at https://planning.rctlma.org/General-Plan-Zoning/General-Plan. Accessed on February 11, 2020.

2. Circulation: Not in a Circulation Element Right-of-way

3. Multipurpose Open Space: The Project avoids natural watercourses, and flood plains, and is not part of a cell group.

4. Safety: The Project site is not located in a fire hazard zone nor in a fire responsibility area.

5. Noise: N/A

6. Housing: N/A

7. Air Quality: N/A

8. Healthy Communities: N/A

9. Environmental Justice (After Element is Adopted): N/A

B. General Plan Area Plan(s): Florida Avenue Corridor Policy Area.

C. Foundation Component(s): N/A

D. Land Use Designation(s): Commercial Retail (CR)

E. Overlay(s), if any: Not located in a zoning overlay

F. Policy Area(s), if any: Florida Avenue Corridor Policy Area

G. Adjacent and Surrounding:

1. **General Plan Area Plan(s):** San Jacinto Valley Area Plan
2. **Foundation Component(s):** N/A
3. **Land Use Designation(s):** Commercial Retail (CR)
4. **Overlay(s), if any:** Not in an overlay or policy area
5. **Policy Area(s), if any:** N/A

H. Adopted Specific Plan Information

1. **Name and Number of Specific Plan, if any:** Not in specific plan area
2. **Specific Plan Planning Area, and Policies, if any:** Not applicable

I. Existing Zoning: C-P-S (scenic highway commercial)

J. Proposed Zoning, if any: N/A

K. Adjacent and Surrounding Zoning: Refer to Table 4, above.

III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

☐ Aesthetics	☐ Hazards & Hazardous Materials	☐ Recreation
☐ Agriculture & Forest Resources	☐ Hydrology / Water Quality	☐ Transportation
☐ Air Quality	☐ Land Use / Planning	☐ Tribal Cultural Resources
☐ Biological Resources	☐ Mineral Resources	☐ Utilities / Service Systems
☐ Cultural Resources	☒ Noise	☐ Wildfire
☐ Energy	☒ Paleontological Resources	☐ Mandatory Findings of Significance
☐ Geology / Soils	☐ Population / Housing	
☐ Greenhouse Gas Emissions	☐ Public Services	

IV. DETERMINATION

On the basis of this initial evaluation:

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED
☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project, described in this document, have been made or agreed to by the project proponent. **A MITIGATED NEGATIVE DECLARATION** will be prepared.
☐ I find that the proposed project MAY have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS PREPARED
☐ I find that although the proposed project could have a significant effect on the environment, **NO NEW ENVIRONMENTAL DOCUMENTATION IS REQUIRED** because (a) all potentially significant effects of the proposed project have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, (b) all potentially significant effects of the proposed project have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, (c) the proposed project will not result in any new significant environmental effects not identified in the earlier EIR or Negative Declaration, (d) the proposed project will not substantially increase the severity of the environmental effects identified in the earlier EIR or Negative Declaration, (e) no considerably different mitigation measures have been identified and (f) no mitigation measures found infeasible have become feasible.
☐ I find that although all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, some changes or additions are necessary but none of the conditions described in California Code of Regulations, Section 15162 exist. An **ADDENDUM** to a previously-certified EIR or Negative Declaration has been prepared and will be considered by the approving body or bodies.
☐ I find that at least one of the conditions described in California Code of Regulations, Section 15162 exist, but I further find that only minor additions or changes are necessary to make the previous EIR adequately apply to the project in the changed situation; therefore a **SUPPLEMENT TO THE ENVIRONMENTAL IMPACT REPORT** is required that need only contain the information necessary to make the previous EIR adequate for the project as revised.
☐ I find that at least one of the following conditions described in California Code of Regulations, Section 15162, exist and **a SUBSEQUENT ENVIRONMENTAL IMPACT REPORT** is required: (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; (2) Substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any the following:(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration;(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or,(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects of the project on the environment, but the project proponents decline to adopt the mitigation measures or alternatives.

Signature

4/5/22
Date

BRAD DAWSON
Printed Name

For: John Hildebrand, *Planning Director*

V. ENVIRONMENTAL ISSUES ASSESSMENT

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

AESTHETICS Would the project:

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

Regional Context

The project is located in Riverside County within the City of Hemet's southern Sphere of Influence. This regional area is described as the San Jacinto Valley Area and is surrounded by the City of Hemet to the north, the San Jacinto Mountains and the San Jacinto River to the east, unincorporated Riverside County and Little Lake to the south, Riverside County to the west, and Diamond Valley Lake to the southwest. Regional access to the project site is available via I-215 at Highway 74.

Project Site Vicinity

The project site is bounded by residential single-family homes on all four fronts, single-family residential and vacant lots to the north and south, the Arroyo Fairways Mobile Home Club to the east, a single-family residential and vacant lots to the west.

Scenic Vistas

Under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly-valued landscape for the benefit of the general public. The San Jacinto Valley Area Plan identifies that the ridgelines of the San Jacinto Mountains and the San Jacinto River are considered a designated scenic resource since these provide a significant visual resource for the plan area. Additionally, State Route 74 (SR 74) (Florida Avenue) is considered a State Eligible Scenic Highway.

1.	**Scenic Resources**				
a)	Have a substantial effect upon a scenic highway corridor within which it is located?	☐	☐	☒	☐

Less Than Significant Impact. As previously noted in the project description, the associated project improvements would take place within the footprint of the school campus.

Based on both aerial and photographic imagery, the most prominent natural feature visible from the Project site is the San Jacinto Mountain Range to the east. The San Jacinto Mountain stands approximately 10,834 feet above sea level (ASL) and is the second highest mountain range in Southern California.

The project site is located approximately 5.0 miles from the base of the San Jacinto Mountains and due to the altitude of the mountain range, the existing project site buildings, nor the proposed single story modular buildings would hinder views of the mountains of the residents located adjacent to the west and south of the project site. The one-story modular buildings would be located on the southwest corner of the site and are approximately 12 feet high. The modular buildings would be set back approximately 50 feet from the single-family dwelling units located just south and west. Additionally, the project site is located just south of Highway (HWY) 74. HWY 74 is a State Eligible (E) scenic highway from approximately the border of the San Bernardino National Forest to HWY 111 in Palm Desert. A portion of HWY 74 is Officially Designated (OD) as a State

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Scenic Highway, but the portion that is OD is not near the project site. The OD portion of HWY 74 begins approximately 5.0-miles east of the project site. No portion of HWY 74 would be affected from project implementation. Moreover, the proposed buildings would be of similar or less height than the existing buildings in the Project site.

The proposed buildings would not conflict with Riverside County's Development Code Chapter 17.80 which prohibits building heights in excess of 50 feet. For these reasons, it is anticipated that the Project would not cause a substantial adverse effect to the surrounding land uses by affecting views of a scenic vista. Implementation of the Project would cause a less than significant impact on a scenic vista.

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?	☐	☐	☐	☒

No Impact. As noted above in Response 1a, Scenic Resources, no scenic resources occur onsite. The project site is located a portion of HWY 74 which has been deemed as Eligible; however, it is not located near the OD portion of HWY 74. Additionally, as noted in the project description, the site is fully developed no trees, rock outcroppings, or unique landmark features occur onsite. Additionally, the proposed modular buildings would not obstruct the views of the San Jacinto Mounts. The proposed development is consistent with the existing building and surrounding infrastructure. The project does not propose an offensive project development in any manner. Therefore, no impact would occur.

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?	☐	☐	☐	☒

No impact. The project site is fully developed and has been previously graded. The project area where disturbance would occur for the implementation of the three modular buildings is currently ornamental grass and passenger vehicle parking. This portion of the project site is shielded from public views. Once the three modular buildings are in place, they would continue to be shielded from public views by the adjacent residential dwelling units and privacy walls. The development and building expansion of the proposed project would not degrade the existing visual character or quality of public views and/or its surroundings. The addition of the modular buildings is consistent with the current use of the site and, as such, the project would not conflict with the applicable zoning and/ or other regulations governing scenic quality. No impact would occur.

Short-term Construction Visual Impacts

Short-term construction impacts include light construction equipment and machinery (demolition of concrete) and staging of the machinery. No valuable aesthetic resources would be destroyed as a result of construction-related activities because the portion of site is currently undeveloped, and only includes ornamental landscaping and vehicle parking. Construction impacts are temporary and would cease upon project completion.

Long-term Visual Impacts

The proposed project's permanent building structures and associated amenities would be built generally using colors, materials, and textures consistent with the existing buildings. No long-term visual impacts are

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

anticipated from the implementation of the project. The public views of the site would remain consistent to the existing development. Therefore, the project would have a less than significant impact on the visual character of the site and its surroundings.

Source(s): Riverside County General Plan Figure C-8 "Scenic Highways," San Jacinto Valley Plan. https://planning.rctlma.org/Portals/14/genplan/general_Plan_2017/areaplans/SJVAP_120616.pdf?ver=2017-10-06-094252-663. Accessed October 1, 2020.

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

2. Mt. Palomar Observatory a) Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?	☐	☐	☒	☐

Less than Significant Impact. No aspect of the proposed Project would conflict with Ordinance No. 655 regulating light pollution. The project would only introduce security lighting typically used on the exterior of modular buildings which is low light emitting and downward facing, consistent with Ordinance No. 655. Main nighttime lighting sources would continue compliance with Ordinance No. 655 which would reduce lighting impacts to less than significant levels. A less than significant impact would occur.

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

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

3. Other Lighting Issues a) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

No Impact. As previously noted above, in Response (2a), Mt. Palomar Observatory modular buildings would include additional security lights than those already being utilized on-site. The security lighting will continue to be in compliance with Ordinance No. 655 as it will implement security lights typical of modular buildings which are usually down facing fixtures. No other lighting would be required as part of the project implementation. Additionally, the be project would be consistent with Riverside County Development Code Chapter 8.80, Outdoor Lighting, which requiring outdoor luminaires to be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way. In regard to daytime glare, outdoor luminaires shall not blink, flash, or rotate. Compliance with Chapter 8.80 would ensure the reduction of light trespasses to protect the health, property, and well-being of residents around the project area. Security lighting shall also be provided at all entrances/exits.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Night lighting would see a negligible increase in nighttime light from the installation of security lighting of the three modular buildings. Similarly, daytime glare would not increase, because the modular buildings would not use reflective materials. The proposed project would comply with the County's Municipal Code and latest California Building Standard Code; thus, compliance with the County's Municipal Code relative to lighting and glare, would reduce impacts to a less than significant impact.

Any lighting plans, if available, would be reviewed by the County to ensure conformance with the latest California Green Building Standard Code (Part 11 of Title 24, CCR) such that only the minimum amount of lighting is used, and no light spillage occurs. As such, a less than significant impact would occur.

b)	Expose residential property to unacceptable light levels?	☐	☐	☐	☒

No impact. As noted in Responses (2a and 3a) of this Aesthetics Section, the proposed project would not introduce any unacceptable light sources to the site. The modular buildings would include the typical outdoor light fixtures utilized to provide lighting near doors which would be in compliance with Ordinance No. 655; No additional lighting sources would be introduced as part of the project. As such, the residential properties located approximately 50 feet west and approximately 100 feet south of the project would not be exposed to unacceptable light levels. No impact would occur.

Source(s): On-site Inspection, Project Application Description

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

AGRICULTURE & FOREST RESOURCES Would the project:

4.	**Agriculture**				
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
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?				

No Impact. The project site is not used for any type of agricultural activities and it is not located within 300 feet of an agriculturally zoned property. According to the California Department of Conservation Important Farmland Map, the project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The project site is designated as Urban and Built-Up Land.[3] The Project site is not

[3] DOC. 2019. *California Important Farmland Finder.* Available at. https://maps.conservation.ca.gov/dlrp/ciff/, accessed on March 11, 2020.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

subject to a Williamson Act contract.[4] No additional changes would occur from project implementation that would trigger or result in the rezoning of forest land, or timberland. The Project site does not meet the definition of forestland or timberland, as defined by PRC Sections 12220(g), 4526, and 51104(g). The Project would not involve changes in the existing environment and would not result in conversion of farmland to nonagricultural use. No impact would occur.

Source(s): Riverside County General Plan Figure OS-2 "Agricultural Resources," GIS database; Project Application Materials; DOC. 2019. *California Important Farmland Finder.* Available at. https://maps.conservation.ca.gov/dlrp/ciff/, accessed on October 4, 2020; DOC. 2019. *California Important Farmland Finder – Williamson Act Map.* Available at. https://maps.conservation.ca.gov/dlrp/ciff/, accessed on October 4, 2020.

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

No impact. As noted above in Response 4(a-d), no portion of the project site is used for agricultural purposes and does not provide forest resources or timberland. The Project site does not meet the definition of forestland or timberland, as defined by PRC Sections 12220(g), 4526, and 51104(g). The entire project site is fully developed. The proposed project would not conflict with existing zoning or cause rezoning of forest land. No impact to forest land would occur.

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

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

[4] DOC. 2019. *California Important Farmland Finder – Williamson Act Map.* Available at. https://maps.conservation.ca.gov/dlrp/ciff/, accessed on March 11, 2020.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AIR QUALITY Would the project:				
An Air Quality and a Greenhouse Gas Assessment (November 2020) have been prepared by Kimley-Horn and Associates. The reports are available as Appendix A to this IS/MND and are used to answer the following CEQA Thresholds.				
6. Air Quality Impacts **a)** Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

Less than Significant. As part of its enforcement responsibilities, the EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan that demonstrates the means to attain the federal standards. The State Implementation Plan 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 California Clean Air Act requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the state and federal ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project is located within the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (South Coast AQMD. The South Coast AQMD is required, pursuant to the FCAA, to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. To reduce such emissions, the South Coast AQMD drafted the 2016 Air Quality Management Plan (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 South Coast AQMD, the California Air Resources Board (CARB), the Southern California Association of Governments (SCAG), and the EPA. The plan's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's 2016 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 South Coast AQMD's AQMP.

Criteria for determining consistency with the AQMP are defined by the following indicators:

Consistency Criterion No. 1: The Project will not 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.

Consistency Criterion No. 2: The Project will not exceed the assumptions in the AQMP or increments based on the years of the Project build-out phase.

According to the South Coast AQMD's CEQA Air Quality Handbook, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus if it would interfere with the region's ability to comply with California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS).

The violations to which Consistency Criterion No. 1 refers are CAAQS and NAAQS. The Project would not exceed South Coast AQMD construction or operational emission standards. Therefore, the Project would not contribute to existing air quality violations. Thus, the Project is consistent with the first criterion.

Concerning Consistency Criterion No. 2, 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. The Project site is in an area of Riverside County

designated as the San Jacinto Valley Area Plan. Although the site is used as a school, the General Plan Land Use designated for the site is Commercial Retail (CR). Although the current use is not consistent with the General Plan, the use of the property as a school would not exceed the population or job growth projections used by South Coast AQMD to develop the AQMP. Thus, no impact would occur, as the Project is consistent with the second criterion.

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?	☐	☐	☒	☐

Construction Emissions

Construction associated with the Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project area include O_3-precursor pollutants (i.e., ROG and NO_X) and PM_{10} and $PM_{2.5}$. 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 South Coast AQMD's thresholds of significance.

Construction results in the temporary generation of emissions resulting from site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities as well as weather conditions and the appropriate application of water.

Construction-generated emissions associated the 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. See Appendix A: Air Quality Modeling Data of the AQ Assessment for more information regarding the construction assumptions used in this analysis. Predicted maximum daily construction-generated emissions for the Project are summarized in **Table 5**: *Construction-Related Emissions*.

Table 5: Construction-Related Emissions (Maximum Pounds Per Day)

Construction Year	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO_2)	Fine Particulate Matter (PM_{10})	Coarse Particulate Matter ($PM_{2.5}$)
Year 1 (2022)	8.78	7.49	7.90	0.02	0.77	0.51
South Coast AQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceed South Coast AQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Notes: South Coast AQMD Rule 403 Fugitive Dust applied. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; water exposed surfaces three times daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the South Coast AQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment. Refer to Appendix A for Model Data Outputs.						
Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.						

Fugitive dust emissions may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the Project vicinity. Uncontrolled dust from construction can become a nuisance and potential health hazard to those living and working nearby. South Coast AQMD Rules 402 and 403 (prohibition of nuisances, watering of inactive and perimeter areas, track out requirements, etc.), are applicable to the Project and were applied in CalEEMod to minimize fugitive dust

emissions. Standard Condition (SC) AQ-1 requires the implementation of Rule 402 and 403 dust control techniques to minimize PM_{10} and $PM_{2.5}$ concentrations. While impacts would be considered less than significant, the Project would be subject to South Coast AQMD Rules for reducing fugitive dust, described in the Regulatory Framework subsection above and identified in Standard Conditions SC AQ-1.

Operational Emissions

Project-generated emissions would be primarily associated with motor vehicle use, dropping off and picking up students. Long-term operational emissions attributable to the Project are summarized in **Table 6**: *Unmitigated Operational Emissions*. As shown in **Table 6**, the Project emissions would not exceed South Coast AQMD thresholds.

Table 6: Unmitigated Operational Emissions (Maximum Pounds Per Day)

Source	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO_2)	Fine Particulate Matter (PM_{10})	Coarse Particulate Matter ($PM_{2.5}$)
Area Source Emissions	0.38	<0.01	<0.01	0.00	<0.01	<0.01
Energy Emissions	<0.01	0.03	0.03	<0.01	<0.01	<0.01
Mobile Emissions	3.19	11.81	40.11	0.16	16.08	4.40
Total Emissions	**3.57**	**11.84**	**40.14**	**0.16**	**16.08**	**4.40**
South Coast AQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.

As noted above, the Project's operational emissions would be associated with area sources, energy sources, and mobile sources (i.e., motor vehicle use). Each of these sources are described below.

- **Area Source Emissions.** Area source emissions would be generated due to on-site equipment, architectural coating, and landscaping that were previously not present on the site.
- **Energy Source Emissions.** Energy source emissions would be generated due to electricity and natural gas usage associated with the Project. Primary uses of electricity and natural gas by the Project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics.
- **Mobile Source.** Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern. NO_X and ROG react with sunlight to form O_3, known as photochemical smog. Additionally, wind currents readily transport PM_{10} and $PM_{2.5}$. However, CO tends to be a localized pollutant, dispersing rapidly at the source. Project-generated vehicle emissions have been estimated using the applicable Institute of Transportation Engineers trip generation rate within CalEEMod as recommended by the South Coast AQMD and EMFAC 2017 emission rates with safe rule. Trip generation rates associated with the Project were based on Institute of Transportation Engineers (ITE) rates for Charter Elementary School (ITE Code 537).

Cumulative Short-Term Emissions

The SCAB is designated nonattainment for O_3, PM_{10}, and $PM_{2.5}$ for State standards and nonattainment for O_3 and $PM_{2.5}$ for Federal standards. Appendix D of the South Coast AQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003) notes that projects that result in emissions that do not exceed the project-specific South Coast AQMD regional thresholds of significance should result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary. Therefore, if a project is estimated to result in emissions that do not exceed the

thresholds, the project's contribution to the cumulative impact on air quality in the SCAB would not be cumulatively considerable. As shown in **Table 5** above, Project construction-related emissions by themselves would not exceed the South Coast AQMD significance thresholds for criteria pollutants. Therefore, the proposed Project would not generate a cumulatively considerable contribution to air pollutant emissions during construction.

The South Coast AQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the FCAA mandates. The analysis assumed fugitive dust controls (SC AQ-1) would be utilized during construction, including frequent water applications. South Coast AQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout the SCAB, which would include related projects. Compliance with South Coast AQMD rules and regulations would further reduce the Project construction-related impacts. Therefore, Project-related construction emissions, combined with those from other projects in the area, would not substantially deteriorate local air quality. Construction emissions associated with the Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Cumulative Long-Term Emissions

The South Coast AQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. The South Coast AQMD developed the operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to the SCAB's existing air quality conditions. Therefore, a project that exceeds the South Coast AQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact.

The Project operational emissions would not exceed the South Coast AQMD thresholds. Therefore, operation emissions associated with the Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Standard Conditions and Requirements:

SC AQ-1 Prior to the issuance of grading permits, the City Engineer shall confirm that the Grading Plan, Building Plans and Specifications require all construction contractors to comply with South Coast Air Quality Management District's (South Coast AQMD's) Rules 402 and 403 to minimize construction emissions of dust and particulates. The measures include, but are not limited to, the following:

- Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
- All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.
- All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
- Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the workday to remove soil tracked onto the paved surface.

Mitigation Measures: No mitigation is required.

Level of Significance: Less than significant impact.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?	☐	☐	☒	☐

Less than significant impact. The nearest sensitive receptor is a residential community located 550 feet (167 meters) to the north of the Project. To identify impacts to sensitive receptors, the South Coast AQMD recommends addressing LSTs for construction. LSTs were developed in response to South Coast AQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The South Coast AQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with Project-specific emissions.

Since CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment, **Table 7***: Equipment-Specific Grading Rates*, is used to determine the maximum daily disturbed acreage for comparison to LSTs. The appropriate SRA for the localized significance thresholds in the Hemet/San Jacinto Valley area (SRA 28) since this area includes the Project. LSTs apply to CO, NO_X, PM_{10}, and $PM_{2.5}$. The South Coast AQMD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size. Project construction is anticipated to disturb a maximum of 1.5 acres in a single day. As the LST guidance provides thresholds for projects disturbing 1-, 2-, and 5-acres in size and the thresholds increase with size of the site, the LSTs for a 1.5-acre threshold were interpolated and utilized for this analysis.

Table 7: Equipment-Specific Grading Rates

Construction Phase	Equipment Type	Equipment Quantity	Acres Graded per 8-Hour Day	Operating Hours per Day	Acres Graded per Day
Grading	Tractors	2	0.5	8	1.0
	Graders	0	0.5	8	0.0
	Dozers	1	0.5	8	0.5
	Scrapers	0	1	8	0.0
				Total Acres Graded per Day	**1.5**

Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.

The South Coast AQMD's methodology states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." Therefore, only emissions included in the CalEEMod "on-site" emissions outputs were considered. The nearest sensitive receptors on-site the existing classrooms 40 feet (12 meters) to the east. The nearest sensitive receptor off-site are the single-family residences located 100 feet (30.5 meters) west of the Project. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, LSTs for receptors located 25 meters or less was utilized in this analysis. **Table 8**: *Localized Significance of Construction Emissions*, presents the results of localized emissions during each construction phase. **Table 8** shows that emissions of these pollutants on the peak day of construction would not result in significant concentrations of pollutants at nearby sensitive receptors. Significant impacts would not occur concerning LSTs during construction.

Table 8: Localized Significance of Construction Emissions (Maximum Pounds Per Day)

Construction Activity	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Demolition	6.41	7.47	0.62	0.36
Site Preparation	6.93	3.96	0.46	0.26
Grading	6.41	7.47	0.63	0.48
Paving	5.92	7.03	0.30	0.28
Building Construction	7.03	7.15	0.37	0.34
Architectural Coating	1.41	1.81	0.08	0.08
South Coast AQMD Localized Screening Threshold (adjusted for 1.5 acres at 25 meters)	*303*	*1,351*	*10*	*6*
Exceed South Coast AQMD Threshold?	**No**	**No**	**No**	**No**

Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.

Localized Operational Significance Analysis

According to the South Coast AQMD LST methodology, LSTs would apply to the operational phase of a project only if it includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). Since the Project is a school, the operational phase LST protocol is conservatively applied to both the area source and all the mobile source emissions. LSTs thresholds for receptors located at 25 meters or less were conservatively utilized in this analysis because the nearest on-site receptors are the existing classrooms 40 feet (12 meters) to the east and the nearest off-site receptors are the single-family residences located 100 feet (30.5 meters) west of the Project.

The LST analysis only includes on-site sources. However, the CalEEMod model outputs do not separate on- and off-site emissions for mobile sources. Emissions shown in **Table 9**: *Localized Significance of Operational Emissions*, conservatively include all on-site Project-related stationary sources and 5 percent of the total Project-related new mobile sources, since a portion of mobile sources could include parents queuing up to pick up students. It should be noted that Imagine Charter School provides before school and after school programs resulting in staggered drop off and pick up times, reducing traffic and idling times. **Table 9** shows that the maximum daily emissions of these pollutants during operations would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, significant impacts would not occur concerning LSTs during operational activities.

Table 9: Localized Significance of Operational Emissions (Maximum Pounds Per Day)

Activity	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
On-Site and Mobile Source Emissions	11.84	40.14	0.80	0.22
South Coast AQMD Localized Screening Threshold (1 acres at 25 meters)	*162*	*661*	*1*	*1*
Exceed South Coast AQMD Threshold?	**No**	**No**	**No**	**No**

Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.

Criteria Pollutant Health Impacts

On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's air emissions to health impacts or explain why such information could not be ascertained (*Sierra Club v. County of Fresno* [Friant Ranch, L.P.] [2018] Cal.5th, Case No. S219783).

The Friant Ranch Project was a 942-acre Specific Plan that involved a commercial master planned community of approximately 2,500 dwelling units and extensive commercial supporting development. The anticipated air quality impacts resulting from this development included significant and unavoidable emissions of multiple criteria pollutants (including significant emissions of both primary O_3 precursors [NO_X and ROGs]) at levels that exceeded the daily thresholds of significance. The Project's operational emissions will not exceed the South Coast AQMD's significance thresholds, resulting in a less than significant impact.

The South Coast AQMD has set its CEQA significance thresholds based on the FCAA, which defines a major stationary source (in extreme ozone nonattainment areas such as the South Coast Air Basin) as emitting 10 tons per year. The thresholds correlate with the trigger levels for the federal New Source Review (NSR) Program and South Coast AQMD Rule 1303 for new or modified sources. The NSR Program[5] was created by the FCAA to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based federal ambient air quality standards. The federal ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect the public health. Therefore, projects that do not exceed the South Coast AQMD's LSTs and mass emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and no criteria pollutant health impacts.

NO_X and ROG are precursor emissions that form ozone in the atmosphere in the presence of sunlight where the pollutants undergo complex chemical reactions. It takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources. Breathing ground-level ozone can result health effects that include: reduced lung function, inflammation of airways, throat irritation, pain, burning, or discomfort in the chest when taking a deep breath, chest tightness, wheezing, or shortness of breath. In addition to these effects, evidence from observational studies strongly indicates that higher daily ozone concentrations are associated with increased asthma attacks, increased hospital admissions, increased daily mortality, and other markers of morbidity. The consistency and coherence of the evidence for effects upon asthmatics suggests that ozone can make asthma symptoms worse and can increase sensitivity to asthma triggers.

According the South Coast AQMD's 2016 AQMP, ozone, NO_X, and ROG have been decreasing in the Basin since 1975 and are projected to continue to decrease in the future. Although vehicle miles traveled in the Basin continue to increase, NO_X and ROG levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NO_X emissions from electric utilities have also decreased due to the use of cleaner fuels and renewable energy. The 2016 AQMP demonstrates how the South Coast AQMD's control strategy to meet the 8-hour ozone standard in 2023 would lead to sufficient NO_X emission reductions to attain the 1-hour ozone standard by 2022. In addition, since NO_X emissions also lead to the formation of $PM_{2.5}$, the NO_X reductions needed to meet the ozone standards will likewise lead to improvement of $PM_{2.5}$ levels and attainment of $PM_{2.5}$ standards.

The South Coast AQMD's air quality modeling demonstrates that NO_X reductions prove to be much more effective in reducing ozone levels and will also lead to significant improvement in $PM_{2.5}$ concentrations. NO_X-emitting stationary sources regulated by the South Coast AQMD include Regional Clean Air Incentives Market (RECLAIM) facilities (e.g., refineries, power plants, etc.), natural gas combustion equipment (e.g., boilers, heaters, engines, burners, flares) and other combustion sources that burn wood or propane. The 2016 AQMP identifies robust NO_X reductions from new regulations on 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 but 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 AQMD 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 AQMD also emphasizes that beginning in 2012, continued implementation of previously adopted regulations will lead to NO_X emission reductions of 68 percent by 2023 and 80 percent by 2031. With the addition of 2016 AQMP proposed 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.

Part of the control process of the South Coast AQMD's duty to greatly improve the air quality in the SCAB is the uniform CEQA review procedures required by South Coast AQMD's CEQA Handbook. The single threshold of significance used to assess direct project and cumulative impacts has improved air quality as evidenced by the track record of the air quality in the SCAB dramatically improving over the course of the past decades. As stated by the South Coast AQMD, the thresholds of significance are based on factual and scientific data and are therefore appropriate thresholds of significance to use for the Project.

As previously discussed, localized effects of on-site Project emissions on nearby receptors were found to be less than significant. The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable state or federal ambient air quality standard. The LSTs were developed by the South Coast AQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. The ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations. As shown above, Project-related emissions would not exceed the regional thresholds or the LSTs, and therefore would not exceed the ambient air quality standards or cause an increase in the frequency or severity of existing violations of air quality standards. Therefore, sensitive receptors would not be exposed to criteria pollutant levels in excess of the health-based ambient air quality standards.

Carbon Monoxide Hotspots

An analysis of CO "hot spots" is needed to determine whether the change in the level of service of an intersection resulting from the Project would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined. Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard.

The South Coast Air Basin (SCAB) was re-designated as attainment in 2007 and is no longer addressed in the South Coast AQMD's AQMP. The 2003 AQMP is the most recent version that addresses CO concentrations. As part of the South Coast AQMD *CO Hotspot Analysis*, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35-ppm Federal standard. The Project considered herein would not produce the volume of traffic required to generate a CO hot spot in the context of South Coast AQMD's *CO Hotspot Analysis*. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection even as it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any vicinity intersections resulting

[5] Code of Federal Regulation (CFR) [i.e., PSD (40 CFR 52.21, 40 CFR 51.166, 40 CFR 51.165 (b)), Non-attainment NSR (40 CFR 52.24, 40 CFR 51.165, 40 CFR part 51, Appendix S)

from 1,506 additional vehicle trips attributable to the Project. Therefore, impacts would be less than significant.

Construction-Related Diesel Particulate Matter

Construction would result in the generation of DPM emissions from the use of off-road diesel equipment required. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. If construction occurs while school is in session, the closest sensitive receptors would be located approximately 40 feet to the east, if construction occurs while the school is not in session, the nearest receptors are residential properties 100 feet to the west.

California Office of Environmental Health Hazard Assessment has not identified short-term health effects from DPM. Construction is temporary and would be transient throughout the site (i.e., move from location to location) and would not generate emissions in a fixed location for extended periods of time. Construction would be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than 5 minutes to further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. For these reasons, DPM generated by construction activities, in and of itself, would not be expected to expose sensitive receptors to substantial amounts of air toxics and the Project would have a less than significant impact.

Mitigation Measures: No mitigation is required.

Level of Significance: Less than significant impact.

d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

No impact.

Construction

Odors that could be generated by construction activities are required to follow South Coast AQMD Rule 402 to prevent odor nuisances on sensitive land uses. South Coast AQMD Rule 402, Nuisance, states:

> *A person shall not 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.*

During construction-related activities, some odors (not substantial pollutant concentrations) that may be detected are those typical of construction vehicles (e.g., diesel exhaust from grading and construction equipment). These odors are a temporary short-term impact that is typical of construction projects, are not expected to affect a substantial number of people, and would disperse rapidly. Therefore, impacts related to odors associated with the Project's construction-related activities would be less than significant.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Operational
The South Coast AQMD *CEQA Air Quality Handbook* identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project would not include any of the land uses that have been identified by the South Coast AQMD as odor sources. Therefore, the proposed Project would not create objectionable odors.

Mitigation Measures: No mitigation is required.

Level of Significance: No impact.

Source(s): Air Quality Assessment (Appendix A), Riverside County General Plan, Riverside County Climate Action Plan ("CAP"), South Coast AQMD CEQA Air Quality Handbook

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

BIOLOGICAL RESOURCES Would the project:				
7. Wildlife & Vegetation **a)** Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?	☐	☐	☐	☒

No Impact. The project site is fully developed with an existing school (formerly a church facility) which is developed with associated facilities, restrooms, playground, shade structures, softball field, parking areas, ornamental grasses and non-native trees. The Project site is not located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan. Therefore, no impact would occur.

b) Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?	☐	☐	☐	☒

No impact. The entire project site is developed and does not contain biological resources. No habitat modifications would occur as part of the proposed project activities. As noted in the Riverside County Parcel Report, the project site is not located in a Coachella Valley (CVMSHCP) conservation, fee area, or cell number; it is not located in a Western Riverside County Multi-Species Habitat Conservation Plan (WRMSHCP) Cell Group, nor is it located in a Habitat Acquisition and Negotiation Strategy/Expedited Review Process (HANS/ERP) area. As such, due to the absence of any impacts to habitat, no impact would occur.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service?	☐	☐	☒	☐

Less than Significant Impact. The project site is located in a previously fully disturbed and graded site currently utilized as an ornamental grass area and parking area.

Although the project is not anticipated to disturb natural habitat, the Riverside County parcel report identifies the project site as being located in, or partially within, the Stephen's Kangaroo Rat (SKR) Fee Area and in abundance of caution, is required under Ordinance (Ord.) 824 to pay a Transportation Uniform Mitigation Fee (TUMF) fee. Because the project is not anticipated to impact natural habitat and with the payment of the Western TUMF fees, impacts would be less than significant.

d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒

No Impact. The Project site is currently fully developed, not within a recognized wildlife corridor, and it is anticipated that the removal of the ornamental grass and vehicle parking spaces and the installation of the three modular buildings would not impede wildlife movement. The project would not result in the removal of vegetation (i.e., trees and shrubs) with the potential to support nesting migratory birds that are protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. An alignment of mature trees occur throughout the parcel, but the trees would be preserved and no impact would occur to any potential birds that might use the trees for nesting or resting purposes. No impact would occur.

e)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?	☐	☐	☐	☒

No Impact. The Project area is currently fully developed and does not have native habitats on-site. Additionally, no drainage that would impact riparian habitats, or aquatic features occurs on-site. Therefore, implementation of the project would result in no impact to riparian habitat nor would it affect any sensitive natural communities. No impact would occur.

f)	Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒

No Impact. As discussed above in Section 4, Biological Resources, Response (b and e), the project site does not contain potential jurisdictional features, including Federally protected wetlands or other features that carry water. Therefore, no impacts would occur.

g)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

No Impact. The County's Development Code Chapter 12.24, section 12.24.010 states that, "No person shall remove any living native tree on any parcel or property greater than one-half acre in size, located in an area above five thousand feet in elevation and within the unincorporated area of the County, without first obtaining a permit to do so, unless exempted by the provisions of Section 12.24.040, Exemptions.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

The existing on-site trees are currently maintained and would not be impacted due to project implementation; therefore, the project would not require a tree removal permit pursuant to Chapter 12.24. No conflict with any local policy is anticipated; nor is a conflict anticipated with ordinances protecting biological resources such as a tree preservation policy. Because the project is not anticipated to conflict with a tree preservation policy or ordinance, no impact would occur.

Source(s): GIS database, WRCMSHCP and/or CVMSHCP; On-site Inspection; County of Riverside. (2016). *San Jacinto Valley Area Plan; Land Use Map.* Available at: https://planning.rctlma.org/Portals/14/genplan/general_Plan_2017/areaplans/SJVAP_120616.pdf?ver=2017-10-06-094252-663, accessed on May 5, 2020; County of Riverside. (2019) *Riverside County Parcel Report.* Available at: https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public, accessed on October 5, 2020;

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

CULTURAL RESOURCES Would the project:				
8. Historic Resources				
a) Alter or destroy a historic site?	☐	☐	☐	☒

No Impact. None of the existing onsite structures are of historical age and the project site is not officially designated as a historic site. The project site is not located in a historic preservation district.[6] No impact to a historic site would occur.

b) Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?	☐	☐	☒	☐

Less than Significant. The implementation of the proposed project would not alter or destroy any existing buildings or any other existing structures of historical importance. Additionally, because the project site has been previously fully graded and compacted to achieve the leveled exiting site conditions, it is anticipated that minimal ground disturbance would occur. The maximum ground disturbance is anticipated at 2' feet in depth which is necessary to level the modular buildings on the ground. Because the project site has been previously graded, and because the anticipated excavation depth would be shallow at 2' feet, it is not anticipated that historical resources would be impacted. However, in abundance of caution, the following Mitigation Measures shall be implemented to avoid any impacts to unforeseen historic resources.

Conditions of Approval:

COA CUL-1 In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease, the County shall be notified, and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the ***[TRIBE(S)]*** and/or other applicable tribal entities shall be contacted, as detailed within TCR-1, regarding any pre-contact and/or post-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input to the County with regards to significance and treatment.

[6] Riverside County. 2020. Riverside County Parcel Report, APN: 551220069. (See Appendix A)

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

COA CUL-2 If significant pre-contact and/or post-contact cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to ***[TRIBE(S)]***, and/or other applicable tribal entities shall be contacted, and the County for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

COA CUL-3 If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease, the County shall be notified, and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

With implementation of Conditions of Approval CUL-1 through CUL-3, impacts to historical and archaeological resources would be less than significant.

Source(s): On-site Inspection, Project Application Materials

Findings of Fact: There will be no impacts with implementation of COAs CUL-1 through CUL-3

Mitigation: No Mitigations

Monitoring: No monitoring is required.

9. Archaeological Resources **a)** Alter or destroy an archaeological site?	☐	☐	☐	☒

No Impact. The project site is a former church and is currently a school site, not officially designated as a historic site. The project site is not located in a historic preservation district and no impacts to an archaeological site would occur.[7]

b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?	☐	☐	☒	☐

No Impact. No formal cemeteries are in or near the project area. Most Native American human remains are found in association with prehistoric archaeological sites. As discussed previously in Response 8(b), the project site is not proximate to identified archaeological resources.

The proposed project would require minimal grading at approximately 2' feet in depth. Grading would only occur in the footprint of where the modular buildings will be placed which is also an area previously graded.

As required by State Law, the project is anticipated to adhere to the following during construction activities:

1. If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project; and
2. The Lead Agency and the Project Applicant shall immediately contact the Riverside County Coroner and the applicable designated tribal entity in the event that any human remains are discovered during implementation of the project. 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 shall ensure that notification is provided to the NAHC within twenty-four (24) hours of the determination, as

[7] Riverside County. 2020. Riverside County Parcel Report, APN: 551220069. (See Appendix A)

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

required by California Health and Safety Code §7050.5 (c). The NAHC-identified Most Likely Descendant (MLD), shall be allowed, under California PRC §5097.98 (a), to (1) inspect the site of the discovery and (2) make determinations as to how the human remains and funerary objects shall be treated and disposed of with appropriate dignity. The MLD, project Applicant/developer/landowner, and Lead Agency agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes. The MLD shall complete its inspection and make recommendations within forty-eight (48) hours of being granted access to the site, as required by California PRC §5097.98. Reburial of human remains and/or funerary objects shall be accomplished in compliance with the California PRC §5097.98 (a) and (b). The MLD, in consultation with the project Applicant/developer/landowner, shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains and funerary objects.

The project is anticipated to have a less than significant impact on human remains, including those interred outside of dedicated cemeteries with compliance to applicable laws.

c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

No Impact. Refer to Response 9(b), minimal trenching or ground disturbing activities would occur through the implementation of the proposed project. No formal cemeteries are in or near the project area. The project is anticipated to have a less than significant impact on human remains, including those interred outsides of dedicated cemeteries.

Source(s): On-Site Inspection, Project Application Materials

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

ENERGY Would the project:				
10. Energy Impacts				
a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐

Electricity

Less than Significant. Southern California Edison (SCE) currently services the Imagine Schools Hemet Campus. Implementation of the proposed project would add an additional 48 students for the 2021-22 school year. During each consecutive year the school will add an additional 96 students until Project buildout in 2026. As previously noted, 3 new modular buildings would be added to the site. As noted in Table 1, the 3 buildings would equate to approximately 17,776 square feet of modular buildings with 24 classrooms. Any additional electricity required due to the school expansion would be negligible. No wasteful, inefficient, or unnecessary consumption of energy resources during the project construction or operation would occur.

Any new project materials would comply with the 2019 Building Energy Efficiency Standards, which took effect on January 1, 2020. Some design features include high-efficiency wall assemblies and windows to reduce heating and cooling loads; Energy Star appliances; high-efficiency heating and cooling systems; high efficiency domestic hot water systems; and high-efficiency light-emitting diode (LED) lighting in educational

units, common areas, and landscape design. The project would also be required to comply with the latest applicable building energy efficiency standards, which would minimize building energy consumption.

Natural Gas

The proposed project would not require additional natural gas resources. No Natural Gas resources would be impacted.

Fuel

During construction, transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and mid-size trucks, and construction employee vehicles that would use diesel fuel and/or gasoline. The use of energy resources by these vehicles would fluctuate according to the length of construction and would be temporary.

The proposed project would require demolition of a existing sidewalk, asphalt from parking areas. Minimal grading would be required to level. As such, typical gas-powered or diesel-powered equipment would not be necessary. Impacts related to transportation energy use during construction would not require expanded energy supplies or the construction of new infrastructure.

The Project's increased students represents a nominal change to existing conditions. Additionally, the addition of 2 school buses would minimize the need for additional vehicles traveling to and from the school for pick-up and drop-off. Consequently, the Project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. Project operations would continue to comply with all applicable fuel efficiency standards and would not substantially affect existing fuel supplies or resources. Additionally, fuel consumption associated with vehicle trips generated by the proposed Project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant.

b)	Conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

No impact. Project design and operation of the additional classrooms would comply with State Building Energy Efficiency Standards, appliance efficiency regulations, and green building standards. Project development would not cause inefficient, wasteful and unnecessary energy consumption, and no adverse impact would occur.

Source(s): Riverside County General Plan, Riverside County Climate Action Plan ("CAP"), Project Application Materials

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

GEOLOGY AND SOILS Would the project directly or indirectly:

A Geotechnical Investigation Report Update and Infiltration Testing (April 1, 2020) have been prepared by Inland Foundation Engineering, Inc. The report is available as Appendix B to this IS/MND and is used to answer the following CEQA Thresholds.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
11. Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones 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?	☐	☐	☒	☐

Less than Significant. Because southern California in general is an active fault area, all existing structures have been built according to the corresponding CBC Code and the proposed modular buildings would also be constructed in accordance to the corresponding CBC Code. The existing building "B" is set back approximately 160' feet from the San Jacinto fault line which traverses the site. The proposed modular buildings would be located approximately 240' feet from the fault line. No additional building structures are proposed near the fault line.

The project would not expose people or directly or indirectly cause potential substantial adverse effect including injury or death. Additionally, according to the San Jacinto Valley Area Plan (SJVAP), the project site is not in an Alquist-Priolo Fault Zone, but as previously noted, the site is located in an earthquake fault zone.[8]

The prefabricated modular buildings have been previously approved and permitted by the County of Riverside which meet the required design standards and would continue to meet safety standards. Impacts would be less than significant.

Source(s): Riverside County General Plan Figure S-2 "Earthquake Fault Study Zones," GIS database, Geologist Comments, Geology Report

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

12. Liquefaction Potential Zone a) Be subject to seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

No impact. According to the SJVAP, the project site is in a general area designated as an Area of Moderate Liquefaction Susceptibility.[9] The project would continue to be in conformance with the applicable CBC regulations from when the original existing structures where permitted and erected. No changes to the existing buildings would occur, and grading would be minimal, limited to approximately 2' feet of excavation to level the modular buildings. Excavation would be limited to the footprint of the three modular buildings; the proposed Buildings C and D would be 105' X 72' and Building E would be 47' X 72' feet. Because the modular buildings are prefabricated consistent with the latest CBC, the implementation of the proposed project, would have a less than significant impact from seismic-related ground failure, including liquefaction.

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

Findings of Fact: There will be no impacts.

[8] California Department of Conservation. (2019). *EQ Zapp: California Earthquake Hazards Zone Application*. Accessed on February 24, 2020. Retrieved from: https://www.conservation.ca.gov/cgs/geohazards/eq-zap

[9] Riverside County General Plan. 2016. *SJVAP - Figure 12, Seismic Hazards*. Available at https://planning.rctlma.org/Portals/14/genplan/general_Plan_2017/areaplans/SJVAP_120616.pdf?ver=2017-10-06-094252-663. Accessed on October 6, 2020.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

13. Ground-shaking Zone a) Be subject to strong seismic ground shaking?	☐	☐	☐	☒

No impact. The project site is in an area of high regional seismicity as is most of southern California. Ground shaking originating from earthquakes along active faults in the region is expected to induce lower horizontal accelerations due to smaller anticipated earthquakes and/or greater distances to other faults. Because the proposed modular buildings would be constructed according to the latest CBC standards, standard engineering practices and design criteria, no impact from project implementation would occur.

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

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

No Impact. The Project site is relatively flat with less than a 15 percent slope.[10] The SJVAP identifies three general categories for landslide areas: 1) existing landslides, 2) high susceptibility to seismically induced landslides and rockfalls, 3) low to locally moderate susceptibility to seismically induced landslides and rockfalls.[11] The project site is not within any of the previously mentioned categories. Therefore, no impacts from landslides would occur.

Source(s): On-site Inspection, Riverside County General Plan Figure S-5 "Regions Underlain by Steep Slope," Geology Report

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

[10] Riverside County General Plan. 2016. *SJVAP - Figure 13, Steep Slope.* Available at https://planning.rctlma.org/Portals/14/genplan/general_Plan_2017/areaplans/SJVAP_120616.pdf?ver=2017-10-06-094252-663. Accessed on October 6, 2020.

[11] Riverside County General Plan. 2016. *SJVAP - Figure 14, Slope Instability.* Available at https://planning.rctlma.org/Portals/14/genplan/general_Plan_2017/areaplans/SJVAP_120616.pdf?ver=2017-10-06-094252-663. Accessed on October 6, 2020.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
15. Ground Subsidence a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence?	☐	☐	☐	☒

No impact. Refer to Section 7, Geology and Soils, Response (a)(iv), above. According to the SJVAP, the Project site is located within an area identified for moderate liquefaction susceptibility, and it is also identified as being within an area of potential ground subsidence.[12] Nevertheless, the existing project site buildings would not be expanded or demolished. The new modular buildings would require shallow footings as the modular buildings are lighter than a normal building. Additionally, the modular buildings would be constructed according to the latest CBC standards. As such, the implementation of the proposed project would not create soil instability which would result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. No impact would occur.

Source(s): Riverside County General Plan Figure S-7 "Documented Subsidence Areas Map," Geology Report

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

16. Other Geologic Hazards a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?	☐	☐	☐	☒

No impact. The Project site is a former church and an existing charter school. No geologic hazards that could cause seiche, mudflow, or volcanic hazards are onsite or in the vicinity. Implementation of the proposed project would not change these existing conditions. As such, no impact would occur.

Source(s): On-site Inspection, Project Application Materials, Geology Report

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

17. Slopes a) Change topography or ground surface relief features? b) Create cut or fill slopes greater than 2:1 or higher than 10 feet? c) Result in grading that affects or negates subsurface sewage disposal systems?	☐	☐	☐	☒

No impact. The proposed project would only require shallow excavation and minimal grading. As noted in Response 12(a), the project would required excavation of approximately 2' feet on the modular building footprints. No additional excavation or trenching would be required. Grading and leveling would be minimal, considering the 2' excavation and removal of soil required to level the modular buildings. Dirt removal and

[12] Riverside County. 2020. *Riverside County Parcel Report, APN 551220069*. (See Appendix D)

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

grading would not create ground surface relief features, it would not create slopes, and grading would not affect sewage disposal systems. No impact would occur.

Source(s): Riv. Co. 800-Scale Slope Maps, Project Application Materials, Slope Stability Report

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

18. Soils				
a) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

No impact. The project site is composed of San Emigdio loam, San Emigdio fine sandy loam, and Metz loamy fine sand – sandy loam substratum[13]. According to the County's Municipal Code (MC), the project is subject to Chapter 16.52 – Soil Erosion. Section 16.52.020 notes a list of soils that are to be considered as subject to wind erosion. Based on the existing site soils, the project site is not anticipated to have soils that would be considered prone to wind erosion[14]. As with all construction sites, grading activities always have the potential to expose soils that would be subject to erosion by water. Additionally, the project would adhere to MC 16.52.030, Soil Erosion Control Requirement.

With adherence to the above stated policies, BMPs, State Law, and the Regional Water Quality Control Board (RWQCB) General Construction Permit, which requires the implementation of a variety of BMPs on construction and operation of the project, this would minimize potential erosion from the site over the short- and long-term and a less than significant impact would occur.

b) 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?	☐	☐	☒	☐

No impact. When certain soil types are exposed to water, mainly those with moderate to high clay content, they can deform and either shrink or swell, depending on their particular physical characteristics. Such soils can expose overlying buildings to differential settlement and other structural damage. According to the Natural Resources Conservation Service (NRCS) Web Soil Survey, the site is composed of sands and fine sandy loams, which have moderate infiltration rates.[15] Sandy loams are not considered expansive soils due to their ability to transmit water efficiently. Furthermore, the project would be required to be in conformance with the latest CBC standards. Conformance with standard engineering practices and design criteria, such as modified foundations or over-excavation and soil modification, would reduce the potential for substantial risks to life or property as a result of expansive soils is minimal and the associated impacts would be less than significant.

c) Have soils incapable of adequately supporting use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

[13] Natural Resources Conservation Service. 2020. *Web Soil Survey*. Available at https://casoilresource.lawr.ucdavis.edu/gmap/. Accessed on October 6, 2020.

[14] Riverside County. 2019. *Municipal Code, Chapter16.25 – Soil Erosion, Subsection 16.52.020 – Factors of Consideration*. Available at https://library.municode.com/ca/riverside_county/codes/code_of_ordinances?nodeId=TIT16SU_CH16.52SOER_16.52.040WIERCOPL. Accessed October 6, 2020

[15] NRCS. 2019. *Soil Infiltration – Soil Quality Kit*. Available at https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs142p2_053268.pdf. Accessed March 10, 2020.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

No Impact. The project does not include the installation of sewer or septic systems. The school is currently served by sewer and the school would remain connected to the same sewer system with enough capacity to serve the additional 48 students. No impact related to this issue would occur.

Source(s): U.S.D.A. Soil Conservation Service Soil Surveys, Project Application Materials, On-site Inspection, Soils Report

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

19. Wind Erosion and Blowsand from project either on or off-site.				
a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off-site?	☐	☐	☐	☒

No impact. The project site is an existing school fully graded and operational school site. Minimal grading will occur as part of the installation of the modular buildings. Soil excavation would be minimal, with adherence to the BMPs, no portion of the project would impact or result in the increase in wind erosion and blowsand, either on or off-site.

Source(s): Riverside County General Plan Figure S-8 "Wind Erosion Susceptibility Map," Ord. No. 460, Article XV & Ord. No. 484

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

GREENHOUSE GAS EMISSIONS Would the project:

A Greenhouse Gas Assessment and an Air Quality Assessment (November 2020) have been prepared by Kimley-Horn and Associates. The reports are available as Appendix A to this IS/MND and are used to answer the following CEQA Thresholds.

20. Greenhouse Gas Emissions				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

Less than Significant.

Background

Gases that trap heat in the atmosphere are called greenhouse gases (GHGs). The major concern with GHGs is that increases in their concentrations are causing global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long-term global temperature increases.

The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different warming potential and CO_2 is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e)[16]. For example, SF_6 is a GHG commonly used in the utility industry as an insulating gas in circuit breakers and other electronic equipment. SF_6, while comprising a small fraction of the total GHGs emitted annually world-wide, is a much more potent GHG with 22,800 times the global warming potential as CO_2. Therefore, an emission of one metric ton (MT) of SF_6 could be reported as an emission of 22,800 MT of CO_2e. Large emission sources are reported in million metric tons (MMT) of CO_2e.

Proposed Project

Short-Term Construction Greenhouse Gas Emissions

The Project would result in direct emissions of GHGs from construction. The approximate quantity of daily GHG emissions generated by construction equipment utilized to build the Project is depicted in **Table 10:** *Construction-Related Greenhouse Gas Emissions*.

Table 10: Construction Related Greenhouse Gas Emissions

Category	MTCO2e
Construction	1,509
30-Year Amortized Construction	50.3
Source: CalEEMod Version 2016.3.2. Refer to Appendix A for model outputs	

As shown, the Project would result in the generation of approximately 1,509 $MTCO_2e$ over the course of construction. Construction GHG emissions are typically summed and amortized over the lifetime of the Project (assumed to be 30 years), then added to the operational emissions.[17] The amortized Project construction emissions would be 50.3 $MTCO_2e$ per year. Once construction is complete, the generation of these GHG emissions would cease.

Long-Term Operational Greenhouse Gas Emissions

Operational or long-term emissions occur over the life of the Project. GHG emissions would result from direct emissions such as Project generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from the Project, the emissions associated with solid waste generated from the Project, and any fugitive refrigerants from air conditioning or refrigerators.

Total GHG emissions associated with the Project are summarized in **Table 11**: *Project Greenhouse Gas Emissions*. As shown in Table 4, the Project would generate approximately 1,978.54 $MTCO_2e$ annually from both construction and operations and the Project. The majority of the GHG emissions (95 percent) are associated with non-construction related mobile sources. Emissions of motor vehicles are controlled by State and Federal standards, and the Project has no control over these standards.

[16] A carbon dioxide equivalent (CO_2e) is a metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.

[17] The project lifetime is based on the standard 30-year assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13,* August 26, 2009).

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Table 11: Project Greenhouse Gas Emissions

Emissions Source	MTCO2e per Year Unmitigated
Construction Amortized Over 30 Years	50.3
Area Source	<0.01
Energy	38.55
Mobile	1,872.37
Waste	11.62
Water and Wastewater	5.69
Total	1,978.54
South Coast AQMD Threshold	*3,000*
Exceeds Threshold?	**No**
Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs. Note: Total values are from CalEEMod and may not add up 100% due to rounding.	

b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Less than Significant.

Regional Transportation Plan/Sustainable Communities Strategy Consistency

On September 3, 2020, SCAG's Regional Council adopted Connect SoCal (*2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy* [2020 RTP/SCS]). The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders in the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. SCAG's RTP/SCS establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035 as well as an overall GHG target for the Project region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of Executive Orders 5-03-05 and B-30-15.

The RTP/SCS contains 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 county transportation commissions and seek to reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices for everyone. The RTP/SCS is an important planning document for the region, allowing project sponsors to qualify for federal funding.

The plan accounts for operations and maintenance costs to ensure reliability, longevity, and cost effectiveness. The RTP/SCS is also supported by a combination of transportation and land use strategies that help the region achieve state GHG emissions reduction goals and Federal Clean Air Act (FCAA) requirements, preserve open space areas, improve public health and roadway safety, support our vital goods movement industry, and utilize resources more efficiently. GHG emissions resulting from development-related mobile sources are the most potent source of emissions, and therefore Project comparison to the RTP/SCS is an appropriate indicator of whether the Project would inhibit the post-2020 GHG reduction goals promulgated by the state. The Project's consistency with the RTP/SCS goals is analyzed in detail in **Table 12** *Regional Transportation Plan/Sustainable Communities Strategy Consistency*.

Table 12: Regional Transportation Plan/Sustainable Communities Strategy Consistency

SCAG Goals		Compliance	
GOAL 1:	Encourage regional economic prosperity and global competitiveness.	N/A:	This is not a project-specific policy and is therefore not applicable.
GOAL 2:	Improve mobility, accessibility, reliability, and travel safety for people and goods.	Consistent:	Although this Project is not a transportation improvement project, the Project is located near existing transit routes on E Florida Avenue (Highway 74).
GOAL 3:	Enhance the preservation, security, and resilience of the regional transportation system.	N/A:	This is not a transportation improvement project and is therefore not applicable.
GOAL 4:	Increase person and goods movement and travel choices within the transportation system.	N/A:	This is not a project-specific policy and is therefore not applicable.
GOAL 5:	Reduce greenhouse improve air quality.	Consistent:	The Project is located within an urban area on a site that is already operating as a school. The Project is required to comply with the provisions of the California Building Energy Efficiency Standards Code (CALGreen). Additionally, the project is located adjacent to the bus transit stops, which encourage alternative forms of transportation.
GOAL 6:	Support healthy and equitable communities	Consistent:	As discussed in the Air Quality Assessment and the Health Risk Assessment, the Project would not exceed thresholds or result in health impacts. The Project is located on a site currently operating as a school and designated as Commercial Retail in the General Plan and would not conflict with the surrounding community's ability to access healthy food or parks.
GOAL 7:	Adapt to a changing climate and support an integrated regional development pattern and transportation network.	N/A:	This is not a project-specific policy and is therefore not applicable.
GOAL 8:	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	N/A:	This is not a project-specific policy and is therefore not applicable.
GOAL 9:	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	N/A:	The Project involves expansion of a school and does not include housing however the Project is located within a relatively short walking distance to local bus routes.
GOAL 10:	Promote conservation agricultural lands and habitats.	N/A:	This project is located on a previously developed site and is not located on agricultural lands.

Source: Southern California Association of Governments, *Regional Transportation Plan/Sustainable Communities Strategy*, 2020.

Compliance with applicable State standards would ensure consistency with State and regional GHG reduction planning efforts. The goals stated in the RTP/SCS were used to determine consistency with the planning efforts previously stated. As shown in Table 5, the proposed Project would be consistent with the stated goals of the RTP/SCS. Therefore, the proposed Project would not result in any significant impacts or interfere with SCAG's ability to achieve the region's post-2020 mobile source GHG reduction targets.

Consistency with the CARB Scoping Plan

The California State Legislature adopted AB 32 in 2006. AB 32 focuses on reducing GHGs (CO_2, CH_4, NO_X, HFCs, PFCs, and SF_6) to 1990 levels by the year 2020. Pursuant to the requirements in AB 32, CARB adopted the *Climate Change Scoping Plan* (CCSP) in 2008, which outlines actions recommended to obtain that goal. The CCSP provides a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as the cap-and-trade program, and an AB 32 implementation fee to fund the program. As shown in **Table 13** *Project Consistency with Applicable CARB Scoping Plan Measures*, the Project is consistent with most of the strategies, while others are not applicable to the Project.

The 2017 CCSP Update identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the first update to the CCSP in 2013. Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets. As such, impacts related to consistency with the Scoping Plan would be less than significant.

Table 13: Project Consistency with Applicable CARB Scoping Plan Measures

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
Transportation	California Cap-and-Trade Program Linked to Western Climate Initiative	Regulation for the California Cap on GHG Emissions and Market-Based Compliance Mechanism October 20, 2015 (CCR 95800)	**Not Applicable.** The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers. However, the regulation indirectly affects people who use the products and services produced by these industrial sources when increased cost of products or services (such as electricity and fuel) are transferred to the consumers. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period.
	California Light-Duty Vehicle GHG Standards	Pavley I 2005 Regulations to Control GHG Emissions from Motor Vehicles Pavley I 2005 Regulations to Control GHG Emissions from Motor Vehicles	**Consistent.** This measure applies to all new vehicles starting with model year 2012. The Project would not conflict with its implementation as it would apply to all new passenger vehicles purchased in California. Passenger vehicles, model year 2012 and later, associated with construction and operation of the Project would be required to comply with the Pavley emissions standards.
		2012 LEV III California GHG and Criteria Pollutant Exhaust and Evaporative Emission Standards	**Consistent.** The LEV III amendments provide reductions from new vehicles sold in California between 2017 and 2025. Passenger vehicles associated with the site would comply with LEV III standards.
	Low Carbon Fuel Standard	2009 readopted in 2015. Regulations to Achieve GHG Emission Reductions Subarticle 7. Low Carbon Fuel Standard CCR 95480	**Consistent.** This measure applies to transportation fuels utilized by vehicles in California. The Project would not conflict with implementation of this measure. Motor vehicles associated with construction and operation of the Project would utilize low carbon transportation fuels as required under this measure.
	Regional Transportation-Related GHG Targets.	SB 375. Cal. Public Resources Code §§ 21155, 21155.1, 21155.2, 21159.28	**Consistent.** The Project would provide development in the region that is consistent with the growth projections in the RTP/SCS.
	Goods Movement	Goods Movement Action Plan January 2007	**Not applicable.** The Project does not propose any changes to maritime, rail, or intermodal facilities or forms of transportation.
	Medium/Heavy-Duty Vehicle	2010 Amendments to the Truck and Bus Regulation, the Drayage Truck Regulation and the	**Consistent.** This measure applies to medium and heavy-duty vehicles that operate in the state. The Project would not conflict with implementation of this measure. Medium and heavy-duty vehicles

		Tractor-Trailer GHGRegulation	associated with construction and operation of the Project would be required to comply with the requirements of thisregulation.
	High Speed Rail	Funded under SB 862	**Not applicable.** This is a statewide measure that cannot be implemented by a project applicant or Lead Agency.
Electricity and Natural Gas	Energy Efficiency	Title 20 Appliance Efficiency Regulation	**Consistent.** The Project would not conflict with implementation of this measure. The Project would comply with the latest energy efficiency standards.
		Title 24 Part 6 Energy Efficiency Standards for Residential and Non-Residential Building	
		Title 24 Part 11 California Green Building Code Standards	
	Renewable Portfolio Standard/Renewable Electricity Standard.	2010 Regulation to Implement the Renewable Electricity Standard (33% 2020)	**Consistent.** The Project would obtain electricity from the electric utility, Southern California Edison (SCE). In 2018 SCE obtained 42 percent of its power supply from renewable sources, including large hydroelectric projects. Therefore, the utility would provide power when needed on-site that is composed of a greater percentage of renewable sources.
	Million Solar Roofs Program	SB 350 Clean Energy and Pollution Reduction Act of 2015 (50% 2030)	
	Million Solar Roofs Program	Tax Incentive Program	**Consistent.** This measure is to increase solar throughout California, which is being done by various electricity providers and existing solar programs. The program provides incentives that are in place at the time of construction.
Water	Water	Title 24 Part 11 California Green Building Code Standards	**Consistent.** The Project would comply with the CalGreen standards, which requires a 20 percent reduction in indoor water use
		SBX 7-7—The Water Conservation Act of 2009	
		Model Water Efficient Landscape Ordinance	
Green Buildings	Green Building Strategy	Title 24 Part 11 California Green Building Code Standards	**Consistent.** The State is to increase the use of green building practices. The Project would implement required green building strategies through existing regulation that requires the Project to comply with various CalGreen requirements. The Project includes sustainability design features that support the Green Building Strategy.
Industry	Industrial Emissions	2010 CARB Mandatory Reporting Regulation	**Not applicable.** The Mandatory Reporting Regulation requires facilities and entities with more than 10,000 MTCO2e of combustion and process emissions, all facilities belonging to certain industries, and all electric power entities to submit an annual GHG emissions data report directly to CARB. As shown above, although total Project GHG As shown above, the majority of GHG emissions would be mobile sources, and stationary Project GHG emissions would not exceed 10,000 MTCO2e. Therefore, this regulation would not apply.
Recycling and Waste Management	Recycling and Waste	Title 24 Part 11 California Green Building Code Standards	**Consistent.** The Project would not conflict with implementation of these measures. The Project is required to achieve the recycling mandates via compliance with the CALGreen code.
Forests	Sustainable Forests	Cap and Trade Offset Projects	**Not applicable.** The Project is in an area designated for urban uses. No forested lands exist on-site.
High Global Warming Potential	High Global Warming Potential Gases	CARB Refrigerant Management Program CCR 95380	**Consistent.** The regulations are applicable to refrigerants used by large air conditioning systems and large commercial and industrial refrigerators and cold storage system. The Project would not conflict

			with the refrigerant management regulations adopted by CARB.
Agriculture	Agriculture	Cap and Trade Offset Projects for Livestock and Rice Cultivation	**Not applicable.** The Project site is designated for urban development. No grazing, feedlot, or other agricultural activities that generate manure occur currently exist on-site or are proposed to be implemented by the Project.
Source: California Air Resources Board, *California's 2017 Climate Change Scoping Plan*, November 2017 and CARB, *Climate Change Scoping*			

As seen in **Table 12** and **Table 13**, the Project would be consistent with all applicable plan goals. As shown in **Table 11**, the Project is estimated to emit approximately 1,978.54 $MTCO_2e$ per year with majority of emissions coming indirectly from off-site motor vehicles.

Regarding goals for 2050 under Executive Order S-3-05, at this time it is not possible to quantify the emissions savings from future regulatory measures, as they have not yet been developed; nevertheless, it can be anticipated that operation of the proposed Project would benefit from the implementation of current and potential future regulations (e.g., improvements in vehicle emissions, SB 100/renewable electricity portfolio improvements, etc.) enacted to meet an 80 percent reduction below 1990 levels by 2050.

The Project's long-term operational GHG emissions would not exceed South Coast AQMD's threshold of 3,000 $MTCO_2e$ per year and would not conflict with any applicable plan, policy, or regulation of an agency adopted to reduce GHG emissions, including Title 24, AB 32, and SB 32. Therefore, Project impacts would be less than significant.

Mitigation Measures: No mitigation is required.

Level of Significance: Less than significant impact.

Cumulative Setting

Cumulative Setting

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and TACs, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about 1 day), GHGs have much longer atmospheric lifetimes of 1 year to several thousand years that allow them to be dispersed around the globe.

Cumulative Impacts

It is generally the case that an individual project of the proposed Project's size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of Project-related GHG emissions would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. In addition, the proposed Project as well as other cumulative related projects, would be subject to all applicable regulatory requirements, which would further reduce GHG emissions. The proposed Project would be consistent with SCAG's 2020-2045 RTP/SCS, and CARB's Scoping Plan. As a result, the Project would not conflict with any GHG reduction plan. Therefore, the Project's cumulative contribution of GHG emissions would be less than significant and the Project's cumulative GHG impacts would also be less than cumulatively considerable.

Mitigation Measures: No mitigation is required.

Level of Significance: Less than significant impact.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Source(s): Riverside County General Plan, Riverside County Climate Action Plan ("CAP"), Project Application Materials

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

HAZARDS AND HAZARDOUS MATERIALS Would the project:				
21. Hazards and Hazardous Materials				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				

Less than Significant. The project site is not included on the list of hazardous waste sites (Cortese List) compiled by the Department of Toxic Substances Control (DTSC) pursuant to Government Code Section 65962.5 and therefore is not anticipated to release known hazardous materials due to ground disturbing activities.[18] The closest active sites identified in EnviroStor are two sites identified as Voluntary Cleanup sites located approximately 2.0 miles northwest at So Cal Gas/Hemet MGP located at So. Oakland Avenue at SF Railroad and Southern California Edison San Jacinto Substation located at south San Jacinto Avenue just southwest of Main Street.

Construction

Both the EPA and the US Department of Transportation (DOT) regulate the transport of hazardous waste and material, including transport via highway. The EPA administers permitting, tracking, reporting, and operations requirements established by the Resource Conservation and Recovery Act. The DOT regulates the transportation of hazardous materials through enforcement of the Hazardous Materials Transportation Act. This act includes requirements for container design and labeling, as well as for driver training. The established regulations are intended to track and manage the safe interstate transportation of hazardous materials and waste. Additionally, State and local agencies enforce the application of these acts and coordinate safety and mitigation responses in the case that accidents involving hazardous materials occur.

A majority of the project building process would occur off-site. Generally, the buildings will undergo a Modular Building Process which means that the individual buildings are built in a controlled factory setting using an assembly line process, beginning with the frame and ending with the interior and exterior finishes.[19] Depending on the size, completed modules are delivered on-site and pieced together to form a complete building. Construction activities are anticipated to include minimal excavation because the project site has been previously graded and is relatively flat. However, some grading would be required for site drainage, foundation construction, and utility installation and use of machinery to complete the installation of the modular buildings. However, no hazardous conditions are anticipated to be created as part of the project construction activities.

[18] Department of Toxic Substances Control (DTSC) EnviroStor. 2020. *Hazardous Waste and Substances Site List.* Available at: https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=42655+Florida+Ave%2C+Hemet%2C+CA+92544. Accessed on October 6, 2020.

[19] Vanguard Modular Building Systems. 2018. *How are Modular Buildings Built?*. Available at https://vanguardmodular.com/blog/modular-buildings-built/

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Operations

Project operations would continue to be essentially the same as existing conditions. The addition of 48 additional students for the 2021/22 school year would not significantly increase use, storage, and disposal of hazardous materials which can include, but are not limited to art supplies, cleaning supplies and equipment (e.g., drain cleaners, floor stripping products, paints, oils, fuels) (U.S. EPA 2006).

As part of the school's curriculum, chemicals could be handled for science classes; thus, the proposed charter school must comply with regulations regarding the management, transport, and disposal of hazardous waste in accordance with the EPA's Resource Conservation and Recovery Act and other applicable State and local requirements (EPA 2006, 2018a). With compliance with EPA's Resource Conservation and Recovery Act, the project would cause a less than significant impact from the routine transport, use, or disposal of hazardous materials.

c)	Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?	☐	☐	☐	☒

No Impact. The proposed project would not affect any County emergency response plans or emergency evacuation plans. No road closures and/or street obstructions would occur as all project construction would occur on-site and because the modular buildings are prefabricated, minimal construction activities would occur on site. No impact would occur to an adopted emergency response plan or emergency evacuation plan.

d)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school?	☐	☐	☐	☒

No impact. The implementation of the project is not expected to generate hazardous emissions or use large quantities of hazardous materials aside from those required to conduct chemistry and biological classes and typical cleaning solvents, and fuels required to power lawn mowers and other maintenance equipment. Furthermore, the project site is not a known source of hazardous materials or where a spill or cleanup has previously occurred. Additionally, school sites are required to be free of contamination or, if the properties were previously contaminated, they must be cleaned up under DTSC's oversight. Because the proposed project is not documented as a hazardous site, and it is not likely that the school will emit significant amounts of hazardous or acute hazardous materials from common operations; impacts would be less than significant.

e)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

No Impact. Refer to Section 9, Hazards and Hazardous Materials, Response 9(a), above. The project site is not included on the list of hazardous waste sites (Cortese List) compiled by the DTSC pursuant to Government Code Section 65962.5. Therefore, as a result, the project would not create a significant hazard to the public or the environment. No impact would occur.

Source(s): Project Application Materials

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
22. Airports				
a) Result in an inconsistency with an Airport Master Plan?	☐	☐	☐	☒
b) Require review by the Airport Land Use Commission?				
c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				
d) For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area?				

No Impact. According the SJVAP, the nearest airport is the Hemet-Ryan Airport located approximately 5.5 miles southwest of the project site. The project is not within an airport land use plan, it is not located within 2.0 miles from a public or private airport. The project does not conflict with an Airport Master Plan, and implementation of the proposed project would not change that. The project site would not be located in an area exposed to excessive airport noise. No impact would occur.

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

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

HYDROLOGY AND WATER QUALITY Would the project:

A Preliminary Water Quality Management Plan and Drainage Memorandum (February 20, 2020) have been prepared by Kimley-Horn and Associates. The reports are available as Appendix C to this IS/MND and are used to answer the following CEQA Thresholds.

23. Water Quality Impacts				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐	☒

No impact. The ICSH is a fully functional and permitted school facility with all required utilities. The additional students proposed for the Project would not create conditions that would violate water quality or waste discharge requirements. No components of the proposed Project would degrade surface or ground water quality. No impact would occur.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒

Less than Significant. The school's potable water supply is provided by Lake Hemet Municipal Water District (LHMWD). The proposed Project proposed to add additional students and staff member which would required an additional negligible amount of water. The increase in students and staff is not anticipated to substantially decrease groundwater supplies or interfere substantially with groundwater recharge. A less than significant impact would occur.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
No impact. The site does not include any streams or rivers, which could be altered by the project. In addition, the proposed Project does not propose any grading, trenching, or the construction or expansion of any buildings that could alter the existing drainage pattern. The Project site would continue to drain without any changes to the pattern. No impact would occur.				
e) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?	☐	☐	☐	☒
No impact. The site does not include any streams or rivers, which could be altered by the project. The additional modular buildings would not substantially increase the amount of surface runoff that would result in flooding. The proposed Project not alter the existing runoff rates and no increase in surface runoff or flooding on- or off-site would occur from Project implementation.				
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?	☐	☐	☐	☒
No impact. The proposed Project would not create or contribute additional runoff water. No impact would occur to existing planned stormwater drainage systems, nor would the Project create additional polluted runoff.				
g) Impede or redirect flood flows?	☐	☐	☐	☒
No impact. The proposed Project would not introduce any new features that would impede or redirect existing onsite flows. No impact to the topography would occur.				
h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?	☐	☐	☐	☒
No impact. The Project site is located approximately 59 miles inland from the Pacific Ocean. Given the distance from the coast, the potential for the Project site to be inundated by a large, catastrophic tsunami is extremely low. No steep slopes are in the project vicinity; therefore, the risk of mudflow is insignificant. However, the Project site is identified as being in flood path of the Seven Oaks Dam in the event of the dam's failure. [20] However, FEMA identifies the Project area as Zone X,[21] an area identified as having a 0.2 percent chance of flood. The implantation of the proposed Project would not alter any of these existing conditions. No impact would occur.				
i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒
No impact. The proposed Project would not create any exterior physical changes that could obstruct or conflict with implementation of a water quality control plan or sustainable groundwater management plan. The Project involves additional classrooms and associated improvements that would not deplete water resources on a fully functional Project site. No impact would occur.				

[20] General Plan. 2005. *Figure S-2, Seven Oaks Damn Inundation Map.*
[21] FEMA. 2016. *Flood Insurance Rate Map.*

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Source(s): Riverside County General Plan Figure S-9 "Special Flood Hazard Areas," Figure S-10 "Dam Failure Inundation Zone," Riverside County Flood Control District Flood Hazard Report/ Condition, GIS database

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

LAND USE/PLANNING Would the project:

24. Land Use **a)** Physically divide an established community? **b)** 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?	☐	☐	☐	☒

No impact. The existing General Plan designation for the project site is Commercial Retail (CR) and zoned as Scenic Highway Commercial (C-P-S). The proposed project would continue to be consistent with current land use and zoning designations under the County GP and Ordinance No. 348. The general project vicinity is an urban built area. The project site is an existing charter school used for educational purposes. The school would continue to serve in the same manner with implementation of the proposed modular buildings. The proposed project would not create a situation where the existing school would become inconsistent with the applicable land use plan, policy or regulations. Implementation of the proposed project would result in no impact to the established community.

Source(s): Riverside County General Plan, GIS database, Project Application Materials

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

MINERAL RESOURCES Would the project:

25. Mineral Resources **a)** Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State? **b)** Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

No Impact. According to the County's GP Figure OS-6; *Mineral Resource Zone,* the project is designated as Mineral Resource Zone-3 (MRZ-3). The project site is not located in an area identified as a locally important mineral resource recovery site and is not a mining area as shown in Figure OS-6 of the County General Plan.

Implementation of the proposed project would not introduce physical changes to the site which would result in the loss of mineral resources, or impact to a locally-important mineral resources site. No impact would occur.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?	☐	☐	☐	☒

No impact. The project site is an existing charter school that is fully functional and permitted. No portion of the site is known cause hazards from abandoned quarries or mines. No impact would occur.

Source(s): Riverside County General Plan Figure OS-6 "Mineral Resources Area"

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

NOISE Would the project result in:

An Acoustical Assessment (November 2020) has been prepared by Kimley-Horn and Associates. The reports are available as Appendix D to this IS/MND and are used to answer the following CEQA Thresholds.

26. Airport Noise				
a) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
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?				

No impact. The Hemet-Ryan Airport is the nearest airport in the immediate area, located approximately 5.5 miles southwest of the Project site. There are no other airports within two miles of the Project site. Therefore, there is no impact surrounding the proposed Project concerning airport noise.

Source(s): Riverside County General Plan Figure S-20 "Airport Locations," County of Riverside Airport Facilities Map

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

27. Noise Effects by the Project				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐

Less than Significant with Mitigation Incorporated.

Short-Term Construction Impacts

Project construction would include demolition, site preparation, grading, building construction, paving, and architectural coating. Such activities would require tractors, dozers, and concrete saws during demolition; graders and tractors during site preparation and grading; pavers, rollers, mixers, tractors, and paving equipment during paving; cranes, forklifts, and tractors during building construction; and air compressors during architectural coating.

Section 9.52.020 of the County's Noise Regulation ordinance indicates that noise associated with any private construction activity located 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. However, this analysis conservatively uses the Federal Transit Administration (FTA)'s threshold of 80 dBA (8-hour L_{eq}) for residential uses and 85 dBA (8-hour L_{eq}) for non-residential uses to evaluate construction noise impacts.

Following FTA's methodology for quantitative construction noise assessments, Federal Highway Administration's Roadway Construction Noise Model (RCNM) was used to predict construction noise. The noise levels calculated in **Table 14**: *Project Construction Noise Levels*, show estimated exterior construction noise. Following FTA methodology, when calculating construction noise, all equipment is assumed to operate at the center of the Project because equipment would operate throughout the Project site and not at a fixed location for extended periods of time. Therefore, the distances used in the RCNM model were 90 feet for the nearest classroom and 130 feet for the nearest residential property. During construction, temporary fencing would be set up around the construction area for the protection of students and faculty. As shown in Table 14, unmitigated construction during the demolition and site preparation phases would exceed the 80 dBA threshold at the nearest classroom. Therefore, if construction occurs while school is in session, Mitigation Measure Noise -1 would require temporary fencing with acoustical blankets or similar technology be set up around the construction area for the protection of students and faculty. This fencing would break the line of sight and provide some noise reduction (3dBA reduction). In addition, the nearest residential properties are surrounded by a masonry wall which would further reduce noise levels (8 dBA reduction).

Table 14: Project Construction Noise Levels

Construction Phase	Modeled Exterior Construction Noise Level at Nearest Classroom (dBA L_{eq})	Modeled Exterior Construction Noise Level at Nearest Residence (dBA L_{eq})	Noise Threshold (dBA L_{eq})	Exceed Threshold?
Demolition	81.3	70.1	80.0	YES
Site Preparation	81.5	70.3	80.0	YES
Grading	79.0	67.8	80.0	No
Paving	79.2	68.0	80.0	No
Construction	79.1	67.9	80.0	No
Painting	68.6	57.4	80.0	No
Source: Federal Highway Administration, *Roadway Construction Noise Model,* 2006. Refer to Appendix D for noise modeling results.				

Compliance with the County's Noise Regulation Ordinance would minimize impacts from construction noise, as construction would be limited to daytime hours between 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. By following the County's Noise Regulation Ordinance, Project construction activities would result in a less than significant noise impact.

Long-Term Operational Impacts

Implementation of the Project would result in on-site operational noise similar to existing conditions. The addition of three new modular buildings would not result in a significant increase in stationary noise and no new impacts would occur. However, expansion of the existing school would increase noise levels from mobile sources in the Project vicinity as a result of increased off-site traffic. The increase in the number of students generated by the proposed Project would result in additional traffic on adjacent roadways, thereby increasing vehicular noise near existing and proposed land uses. Based on the Traffic Impact Analysis, the proposed Project would result in approximately 1,286 additional average daily traffic (ADT). The Without Project and With Project scenarios are compared in **Table 15**: *Traffic Noise Levels*.

Table 15: Traffic Noise Levels

Roadway Segment	Without Project		With Project		Change	Significant Impacts
	ADT	dBA CNEL at 100 feet from Roadway Centerline	ADT	dBA CNEL at 100 feet from Roadway Centerline		
Florida Avenue, between Santa Fe Street and San Jacinto Street	23,059	64.4	23,315	64.4	0.0	No
Florida Avenue, between San Jacinto Street and Girard Street	24,512	64.7	24,960	64.7	0.0	No
Florida Avenue, between Girard Street and Columbia Street	22,449	64.3	22,897	64.4	0.1	No
Florida Avenue, between Columbia Street and Stanford Street	19,407	64.9	19,983	65.1	0.2	No
Florida Avenue, between Stanford Street and Meridian Street	17,547	64.5	18,187	64.6	0.1	No
Florida Avenue, between Meridian Street and Hemet Street	16,947	64.3	17,587	64.5	0.2	No
Florida Avenue, between Hemet Street and Soboba Street	14,956	63.8	15,596	64.0	0.2	No
Hemet Street, between Florida Avenue and Ramona Expressway	4,570	57.2	4,570	57.2	0.0	No
Ramona Expressway, between Hemet Street and Esplanade Avenue	19,636	68.1	20,023	68.2	0.1	No
Ramona Expressway, between Esplanade Avenue and Main Street	23,700	69.0	23,959	69.0	0.0	No
ADT = average daily trips; dBA = A-weighted decibels; CNEL = community noise equivalent level.						
Source: Based on traffic data within the *Traffic Impact Study*, prepared by Kimley-Horn, 2020. Refer to Appendix D for traffic noise modeling assumptions and results.						

As shown in **Table 15**, roadway noise levels would range from 57.2 dBA to 69.0 under both Without Project and With Project conditions. The highest noise levels would occur along Ramona Expressway, between Esplanade Avenue and Main Street. As shown in **Table 15**, Project generated traffic would result in a maximum increase of 0.2 dBA. As the noise level increase is not noticeable (i.e., a less than 3.0 dBA increase), a less than significant impact would occur in this regard.

Mitigation Measure NOISE-1 If construction occurs while school is in session, temporary fencing with acoustical blankets or similar technology will be set up around the construction area for the protection of students and faculty.

b)	Generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐

Less than Significant. Once operational, the Project would not be a source of groundborne vibration. Increases in groundborne vibration levels attributable to the proposed 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.

The FTA has published standard vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 in/sec) appears to be conservative. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. For example, for a building that is constructed with reinforced concrete, steel, or timber with no plaster, the FTA guidelines show that a vibration level of up to 0.50 in/sec is considered safe and would not result in any construction vibration damage. Buildings that are constructed with non-engineered timber and masonry buildings can sustain vibrations levels up to 0.20 in/sec and would not result in vibration damage.

Table 16: *Typical Construction Equipment Vibration Levels*, lists vibration levels at 25 feet for typical construction equipment. Groundborne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. As indicated in **Table 16**, based on FTA data, vibration velocities from typical heavy construction equipment operations that would be used during Project construction range from 0.003 to 0.089 in/sec PPV at 25 feet from the source of activity.

Table 16: Typical Construction Equipment Vibration Levels

Equipment	Peak Particle Velocity at 25 Feet (in/sec)	Peak Particle Velocity at 40 Feet (in/sec)[1]
Large Bulldozer	0.089	0.0440
Loaded Trucks	0.076	0.0376
Jackhammer	0.035	0.0173
Small Bulldozer/Tractors	0.003	0.0015

[1] *Calculated using the following formula:* $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$

where: PPV_{equip} *= the peak particle velocity in in/sec of the equipment adjusted for the distance*

PPV_{ref} *= the reference vibration level in in/sec from Table 7-4 of the Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.*

D = the distance from the equipment to the receiver

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018.

The nearest building is the existing school building located approximately 40 feet to the east of the active construction zone. Using the calculation shown in **Table 16**, at 40 feet the vibration velocities from construction equipment would not exceed 0.044 in/sec PPV, which is below the FTA's 0.20 PPV threshold for non-engineered timber and masonry buildings. It is also acknowledged that construction activities would occur throughout the Project site and would not be concentrated at the point closest to the nearest residential structure. Therefore, vibration impacts associated with the proposed Project would be less than significant.

Source(s): Riverside County General Plan, Table N-1 ("Land Use Compatibility for Community Noise Exposure"), Project Application Materials

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
PALEONTOLOGICAL RESOURCES:				
28. Paleontological Resources				
a) Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?	☐	☒	☐	☐

Less than Significant with Mitigation. The proposed Project would not require any heavy construction activities. Grading would occur on 0.68 acres of the total 12.19 acres school site and the approximate depth of excavation would be 2' feet.

Although the entirety of the project site has been subject to ground disturbance, the site is identified as having a high paleontological sensitivity (High B).[22] This is considered equivalent to (High A) but is based on the occurrence of fossils at a specified depth below the surface. The category (High B) indicates that fossils are likely to be encountered at or below four feet of depth and may be impacted during excavation by construction activities.

Although the project site is identified as having a high paleontological sensitivity potential, the project excavation activities would occur on the top 2' feet of the soil; additionally, the project site has been previously graded at the greater depth. As such, the chances of finding paleontological resources is low. Nevertheless, the following mitigation measures would apply:

Mitigation Measures:

GEO-1: A qualified paleontologist shall monitor the project site during ground disturbance.

GEO-2: If any fossils are found on the project site, ground disturbance will cease in the area of the finding until the fossils are removed from the site and deposited in a public museum or other approved curation facility.

With implementation of Mitigation Measures GEO-1 and GEO-2, a less than significant impact would occur.

Source(s): Riverside County General Plan Figure OS-8 "Paleontological Sensitivity," Paleontological Resource Impact Mitigation Program ("PRIMP") Report

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

POPULATION AND HOUSING Would the project:				
29. Housing				
a) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

No Impact. The project site is a fully functioning charter school facility and no residential units are located onsite. No residences would be displaced from project implementation. No impact would occur.

[22] Riverside County. 2020. *Riverside County Parcel Report, APN 551220069*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?	☐	☐	☒	☐

Less than Significant. The proposed project includes the installation of three modular buildings within the existing charter school and associated improvements. The project does not propose any type of residential development. Project implementation would meet the demands of projected population growth in the area by providing future accommodation for students. Project related construction would be a source of short-term employment, but it is anticipated that construction workers would be sourced from within or surrounding communities. Long-term employment for teachers and school staff is not anticipated to create significant population growth. The Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) regional employment by industry sector forecast, forecasted that educational services will decrease from 8.9 percent in 2015 to 8.8 percent by 2040.[23] It is anticipated that the project would create approximately 5 new educational employment opportunities for staff living in the community or County. The creation of the new jobs will help offset the educational jobs trends. It is not anticipated that the proposed Project will induce substantial population growth in the area. A less than significant impact would occur.

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)?	☐	☐	☐	☒

No impact. The proposed project does not propose new homes or new businesses, nor does it include the extension of roads or other major infrastructure. No impact would occur.

Source(s): Project Application Materials, GIS database, Riverside County General Plan Housing Element

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

30. Fire Services	☐	☐	☒	☐

Less than Significant. The Riverside County Fire Department (RCFD) provides fire protection services to the County, inclusive of the project site. The closest fire stations to the project site are Station #26 at 25954 Stanford Street , located approximately one mile west of the project site and Station #72 located at 25175 Fairview Avenue, approximately 2.3 miles northeast of the project site. The project's pre-fabricated buildings will meet the current CBC requirements and the project is subject to fire suppression development impact fees and other standards and conditions required by the City and County Fire. Additionally, fire protection ingress and egress will be available via driveways 1 and 2.

Fire hydrants are located just east and north of the proposed modular building locations; two fire hydrants are located next to the proposed modular buildings to the east, two additional fire hydrants are located just

[23] SCAG. 2015. *RTP/SCS 2016-2040.* Available at http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx, accessed on October 2020.

northwest and west of building "A"; and two fire hydrants located adjacently to the east and south of building "B." Furthermore, the project site's internal circulation currently allows County Fire approved access.

Additionally, the project would pay the applicable fire impact fees. Impacts on fire services is anticipated to be less than significant. Impacts on fire services is anticipated to be less than significant.

Source(s): Riverside County General Plan Safety Element

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

31. Sheriff Services	☐	☐	☒	☐

Less than Significant. Policing protection services would be provided by the Riverside County Sheriff's Department (RCSD). The RCSD has a staff of over 3,600 law enforcement professionals. The closest police station is located 43950 Acacia Avenue, Suite B, approximately 1.8 miles east of the project site. The project site is a former church and an existing school previously permitted but was not fully constructed as proposed. The project is in an urbanized area and would be required to adhere to all standards and conditions required by the County and RCSD.

While the project could increase the need for police protection due to the increase of students, the increase would be negligible, as the site was previously proposed, and it would not require the construction of new facilities to maintain acceptable service ratios, response times, or other performance objectives. With adherence to conditions and standards identified by the County's General Plan and the RCSD, and payment of impact fees, the project would result in a less than significant impact on policing protection.

Source(s): Riverside County General Plan

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

32. Schools	☐	☐	☐	☒

No Impact. The proposed Project would not impact public schools. The impact of providing additional students on the existing charter school facility on this site is addressed throughout this initial study. A net increase in school facilities would consequently occur with the implementation of the proposed project. Additionally, the project would be subject to the applicable school impact fees. No impacts would occur.

Source(s): School District correspondence, GIS database

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
33. Libraries	☐	☐	☐	☒

No impact. The addition of the modular buildings, including students and staff to the existing school would not require additional public library resources because the school provides its own library facilities for students and staff. No impact to public libraries would occur.

Source(s): Riverside County General Plan

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

34. Health Services	☐	☐	☐	☒

No Impact. The proposed project would not result in or induce significant population growth because the proposed project does not propose residential units that could introduce new population in the area that could require public health services; rather, the project is proposing three modular classrooms within an existing educational charter facility to provide services to new students from within and neighboring cities; therefore, no impacts to public health services would occur from Project implementation.

Source(s): Riverside County General Plan

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

RECREATION Would the project:				
35. Parks and Recreation				
a) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒
b) Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				

No Impact. The proposed project does not involve aspects that would induce population growth that would require the use of existing neighborhood and regional parks, nor would the project require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

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

No impact. The project site is not located within a CSA or recreation or park district with a Community Parks and Recreation Plan. The proposed project would not induce impacts in this regard. No impact would occur.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Source(s): IS database, Ord. No. 460, Section 10.35 (Regulating the Division of Land – Park and Recreation Fees and Dedications), Ord. No. 659 (Establishing Development Impact Fees), Parks & Open Space Department Review

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

36. Recreational Trails

a) Include the construction or expansion of a trail system?	☐	☐	☐	☒

No impact. The project does not include the construction or expansion of trails within or around the project site. The nearest community trail is located approximately 0.5 miles south of the project site. However, no portion of this trail would be affected. As such, the proposed project would not include the construction or expansion of a trail system.

Source(s): Riverside County General Plan Figure C-6 Trails and Bikeway System

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

TRANSPORTATION Would the project:

A Traffic Impact Study (November 2020) have been prepared by Kimley-Horn. The report is available as Appendix E to this IS/MND and is used to answer the following CEQA Thresholds.

ANALYSIS SCENARIOS AND METHODOLOGY

Analysis Scenarios

In accordance with the Riverside County Traffic Impact Analysis Preparation Guide, the project will be evaluated in the morning and afternoon peak hours for the following conditions:

- Existing Conditions
- Existing Plus Project Conditions
- Opening Year 2026
- Opening Year 2026 Plus Project
- Opening Year 2026 Plus Project Plus Cumulative Projects

Study Locations

The study locations were established in consultation with County staff through the Scoping Agreement process (Scope of Study Form of the Riverside County *Traffic Impact Analysis Preparation Guide).* A copy of the approved Scope of Study Form is provided in *Appendix A* of the Traffic Impact Analysis, provided as Appendix E of this Initial Study.

Study Intersections:

1. Main Street-Lake Park Drive at Ramona Expressway (City of San Jacinto)
2. Esplanade Avenue at Ramona Expressway (City of San Jacinto)
3. Hemet Street at Ramona Expressway (City of Hemet)
4. Florida Avenue at Santa Fe Street (County/City of Hemet)
5. Florida Avenue at San Jacinto Street (County/City of Hemet)
6. Florida Avenue at Girard Street (County/City of Hemet)
7. Florida Avenue at Columbia Street (County/City of Hemet)
8. Florida Avenue at Stanford Street (County/City of Hemet)
9. Florida Avenue at Meridian Street (County/City of Hemet)
10. Florida Avenue at Hemet Street (County/City of Hemet)
11. Florida Avenue at Soboba Street (County/City of Hemet)
12. Acacia Avenue at Soboba Street (County)

Existing lane configurations and traffic control at the study intersections are shown on **Exhibit 4**, *Existing Lane Configuration and Traffic Control.*

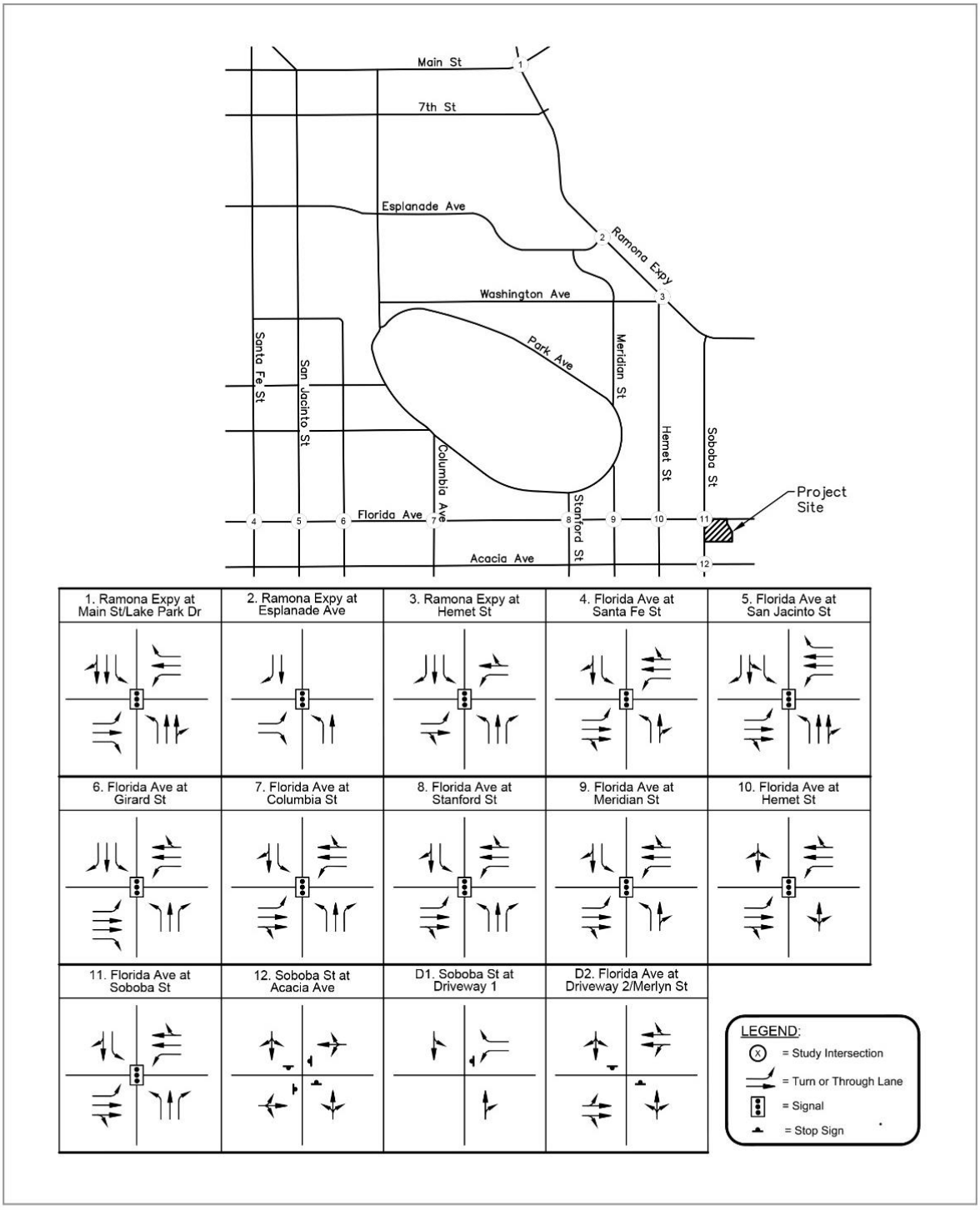


EXHIBIT 4: Existing Lane Configuration and Traffic Control
Hemet Imagine
City of Hemet

Not to scale

Kimley»Horn

Intersection Analysis – HCM Methodology

Peak hour intersection operations are evaluated using the methodology outlined in the Highway Capacity Manual (HCM 6th Edition) consistent with the requirements of the County of Riverside. The intersection analysis was conducted using the Vistro software program and using the specified input parameters required by the County.

Per the HCM Methodology, Level of Service (LOS) for signalized intersections is defined in terms of average control delay per vehicle during the peak hours. The average control delay includes initial deceleration delay, queue move-up time, and final acceleration time in addition to the stop delay. **Table 18** provides a description of the operating characteristics of each Level of Service and average seconds of delay for signalized and unsignalized intersections.

Table 17: Level of Service Definitions

Level of Service	Description
A	No approach phase is fully utilized by traffic and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turns are made easily and nearly all drivers find freedom of operation.
B	This service level represents stable operation, where an occasional approach phase is fully utilized and a substantial number are approaching full use. Many drivers begin to feel restricted within platoons of vehicles.
C	This level still represents stable operating conditions. Occasionally drivers may have to wait through more than one red signal indication, and backups may develop behind turning vehicles. Most drivers feel somewhat restricted but not objectionably so.
D	This level encompasses a zone of increasing restriction, approaching instability at the intersection. Delays to approaching vehicles may be substantial during short peaks within the peak period; however, enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive backups.
E	Capacity occurs at the upper end of this service level. It represents the most vehicles that any particular intersection approach can accommodate. Full utilization of every signal cycle is seldom attained no matter how great the demand.
F	This level describes forced flow operations at low speeds, where volumes exceed capacity. These conditions usually result from queues of vehicles backing up from a restriction downstream. Speeds are reduced substantially, and stoppages may occur for short or long periods of time due to the congestion. In the extreme case, both speed and volume can drop to zero.

Table 18: Level of Service Criteria For Signalized and Unsignalized Intersections

Level of Service	Signalized Intersection (Average delay per vehicle, in seconds) [1]	Unsignalized Intersections (Average delay per vehicle, in seconds) [2]
A	≤ 10	0 – 10
B	> 10 – 20	> 10 – 15
C	> 20 – 35	> 15 – 25
D	> 35 – 55	> 25 – 35
E	> 55 – 80	> 35 – 50
F	> 80	> 50

Source:
[1] Highway Capacity Manual (HCM 6th Edition), Exhibit 18-4.
[2] Highway Capacity Manual (HCM 6th Edition), Exhibits 19-1 and 20-2

Performance Criteria

City of Hemet
The City of Hemet has established that Level of Service "D" is considered acceptable during the peak hours.

City of San Jacinto
The City of San Jacinto has established that Level of Service "D" is considered acceptable during the peak hours.

County of Riverside
The County of Riverside General Plan has established that Level of Service "D" is considered acceptable during the peak hours.

Significance Thresholds
A project-related traffic effect would be considered to be significant when the project traffic, when added to existing traffic, causes the Level of Service to deteriorate to below the target Level of Service, and effects cannot be mitigated through project conditions of approval. A cumulative impact would occur when cumulative traffic (existing plus ambient growth plus Cumulative Projects plus project traffic) exceeds the target Level of Service, and impacts cannot be mitigated through the Transportation Uniform Mitigation Fee (TUMF) network, project conditions of approval, or other implementation mechanisms.

EXISTING CONDITIONS

Existing Roadway System
Regional access to the site is provided primarily by the State Route 74 (SR-74)/Florida Avenue, located just north of the project site. In addition, State Route 79 (SR-79) I-10 Freeway is located approximately 2 miles west of the site. The following provides a description of the roadways surrounding the project site.

Florida Avenue (SR-74) is an east-west divided roadway that provides two lanes in each direction. The posted speed limit is 50 miles per hour (mph) and on-street parking is prohibited on both sides. In the City of Hemet General Plan Circulation Element, Florida Avenue is designated as an Arterial 6D west of Cawston Avenue, a Major 4D-6D between Cawston Avenue and Gilbert Street, and a Divided Secondary-A 4D, east of Gilbert Street. Florida Avenue would provide access to the project site via a right-in-right-out only driveway.

Soboba Street is a north-south undivided roadway that provides one lane in each direction. The posted speed limit is 35 mph north of Florida Avenue and 40 mph south of Florida Avenue. and on-street parking is prohibited on both sides. Soboba Street is classified as a Collector 2U north of Florida Avenue in the City of

Hemet Circulation Element. Soboba Street would provide access to the project site via a full-movement driveway.

Main Street is an east-west divided roadway with one lane in each direction. The posted speed limit is 40 mph and on-street parking is permitted on both sides. Main Street is designated as a Secondary roadway local street in the City of San Jacinto General Plan Circulation Element.

Esplanade Avenue is an east-west roadway that provides two lanes in each direction. The posted speed limit is 45 mph and on-street parking is prohibited on both sides. Esplanade Avenue is designated as a major roadway in the City of San Jacinto Circulation Element.

Santa Fe Street is a north-south undivided roadway that provides one lane in each direction. The posted speed limit is 25 mph and parking is permitted on both sides. Santa Fe Street is classified as a Collector 2U in the City of Hemet Circulation Element.

San Jacinto Street (SR-79) is a north-south divided roadway that provides two lanes in each direction north of Florida Avenue, and undivided roadway with one lane in each direction south of Florida Avenue. The posted speed limit is 40 mph north and on-street parking is prohibited north of Florida Avenue. South of Florida Avenue, the posted speed limit is 30 mph and on-street parking is permitted. San Jacinto Street is designated as a major roadway in the City of San Jacinto Circulation Element, and as a Secondary 4U in the City of Hemet Circulation Element.

Girard Street is a north-south undivided roadway with one lane in each direction. The posted speed limit is 30 mph and on-street parking is permitted on both sides. Girard Street is designated as a Collector 2U street in the City of Hemet Circulation Element.

Columbia Avenue is a north-south undivided roadway that provides one lane in each direction. The posted speed limit is 35 mph and on-street parking is permitted on both sides. Columbia Avenue is designated as a Secondary 4U north of Stetson Avenue and a Collector 2U south of Stenson Avenue, in the City of Hemet Circulation Element.

Stanford Street is a north-south roadway that provides one lane in each direction north of Acacia Avenue, and two lanes in each direction south of Acacia Avenue. The posted speed limit is 40 mph and on-street parking is permitted along some segments of Stanford Street. Stanford Street is designated as a Secondary 4U north of Stetson Avenue and a Collector 2U south of Stenson Avenue, in the City of Hemet Circulation Element.

Meridian Street is a north-south undivided roadway that provides one lane in each direction. The posted speed limit is 35 mph in the project vicinity and on-street parking is permitted on both sides. Meridian Street is designated as a Collector 2U in the City of Hemet Circulation Element.

Hemet Street is a north-south undivided roadway that provides one lane in each direction. The posted speed limit is 35 mph in the project vicinity and on-street parking is permitted on both sides. Meridian Street is designated as a Collector 2U in the City of Hemet Circulation Element.

Acacia Avenue is an east-west undivided roadway that provides one lane in each direction. The posted speed limit is 30 mph in the project vicinity and on-street parking is permitted on both sides. Meridian Street is designated as a Collector 2U within the project area, in the City of Hemet Circulation Element.

Existing Transit Service

Transit service to the project area is provided by Riverside Transit Agency (RTA), which serves the City of Hemet and surrounding cities. The RTA bus stops closest to the project site are located at the northwest and southeast corners of the intersection of Soboba Street at Florida Avenue.

Descriptions of the bus routes serving the project area are provided below.

RTA Route 28 operates between the City of Perris and the City of Hemet, traveling along Florida Avenue in the project vicinity. Route 28 operates on weekdays and weekends from approximately 4:30 AM to 12:05 AM, with approximately 45-minute headways (the time between bus arrivals).

RTA Route 32 operates between the City of San Jacinto and the City of Hemet, traveling through along Main Street, Esplanade Avenue, and San Jacinto Street in the project vicinity. Route 32 operates on weekdays and weekends from approximately 7:15 AM to 6:50 PM with approximately 1-hour headways.

RTA Route 33 operates within the City of Hemet, traveling along Stanford Street, Florida Avenue, and San Jacinto Street in the project vicinity. Route 33 operates on weekdays and weekends from approximately 8:10 AM to 6:50 PM with approximately 45-to 90-minute headways.

Existing Traffic Volumes

Existing morning and afternoon peak hour turning movement traffic volumes at the study intersections were collected on March 3, 2020, prior to the shutdown of schools and businesses amid the COVID-19 pandemic. Existing peak hour volumes at the study intersections are shown on **Exhibit 4**, *Existing Lane Configuration and Traffic Control*. Copies of the traffic count data worksheets are provided in *Appendix B* of the Traffic Impact Analysis, provided as Appendix E of this Initial Study.

Existing Operating Conditions

Peak Hour Operating Conditions

Intersection Level of Service analysis was conducted for the morning and afternoon peak hours using the analysis procedures and assumptions described previously in this report. The results are shown on **Table 19,** *Summary of Intersection Operation – Existing Conditions*.

Table 19: Summary of Intersection Operation – Existing Conditions

Int. #	Intersection	Traffic	AM Peak Hour		PM Peak Hour	
		Control	Delay	LOS	Delay	LOS
1	Main Street/Lake Park Drive at Ramona Expressway	S	18.7	B	24.1	C
2	Esplanade Avenue at Ramona Expressway	S	22.0	C	17.7	B
3	Hemet Street at Ramona Expressway	S	17.2	B	13.3	B
4	Florida Avenue at Santa Fe Street	S	15.9	B	14.5	B
5	Florida Avenue at San Jacinto Street	S	37.8	D	41.9	D
Int. #	**Intersection**	**Traffic**	**AM Peak Hour**		**PM Peak Hour**	
		Control	**Delay**	**LOS**	**Delay**	**LOS**
6	Florida Avenue at Girard Street	S	22.9	C	23.1	C
7	Florida Avenue at Columbia Street	S	17.2	B	14.5	B

8	Florida Avenue at Stanford Street	S	26.0	C	30.0	C
9	Florida Avenue at Meridian Street	S	13.9	B	11.2	B
10	Florida Avenue at Hemet Street	S	22.1	C	18.4	B
11	Florida Avenue at Soboba Street	S	28.5	C	25.5	C
12	Acacia Avenue at Soboba Street	U	12.7	B	10.6	B

Notes:
- **Bold** values indicate intersections operating at an unacceptable Level of Service
- Intersection operation is expressed in volume-to-capacity (v/c) ratio for signalized intersections, and average delay for unsignalized intersections.
- Delay values for unsignalized intersections represent the average vehicle delay on the worst (highest delay) intersection approach.

Review of Table 19 indicates that all study intersections currently operate at an acceptable Level of Service. Copies of the intersection analysis worksheets are provided in Appendix C of the TIA, provided as Appendix E of this Initial Study.

PROJECT TRAFFIC

A trip generation comparison memorandum (June 2019), which was prepared for the County of Riverside, compared the trip generating characteristics of the proposed Hemet Imagine School project, which assumed 190 students, to the former Hemet Church of the Nazarene. The trip generation memorandum was approved by the County of Riverside. The existing Imagine Charter School Hemet currently has 149 students enrolled. The proposed project involves the expansion of the existing charter school up to 900 enrolled students. Below is a summary of the net trip difference between the existing charter school and the proposed build-out of the charter school.

Existing Project Trips

Bus Transportation

The school currently occupies one passenger bus with an estimated total of 50 students during morning drop-off and afternoon pick-up times.

Passenger Car Transportation

a. Students

The remaining 99 students arrive by passenger car. Based on the Coachella campus experience, the average vehicle occupancy is approximately 1.8 students per vehicle. This would result in approximately 55 passenger vehicle trips to and from the school during the morning drop-off times; **Exhibit 5,** *Existing Traffic Volumes.*

It should be noted that the school provides a before school and after school program. As the afternoon pick-up times may be more staggered due to the after-school program, trip rates for the PM peak hour of the generator from the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition) for Charter Elementary School (ITE Code 537) were applied for the afternoon peak hour.

a. Staff Members

Sixteen staff members (teachers, aides, and administrative staff) are each assumed, conservatively, to arrive and depart the campus in single-occupant vehicles.

A summary of the trips associated with the existing school, based on these traffic operations assumptions, is provided on Table 18. The existing school is estimated to currently generate 220 daily trips with 128 trips in the morning peak hour and 87 trips in the afternoon peak hour.

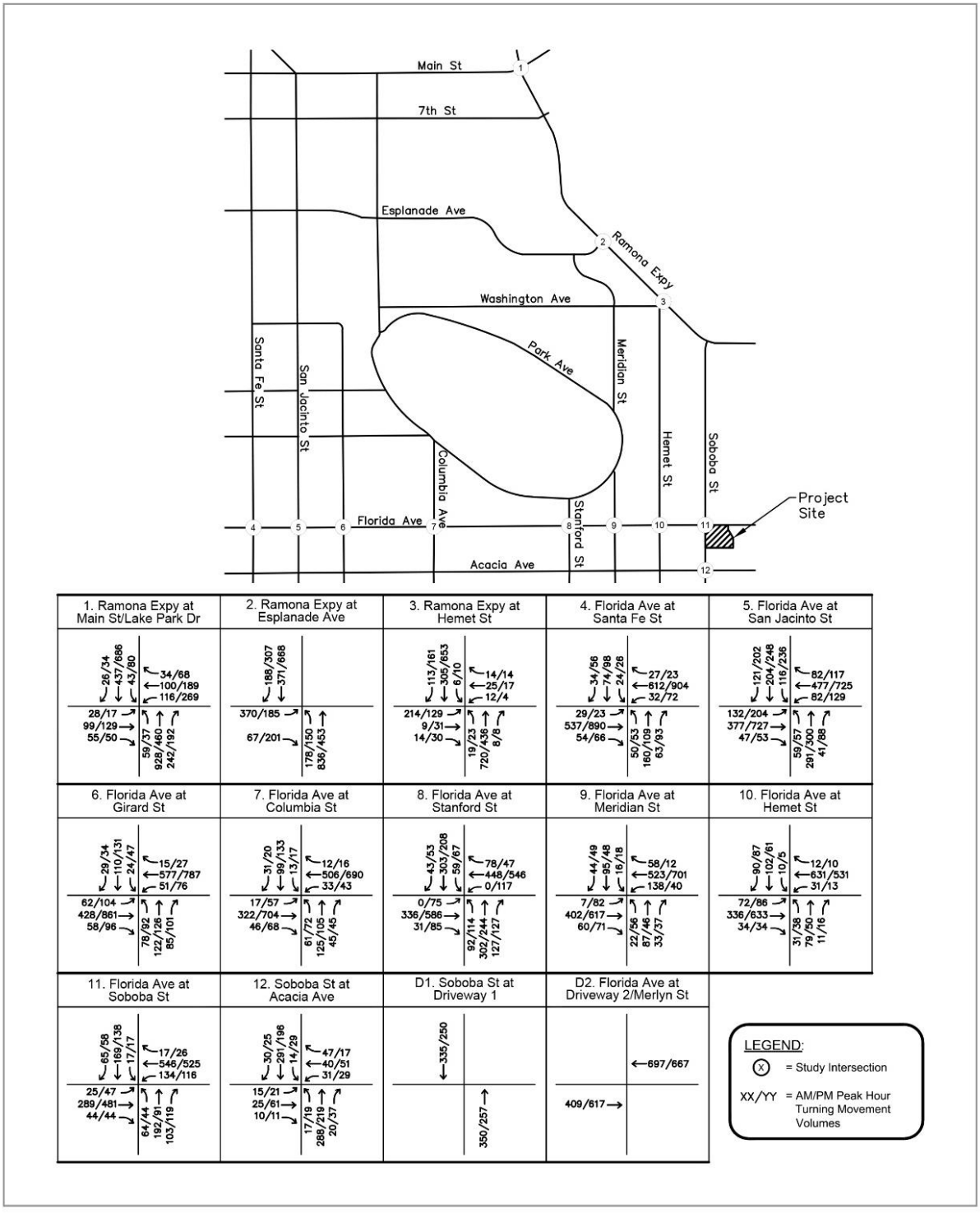


EXHIBIT 5: Existing Traffic Volumes
Hemet Imagine
City of Hemet

Not to scale

Kimley»Horn

Proposed Project Trips
The applicant has provided a Traffic Operations Plan for the proposed build-out of the project. The Plan includes the following assumptions.

Bus Transportation
Students are eligible for free transportation. Parents can petition for free bus transportation services by filling out a form. A sample transportation request form is provided in Appendix A of the TIA, included as Appendix E of the IS/MND.

It is anticipated that 3 additional buses with an estimated total of 150 additional students would be needed during morning drop-off and mid-afternoon pick-up times. To design the most efficient bus routes, upon enrollment selection, bussed students are identified by residential location. From there, centralized pick-up locations are identified at concentrated pick-up areas.

Passenger Car Transportation

a. Students

The remaining additional 601 students would arrive by passenger car. Using an average vehicle occupancy of approximately 1.8 students per vehicle, this would result in approximately 334 passenger vehicle trips to and from the school during the morning drop-off. As the afternoon pick-up times may be more staggered due to the after-school program, trip rates for the PM peak hour of the generator from the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition) for Charter Elementary School (ITE Code 537) were applied for the afternoon peak hour. In addition, no trips have been assigned related to students who walk or are walked to school; however, given the close proximity to various residential subdivisions, a small percentage is expected.

b. Staff Members

Eighty-one additional staff members (teachers, aides, and administrative staff) are each assumed, conservatively, to arrive and depart the campus in single-occupant vehicles.

A summary of the trips associated with the proposed additional 751 students, based on the traffic operations assumptions noted above, is provided on Table 18 (previously mentioned). The additional student enrollment for the Imagine Charter School Hemet is estimated to generate 1,286 additional daily trips with 755 additional trips in the morning peak hour and 509 additional trips in the afternoon peak hour.

Trip Generation Summary
A summary of the trips associated with the complete build-out of the Imagine Charter School Hemet (up to 900 students) is provided in **Table 20,** *Summary of Project Trip Generation*. Review of the table shows that the full build-out of Imagine Charter School Hemet would generate 1,506 total daily trips with 883 trips in the morning peak hour and 589 trips in the afternoon peak hour.

Table 20: Summary of Project Trip Generation

Land Use	ITE Code	Unit	Trip Generation Rates						
				AM Peak Hour[2]			PM Peak Hour[3]		
			Daily[1]	In	Out	Total	In	Out	Total
Charter Elementary School	537	Student	1.850	0.56	0.56	1.12	0.32	0.37	0.69
			Trip Generation Estimates						
				AM Peak Hour			PM Peak Hour		
Land Use	Quantity	Unit	Daily	In	Out	Total	In	Out	Total
Existing Total Students: 149 [4]									
Existing Students (passenger cars)	99	Student	184	55	55	110	32	37	69
Existing Buses	50	Student	4	1	1	2	1	1	2
Existing School Staff	149	Student	32	16	0	16	0	16	16
Total Existing School Trips			**220**	**72**	**56**	**128**	**33**	**54**	**87**
Total Phase II Students: 900 (751 Additional Students)[4]									
Phase I Additional Students (passenger cars)	601	Student	1,112	334	334	668	191	224	415
Phase I Additional Buses	150	Student	12	3	3	6	3	3	6
Phase I Additional School Staff	751	Student	162	81	0	81	0	81	81
Total Additional Project Trips (School-Build-Out)			**1,286**	**418**	**337**	**755**	**194**	**308**	**502**
Total Project Trips (School Build-Out)			**1,506**	**490**	**393**	**883**	**227**	**362**	**589**

[1]Source Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition.
[2]Rates are based on 1.8 students per passenger vehicle per the Trip Generation Comparison Memorandum for Proposed Imagine School at 42655 Florida Ave in the County of Riverside (June 2019).
[3]Source: Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th 'Edition. Rates are for the PM hour of generator.
[4]Assumes 1/3 of students ride the bus (50 students per bus); 16 staff per 150 students (staff will arrive in single occupant vehicles).

Trip Distribution and Assignment

Project trip distribution assumptions for the project site were developed based on the likely origins and destinations of students and employees of the project. Trip distribution assumptions for the proposed project are shown on **Exhibit 6,** *Project Trip Distribution.* Trip distribution percentages at each study intersection were applied to the project trip generation to determine the project trips through each intersection. The resulting project-related peak hour trips are shown on **Exhibit 7,** *Project Related Traffic Volumes.*

EXISTING PLUS PROJECT CONDITIONS

The Existing Plus Project analysis scenario is a hypothetical scenario that assumes completion of the project and full absorption of the project traffic on the surrounding street network at the current time, with no other changes in traffic conditions.

The project-related peak hour trips were added to the existing peak hour volumes to evaluate Existing Plus Project conditions. The resulting traffic volumes are shown on **Exhibit 8,** *Existing Plus Project Traffic Volumes.* Existing Plus Project intersection results are shown on **Table 21,** *Summary of Intersection Operation – Existing Plus Project.*

As Table 21 indicates, all study intersection would continue to operate at an acceptable Level of Service. Intersection analysis worksheets are provided in Appendix C of the TIA, provided as Appendix E of this Initial Study.

Table 21: Summary of Intersection Operation – Existing Plus Project

Int. #	Intersection	AM Peak Hour						PM Peak Hour					
		Without Project		With Project		Change in Delay	Sig Impact?	Without Project		With Project		Change in Delay	Sig Impact?
		Delay	LOS	Delay	LOS			Delay	LOS	Delay	LOS		
1	Main Street/Lake Park Drive at Ramona Expressway	18.7	B	20.2	C	1.5	No	24.1	C	24.8	C	0.7	No
2	Esplanade Avenue at Ramona Expressway	22.0	C	23.8	C	1.8	No	17.7	B	18.9	B	1.2	No
3	Hemet Street at Ramona Expressway	17.2	B	17.4	B	0.2	No	13.3	B	13.1	B	-0.2	No
4	Florida Avenue at Santa Fe Street	15.9	B	16.6	B	0.7	No	14.5	B	14.7	B	0.2	No
5	Florida Avenue at San Jacinto Street	37.8	D	37.5	D	-0.3	No	14.9	D	43.7	D	1.8	No
6	Florida Avenue at Girard Street	22.9	C	21.2	C	-1.7	No	23.1	C	22.7	C	-0.4	No
7	Florida Avenue at Columbia Street	17.2	B	16.1	B	-1.1	No	14.5	B	14.3	B	-0.2	No
8	Florida Avenue at Stanford Street	26.0	D	25.7	C	-0.3	No	30.0	D	29.9	C	-0.1	No
9	Florida Avenue at Meridian Street	13.9	B	12.6	B	-1.4	No	11.2	B	10.7	B	-0.5	No
10	Florida Avenue at Hemet Street	22.1	C	19.5	B	-26	No	18.4	C	17.1	B	-1.3	No
11	Florida Avenue at Soboba Street	28.5	C	41.9	DF	13.4	No	25.5	D	36.4	D	10.9	No
12	Acacia Avenue at Soboba Street	12.7	B	14.2	B	15.	No	10.6	B	11.2	B	0.6	No
D1	Soboba Street at Driveway 1	-	-	25.8	D	-	-	-	-	15.0	B	-	-
D2	Florida Avenue at Driveway 2	-	-	10.9	B	-	-	-	-	11.1	B	-	-

Notes:
- **Bold** values indicate intersections operating at an unacceptable Level of Service
- Intersection operation is expressed in volume-to-capacity (v/c) ratio for signalized intersections, and average delay for unsignalized intersections.
- Delay values for unsignalized intersections represent the average vehicle delay on the worst (highest delay) intersection approach.

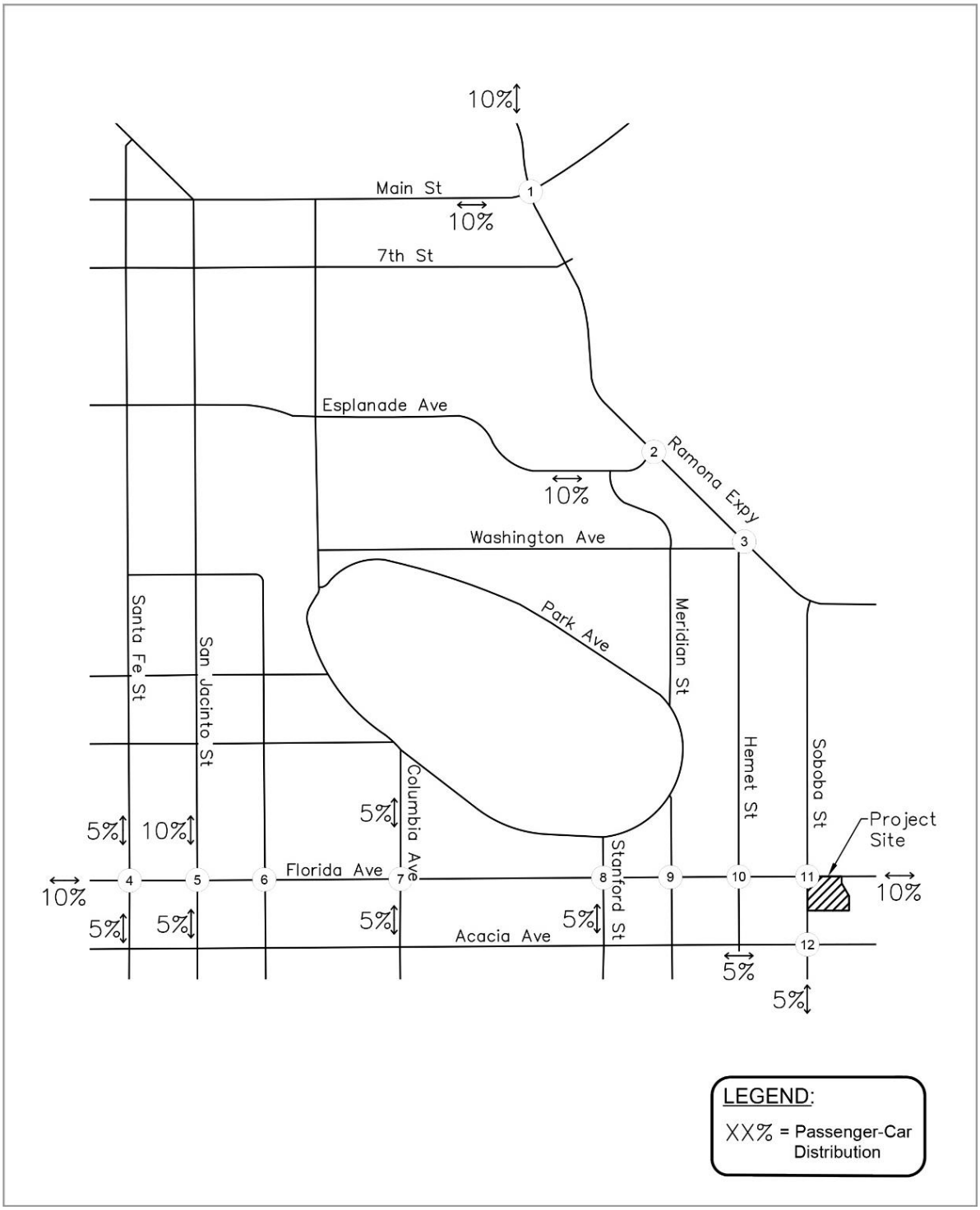


EXHIBIT 6: Project Trip Distribution
Hemet Imagine
City of Hemet

Not to scale

Kimley»Horn

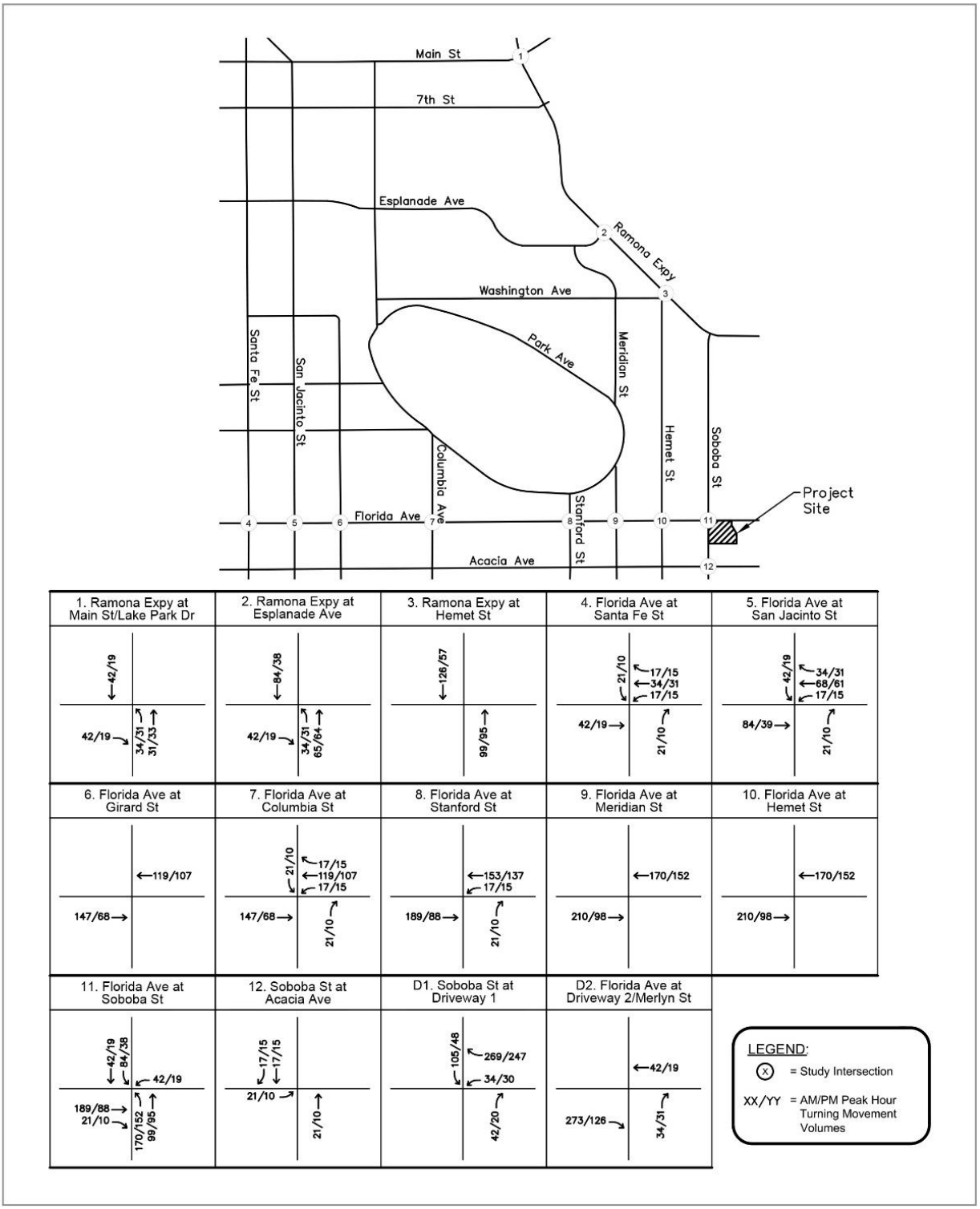


EXHIBIT 7: Project Related Traffic Volumes
Hemet Imagine
City of Hemet

Not to scale

Kimley»Horn

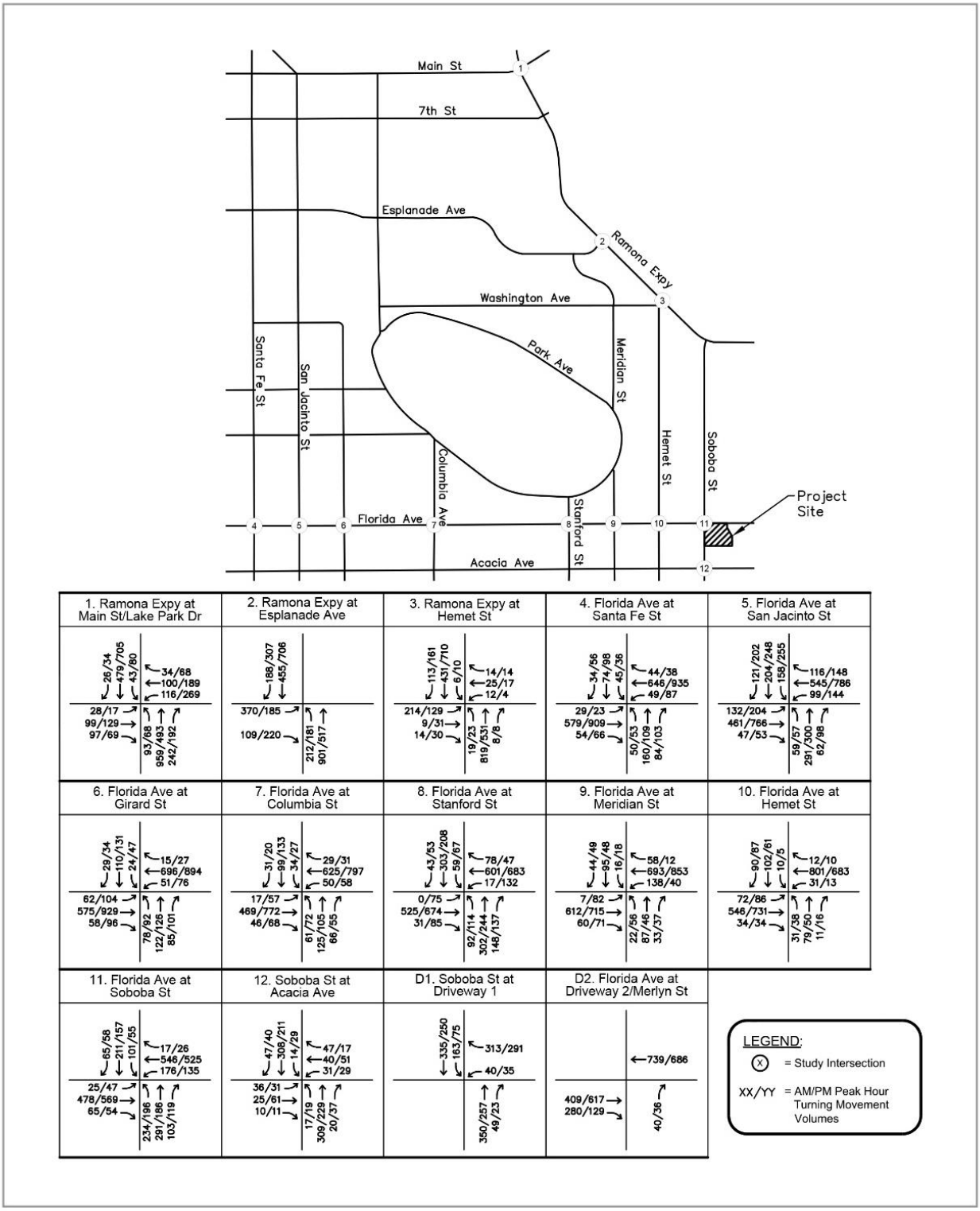


EXHIBIT 8: Existing Plus Project Traffic Volumes

Hemet Imagine

City of Hemet

Not to scale

Kimley»Horn

OPENING YEAR 2026 CONDITIONS

The project Opening Year is anticipated to be 2026. Opening Year 2026 traffic forecasts have been developed by adding an ambient growth factor of 2.0 percent per year to existing traffic volumes at the study intersections.

Opening Year 2026 without Project Conditions

The ambient growth was applied to the existing peak hour volumes to develop Year 2026 without Project traffic forecasts. The resulting traffic volumes are shown on **Exhibit 9**, *Opening Year 2026 Traffic Volumes*.

The results of the Year 2026 without Project intersection analysis are summarized on **Table 22**, *Summary of Intersection Operation – Opening Year 2026 Conditions*.

Table 22: Summary of Intersection Operation – Opening Year 2026 Conditions

Int. #	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Main Street/Lake Park Drive at Ramona Expressway	S	20.4	C	25.7	C
2	Esplanade Avenue at Ramona Expressway	S	26.3	C	19.1	B
3	Hemet Street at Ramona Expressway	S	19.0	B	14.3	B
4	Florida Avenue at Santa Fe Street	S	16.7	B	15.5	B
5	Florida at San Jacinto Street	S	38.8	D	47.2	D
6	Florida Avenue at Girard Street	S	23.4	C	24.3	C
7	Florida Avenue at Columbia Street	S	17.5	B	15.1	B
8	Florida Avenue at Stanford Street	S	26.2	C	31.3	C
9	Florida Avenue at Meridian Street	S	14.3	B	11.8	B
10	Florida Avenue at Hemet Street	S	22.8	C	19.0	B
11	Florida Avenue at Soboba Street	S	29.1	C	26.1	C
12	Acacia Avenue at Soboba Street	U	14.9	B	11.7	B

Note:
- **Bold** values indicate intersections operating at an unacceptable Level of Service
- Intersection operation is expressed in volume-to-capacity (v/c) ratio for signalized intersections, and average delay for unsignalized intersections.

Review of Table 22 shows that, with the addition of ambient growth, all study intersection would continue to operate at an acceptable Level of Service.

Opening Year 2026 Plus Project Conditions

Project-related traffic volumes for the Project were added to the Year 2026 forecasts to develop Year 2026 Plus Project traffic forecast volumes. The resulting traffic volumes are shown on **Exhibit 10**, *Opening Year 2026 with Project Traffic Volumes.*

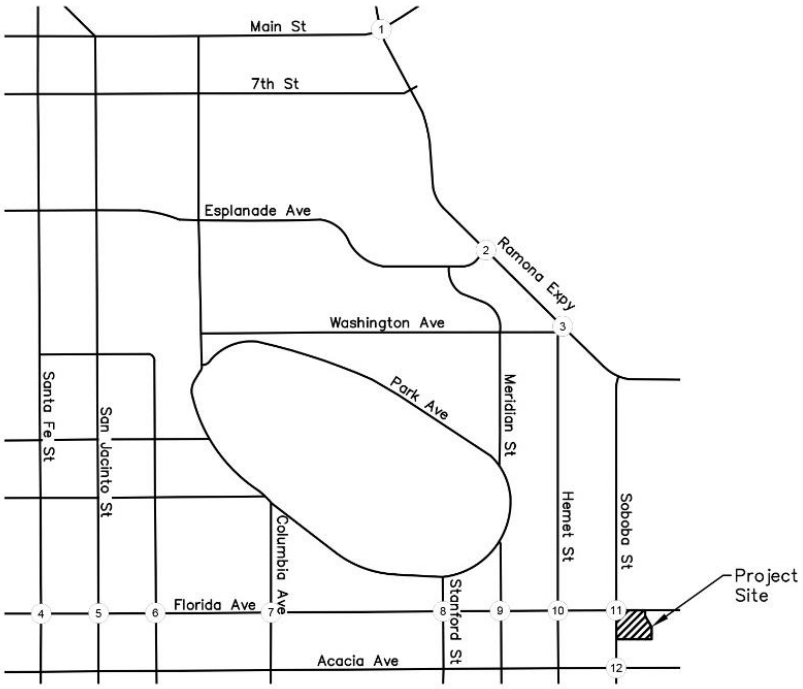
The results of the Year 2026 with Project intersection analysis are shown on **Table 23**, *Summary of Intersection Operation – Opening Year 2026 with Project Conditions*.

Review of Table 23 indicates that, with the addition of project traffic, all study intersection would continue to operate at an acceptable Level of Service. The Project would not cause any additional intersections to worsen to an unacceptable Level of Service.

Table 23: Summary of Intersection Operation – Opening Year 2026 with Project Conditions

Int. #	Intersection	AM Peak Hour						PM Peak Hour					
		Without Project		With Project		Change in Delay	Sig Impact?	Without Project		With Project		Change in Delay	Sig Impact?
		Delay	LOS	Delay	LOS			Delay	LOS	Delay	LOS		
1	Main Street/Lake Park Drive at Ramona Expressway	20.4	C	21.8	C	1.4	No	25.7	C	26.5	C	0.8	No
2	Esplanade Avenue at Ramona Expressway	26.3	C	30.3	C	4.0	No	19.1	B	21.0	C	1.9	No
3	Hemet Street at Ramona Expressway	19.0	B	20.1	C	1.1	No	14.3	B	14.4	B	0.1	No
4	Florida Avenue at Santa Fe Street	16.7	B	17.1	B	0.4	No	15.5	B	16.0	B	0.5	No
5	Florida Avenue at San Jacinto Street	38.8	D	38.7	D	-0.1	No	47.2	D	47.9	D	0.7	No
6	Florida Avenue at Girard Street	23.4	C	22.0	C	-1.4	No	24.3	C	24.2	C	-0.1	No
7	Florida Avenue at Columbia Street	17.5	B	16.5	B	-1.0	No	15.1	B	15.1	B	0.0	No
8	Florida Avenue at Stanford Street	26.2	D	26.5	C	0.3	No	31.3	D	31.4	C	0.1	No
9	Florida Avenue at Meridian Street	14.3	B	13.1	B	-1.2	No	11.8	B	11.4	B	-0.4	No
10	Florida Avenue at Hemet Street	22.8	C	20.7	C	-2.1	No	19.0	C	18.0	B	-1.0	No
11	Florida Avenue at Soboba Street	29.1	D	52.7	D	23.6	No	26.1	D	33.5	C	7.4	No
12	Acacia Avenue at Soboba Street	14.9	B	17.5	C	2.6	No	11.7	B	12.4	B	0.7	No
D1	Soboba Street at Driveway 1	-	-	29.4	D	-	-	-	-	16.0	C	-	-
D2	Florida Avenue at Driveway 2	-	-	11.1	B	-	-	-	-	11.5	B	-	-

Notes:
- **Bold** values indicate intersections operating at an unacceptable Level of Service
- Intersection operation is expressed in volume-to-capacity (v/c) ratio for signalized intersections, and average delay for unsignalized intersections.
- Delay values for unsignalized intersections represent the average vehicle delay on the worst (highest delay) intersection approach.



1. Ramona Expy at Main St/Lake Park Dr	2. Ramona Expy at Esplanade Ave	3. Ramona Expy at Hemet St	4. Florida Ave at Santa Fe St	5. Florida Ave at San Jacinto St
29/38 ← 489/768 ← 48/90 38/76 ← 112/212 ← 130/301 31/19 → 111/144 → 62/56 66/41 ↑ 1039/515 ↑ 271/215	211/344 ← 416/748 414/207 → 75/225 → 199/168 ↑ 936/507 ↑	127/180 ← 342/731 ← 7/11 16/16 ← 28/19 ← 13/4 240/144 → 10/35 → 16/34 21/26 ↑ 806/488 ↑ 9/9	38/63 ← 83/110 ← 27/29 30/26 ← 685/1012 ← 36/81 32/26 → 601/997 → 60/74 56/59 ↑ 179/122 ↑ 71/104	136/226 ← 228/278 ← 130/264 92/131 ← 534/812 ← 92/144 148/228 → 422/814 → 53/59 66/64 ↑ 326/336 ↑ 46/99
6. Florida Ave at Girard St	**7. Florida Ave at Columbia St**	**8. Florida Ave at Stanford St**	**9. Florida Ave at Meridian St**	**10. Florida Ave at Hemet St**
32/38 ← 123/147 ← 27/53 17/30 ← 646/881 ← 57/85 69/116 → 479/964 → 65/108 87/103 ↑ 137/141 ↑ 95/113	35/22 ← 111/149 ← 15/19 13/18 ← 567/773 ← 37/48 19/64 → 361/788 → 52/76 68/81 ↑ 140/118 ↑ 50/50	48/59 ← 339/233 ← 66/75 87/53 ← 502/612 ← 0/131 0/84 → 376/656 → 35/95 103/128 ↑ 338/273 ↑ 142/142	49/55 ← 106/54 ← 18/20 65/13 ← 586/785 ← 155/45 8/92 → 450/691 → 67/80 25/63 ↑ 97/52 ↑ 37/41	101/97 ← 114/68 ← 11/6 13/11 ← 707/595 ← 35/15 81/96 → 376/709 → 38/38 35/43 ↑ 88/56 ↑ 12/18
11. Florida Ave at Soboba St	**12. Soboba St at Acacia Ave**	**D1. Soboba St at Driveway 1**	**D2. Florida Ave at Driveway 2/Merlyn St**	
73/65 ← 189/155 ← 19/19 19/29 ← 612/588 ← 150/130 28/53 → 324/539 → 49/49 72/49 ↑ 215/102 ↑ 115/133	34/28 ← 326/220 ← 16/32 53/19 ← 45/57 ← 35/32 17/24 → 28/68 → 11/12 19/21 ↑ 323/245 ↑ 22/41	375/280 ← 58/27 44/44 ← 6/5 392/288 ↑ 7/3 ↑	← 781/747 458/691 → 7/3 6/5 ↑	

LEGEND:

Ⓧ = Study Intersection

XX/YY = AM/PM Peak Hour Turning Movement Volumes

EXHIBIT 9: Opening Year 2026 Traffic Volumes

Hemet Imagine

City of Hemet

Not to scale

Kimley»Horn

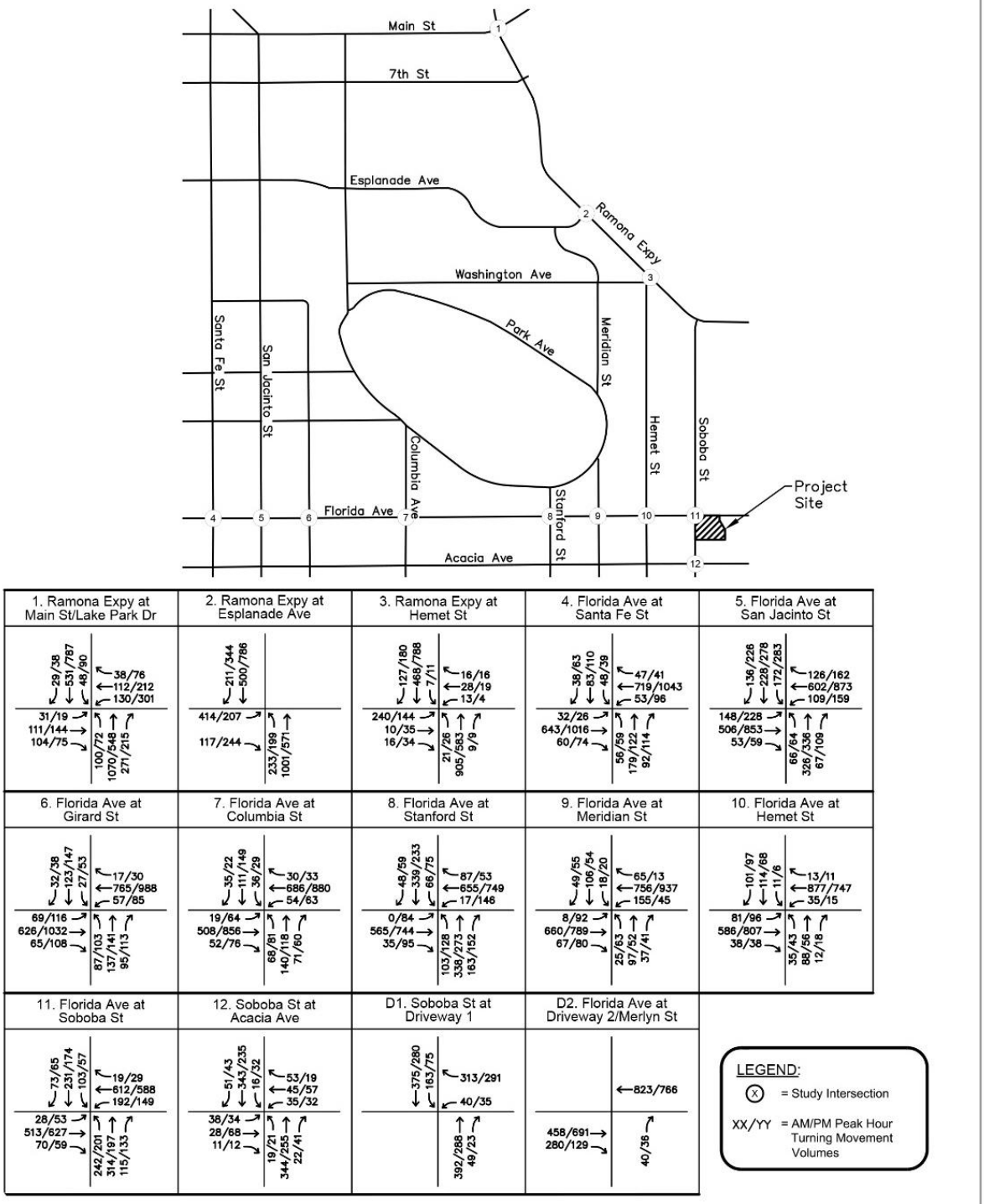


EXHIBIT 10: Opening Year 2026 with Project Traffic Volumes

Hemet Imagine

City of Hemet

Not to scale

Kimley»Horn

OPENING YEAR 2026 CUMULATIVE CONDITIONS

Cumulative Projects

In addition to ambient growth and project-related traffic, traffic from Cumulative Projects in the Project vicinity are added to the Opening Year forecasts to develop Opening Year 2026 Cumulative Conditions forecasts. Cumulative Projects consist of any project that has been approved and is not yet occupied, and projects that are in various stages of the application and approval process but have not yet been approved.

Information regarding Cumulative Projects in the area was obtained from the Riverside County Transportation Department. A summary of the Cumulative Projects, including the associated trip generation is provided on **Table 24,** *Summary of Cumulative Projects.* The trip generation estimates for the Cumulative Projects were obtained from approved traffic studies, where available; and were developed by Kimley-Horn if approved traffic studies were not available. The locations of the Cumulative Projects are shown on **Exhibit 11,** *Location of Cumulative Projects*.

Table 24: Summary of Cumulative Projects

Proj #	Description	Land Use	Quantity	Units	Trip Generation Estimates						
					Daily	AM Peak Hour			PM Peak Hour		
						In	Out	Total	In	Out	Total
1	North Hemet Revitalization Plan (SP 11-01)	Senior Adult Housing-Detached	96	DU	410	8	15	23	18	11	29
		Assisted Living	137	Bed	356	16	10	26	14	22	36
		General Office Building	16,340	KSF	159	16	3	19	3	16	19
		Shopping Center	38,120	KSF	1,439	22	14	36	70	76	146
		Multifamily Housing (Mid-Rise)	252	DU	1,371	24	67	91	68	43	111
		Multifamily Housing (Mid-Rise)	81	DU	441	8	22	30	22	14	36
		Shopping Center	80,800	KSF	3,050	47	29	76	148	160	308
2	Nelson (SDR 06-28)	General Light Industrial	16,200	KSF	80	10	1	11	1	9	10
3	SPDR 17-17	Shopping Center	30,450	KSF	1,149	19	11	29	56	60	116
4	SPDR 16-06	Private School (K-12)	1,350	Student	3,348	659	421	1,080	99	131	230
5	TR32 153	Single-Family Detached Housing	44	DU	415	8	24	32	27	16	43
6	SPDR 17-11	Shopping Center	49,000	KSF	1,850	29	17	46	90	97	187
7	SPDR 17-02 Rental Center	Shopping Center	25,000	KSF	944	15	9	24	46	50	96
8	SPDR 17-04 Fast Food	Fast-Food Restaurant w/o Drive-thru	1,250	KSF	433	19	13	32	18	18	36
9	SPDR 17-03 Fast Food	Coffee/Donut Shop w/ D.T.	2,000	KSF	1,641	91	87	178	43	43	86
10	TR33644	Multifamily Housing (Mid-Rise)	62	DU	337	6	16	22	17	11	28
11	TR30659	Single-Family Detached Housing	64	DU	604	12	36	48	40	23	63
12	TR30597	Single-Family Detached Housing	116	DU	1,095	21	65	85	72	42	114
13	Scripps West (CUP 08-14)	Shopping Center	5,300	KSF	200	3	2	5	10	10	20
14	St. Deminia Center (CUP 07-16)	Shopping Center	33,480	KSF	1,264	20	12	32	61	66	127
15	VTTM 31166 Young Homes	Single-Family Detached Housing	213	DU	2,011	39	118	157	133	78	211
Total Project Trips											
DU= Dwelling Unit, KSF=1,000 square feet, FP= Fueling Position											

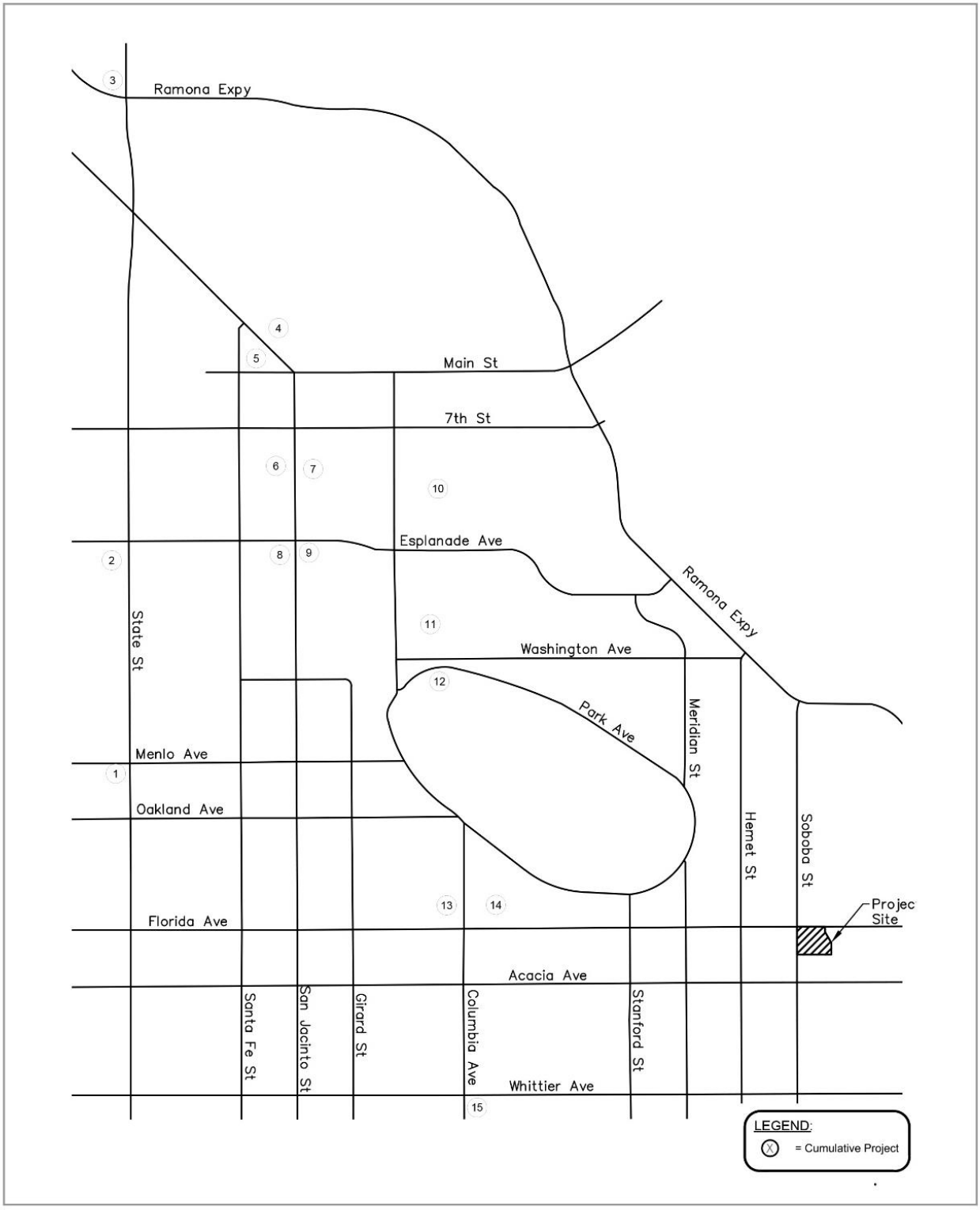


EXHIBIT 11: Location of Cumulative Projects
Hemet Imagine
City of Hemet

Not to scale

Kimley»Horn

Trip distribution and assignment for the Cumulative Projects were obtained from approved traffic studies, where available; and were developed by Kimley-Horn if approved traffic studies were not available. Traffic volumes associated with the Cumulative Projects were compiled for each of the study intersections and are shown on **Exhibit 12**, *Cumulative Projects Traffic Volumes*. The Cumulative Projects traffic volumes were added to the Opening Year 2026 with Project traffic volumes. The resulting traffic volumes for Opening Year 2026 Cumulative Conditions are shown on **Exhibit 13,** *Opening Year 2026 Cumulative Traffic Volumes.*

No planned intersection improvements are assumed to be in place for the Opening Year 2026 Cumulative Conditions analysis.

Opening Year 2026 Cumulative Operating Conditions

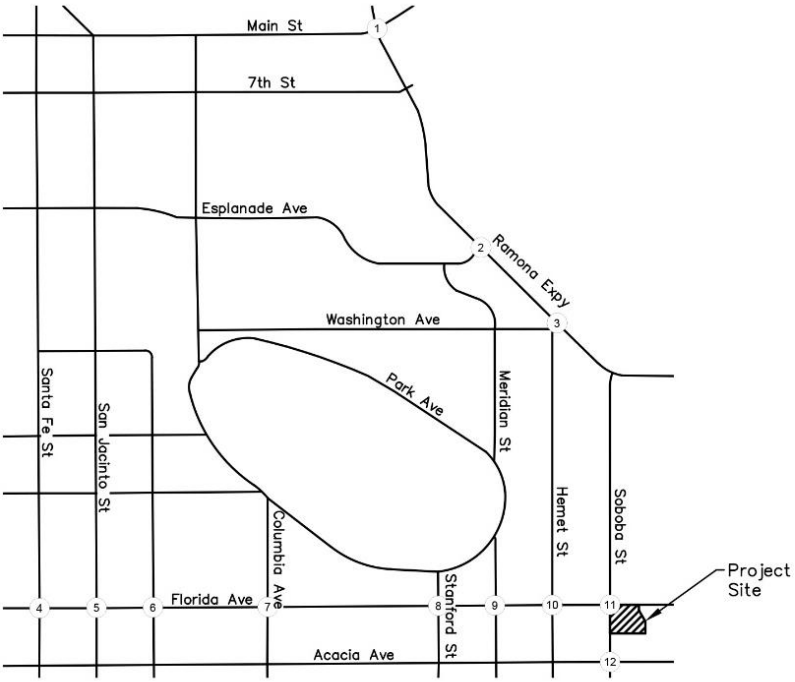
Intersection Level of Service analysis was conducted for Opening Year 2026 Cumulative Conditions, and the results are shown on **Table 25,** *Summary of Intersection Operation – Opening Year 2026 Cumulative Conditions.*

Table 25: Summary of Intersection Operation – Opening Year 2026 Cumulative Conditions

Int. #	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Main Street/Lake Park Drive at Ramona Expressway	S	25.2	C	26.7	C
2	Esplanade Avenue at Ramona Expressway	S	35.5	D	28.3	C
3	Hemet Street at Ramona Expressway	S	21.6	C	15.6	B
4	Florida Avenue at Santa Fe Street	S	17.4	B	16.9	B
5	Florida Avenue at San Jacinto Street	S	39.8	D	53.4	D
6	Florida Avenue at Girard Street	S	21.6	C	24.5	C
7	Florida Avenue at Columbia Street	S	17.6	B	17.2	B
8	Florida Avenue at Stanford Street	S	26.7	C	31.7	C
9	Florida Avenue at Meridian Street	S	13.0	B	11.3	B
10	Florida Avenue at Hemet Street	S	20.4	C	17.6	B
11	Florida Avenue at Soboba Street	S	53.2	D	33.9	C
12	Acacia Avenue at Soboba Street	U	17.5	C	12.4	B
D1	Soboba Street at Driveway 1	S	29.4	C	16.0	B
D2	Florida Avenue at Driveway 2	U	11.1	B	11.5	B

Note:
- **Bold** values indicate intersections operating at an unacceptable Level of Service
- Intersection operation is expressed in volume-to-capacity (v/c) ratio for signalized intersections, and average delay for unsignalized intersections.
- Delay values for unsignalized intersections represent the average vehicle delay on the worst (highest delay) intersection approach.

Review of Table 25 indicates that, with the addition of Cumulative Projects traffic, all study intersection would continue to operate at an acceptable Level of Service.



1. Ramona Expy at Main St/Lake Park Dr	2. Ramona Expy at Esplanade Ave	3. Ramona Expy at Hemet St	4. Florida Ave at Santa Fe St	5. Florida Ave at San Jacinto St
33/6 ↓ 2/7 ↓ 22/7 → 22/7 ↘ 33/6 ↑ 1/7 ↑	5/17 ↓ 23/14 ↓ 15/10 → 24/39 ↘ 21/40 ↑ 35/13 ↑	1/1 ↓ 41/50 ↓ 0/1 → 20/13 ↘ 11/20 ↑ 50/50 ↑	5/3 ↓ 4/13 ↓ 1/4 ↓ 1/4 ↑ 68/85 ← 1/4 ↑ 2/6 → 43/103 → 12/8 ↑ 1/4 ↑	17/12 ↓ 23/27 ↓ 14/20 ↓ 15/21 ↑ 58/81 ← 1/8 ↑ 10/17 → 42/94 → 40/22 ↑ 2/7 ↑
6. Florida Ave at Girard St	**7. Florida Ave at Columbia St**	**8. Florida Ave at Stanford St**	**9. Florida Ave at Meridian St**	**10. Florida Ave at Hemet St**
1/8 ↓ 67/82 ← 49/95 → 2/1 ↘ 2/1 ↑ 2/7 ↑	4/23 ↓ 1/8 ↓ 4/23 ↓ 7/21 ↑ 28/52 ← 6/20 ↑ 7/21 → 29/54 → 11/36 ↘ 33/21 ↑ 2/7 ↑ 18/12 ↑	35/75 ← 3/11 ↑ 47/69 → 9/6 ↑	36/79 ← 50/71 →	35/75 ← 49/67 →
11. Florida Ave at Soboba St	**12. Soboba St at Acacia Ave**	**D1. Soboba St at Driveway 1**	**D2. Florida Ave at Driveway 2/Merlyn St**	
4/13 ↓ 31/62 ← 12/8 → 37/59 →				

LEGEND:
- (X) = Study Intersection
- XX/YY = AM/PM Peak Hour Turning Movement Volumes

EXHIBIT 12: Cumulative Projects Traffic Volumes
Hemet Imagine
City of Hemet

Not to scale

Kimley»Horn

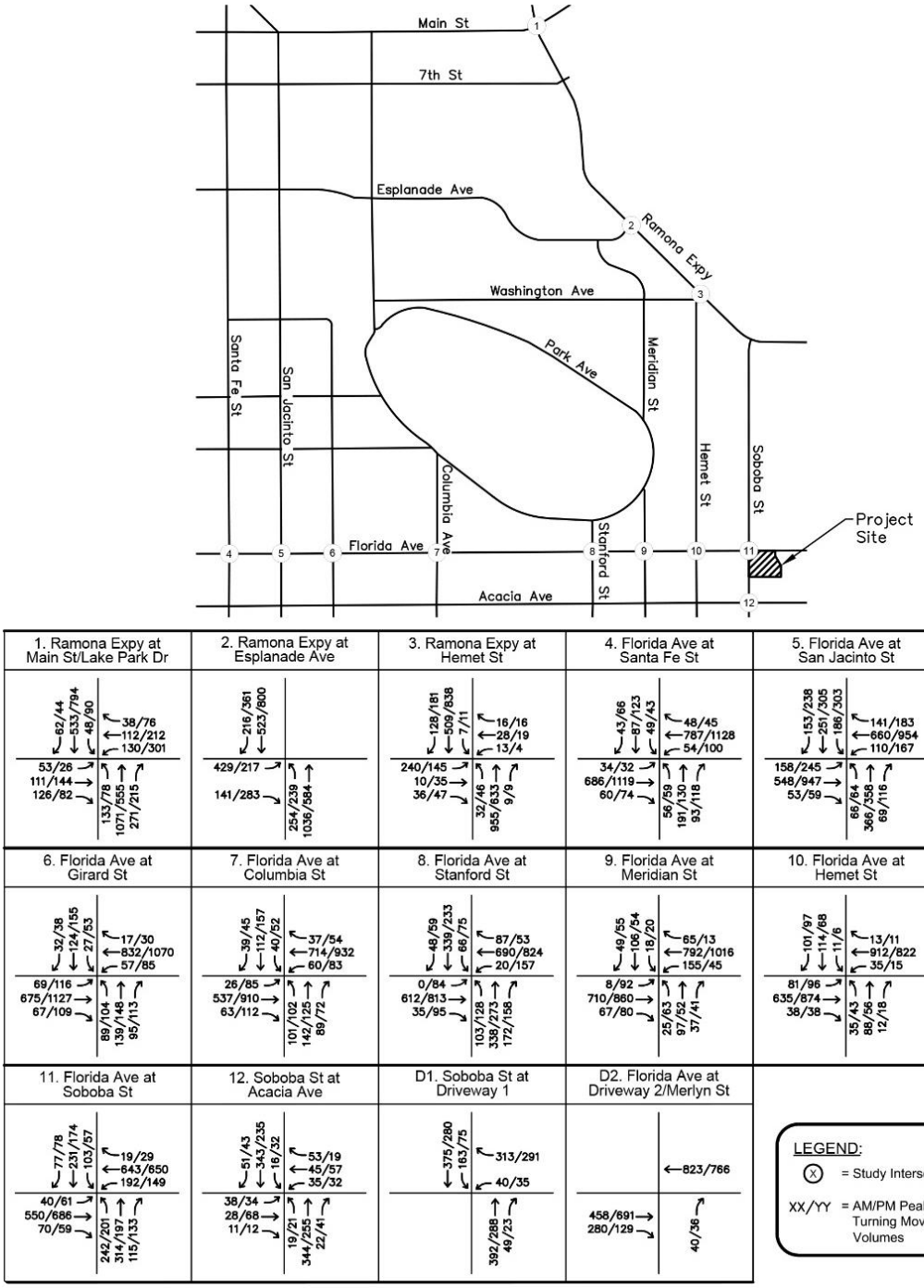


EXHIBIT 13: Opening Year 2026 Cumulative Traffic Volumes

Hemet Imagine

City of Hemet

Not to scale

Kimley»Horn

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

FINDINGS

Based on the impact criteria presented in Table 25, all study intersections operate an acceptable LOS under all conditions; therefore, ***no intersection improvements are needed***.

37. Transportation **a)** Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐

Less than Significant. The proposed Project is anticipated to generate a negligible amount of vehicular and truck traffic from construction activities. It is anticipated that vehicular, bicycle, transit, pedestrian traffic and truck traffic would be generated from operational activities. According to the discussion above, the associated Project traffic would ***not cause any significant impacts under "Plus Project" scenario, and as such, no mitigation measures are warranted***. Furthermore, pursuant to SB743, operational level of service is no longer a significant impact under CEQA.

It is anticipated that vehicular, bicycle, school buses, pedestrian traffic and occasional truck traffic from deliveries would be generated from operational activities. The proposed Project is in response to the need to provide additional educational space for new incoming students and for those transitioning to a higher-grade level.

The proposed Project traffic is anticipated to produce a total of 883 AM Peak Hour Trips and 589 PM Peak Hour Trips. As noted in the discussion above, all study intersections would continue to function within acceptable levels of service and no mitigation measures are necessary.

Additionally, to minimize traffic impacts, three additional school buses will be made available to qualified students. Based on the assumed trip generation rates, the proposed Project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The anticipated Project related traffic would meet the Imagine Schools Traffic Operations Plan. Additionally, the Project site is not located within a transportation agreement area, nor is it located in a Community and Environmental Transportation Acceptability Process Corridor (CETAP). A less than significant impact would occur.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐

Less than Significant.

VEHICLE MILES TRAVELED (VMT) ASSESSMENT

SB 743 was approved by the California legislature in September 2013. SB 743 requires changes to California Environmental Quality Act (CEQA), specifically directing the Governor's Office of Planning and Research (OPR) to develop alternative metrics to the use of vehicular "Level of Service" (LOS) for evaluating transportation projects. OPR has updated guidelines for CEQA and written a technical advisory for evaluating transportation impacts in CEQA and set a deadline of July 2020. OPR has recommended that Vehicle Miles Traveled (VMT) replace LOS as the primary measure of transportation impacts.

Since County of Riverside is yet to adopt VMT based thresholds for a Charter School, a qualitative VMT analysis has been provided instead.

Proximity to Transit

As previously noted, transit service to the project area is provided by Riverside Transit Agency (RTA), which serves the City of Hemet and surrounding cities. The RTA bus stops closest to the project site are located at the northwest and southeast corners of the intersection of Soboba Street at Florida Avenue.

Descriptions of the bus routes serving the project area are provided below.

RTA Route 28 operates between the City of Perris and the City of Hemet, traveling along Florida Avenue in the project vicinity. Route 28 operates on weekdays and weekends from approximately 4:30 AM to 12:05 AM, with approximately 45-minute headways (the time between bus arrivals).

RTA Route 32 operates between the City of San Jacinto and the City of Hemet, traveling through along Main Street, Esplanade Avenue, and San Jacinto Street in the project vicinity. Route 32 operates on weekdays and weekends from approximately 7:15 AM to 6:50 PM with approximately 1-hour headways.

RTA Route 33 operates within the City of Hemet, traveling along Stanford Street, Florida Avenue, and San Jacinto Street in the project vicinity. Route 33 operates on weekdays and weekends from approximately 8:10 AM to 6:50 PM with approximately 45-to 90-minute headways.

The project's proximity to existing transit service will likely reduce the automobile VMT associated with the project. However, the project does not qualify for screening based on its location within a half-mile radius of a high-quality transit corridor as the transit routes in the vicinity of the project do not have a headway of 15 minutes or lower during peak hours.

Screening Threshold for Land Use Projects

OPR Technical Advisory suggests that the County may screen out VMT impacts using project size, maps, transit availability, and provision of affordable housing to quickly identify when a project should be expected to cause a less-than-significant impact without conducting a detailed study. Based on the OPR Technical Advisory, projects that generate or add 110 or fewer daily trips could be considered not to lead to a significant impact.

The project proposes to add 751 additional students to the 149 existing students for up to 900 students at build out. The project is estimated to generate 1,286 additional daily trips for a total of 1,506 daily trips under school build out (see Table 8). As such, the project does not meet the 110-trip threshold.

Project VMT

In the absence of adopted VMT thresholds by the lead agency for unique land uses such as a charter school, a logical way to evaluate this type of facility is to consider the major trip purposes of the site in terms of their trip length and frequency. Given the description, three types of trips were broadly considered for this development given its context: (1) employee commute trips; (2) trips related to student drop-off and pick up; and (3) other trips related to the functioning of the school. The following discussion is provided regarding these three broad trip types.

- **Employee commute trips.** It is understood that many of Riverside County's residents travel considerable distance for employment. The Southern California Association of Government (SCAG) Local Profile Report (May 2019) for the County of Riverside identifies 48% of commuters work and live in Riverside County, while 52% commute to other places. Most often an important strategy for reducing VMT in a community like this is to improve the local jobs/housing balance by increasing the number of employment opportunities. As such, it is reasonable to expect that increasing local employment opportunities will reduce the average commuter trip lengths of residents, resulting in a net decrease to regional net VMT. The VMT per Employee for the traffic analysis zone (TAZ) in which the project is located as compared to the countywide average VMT per Employee based on the Riverside County Transportation Analysis Model (RivTAM). The project is located in RivTAM TAZ 4381, which is estimated to have VMT per Employee of 9.1. This is lower than the average VMT per Employee of 14.2 for the County of Riverside. As such, the VMT impact from employee commute trips can be presumed to be less than significant.
- **Trips related to student drop off and pick up.** The project is a public charter school that is authorized through the Riverside County Office of Education. Charter schools must meet the same academic

requirements as traditional public schools. Charter schools do not just serve "local" residents within a specific geographic area but provide parents with expanded education options. The service area for the existing students was provided by the school and is shown in **Exhibit 14**, *Project Service Area*. As shown, the project serves and is expected to serve a majority of students in Hemet, East Hemet and San Jacinto areas with a few students traveling from farther distances. The service area is comparable to the overall service area of Hemet Unified School District (HUSD). However, the service area is larger if compared to individual school boundaries of public elementary schools; refer to **Exhibit 15**, *HUSD Elementary School Attendance Area* and middle schools, refer to **Exhibit 16**, *HUSD Middle School Attendance Area,* in the district. It is reasonable to assume that the project would meet demand for charter school from existing and new residential uses in the area that would otherwise travel in the region for the service.

- **Other trips.** These are often the smallest number and shortest distance of trips for a facility like this and include a broad range of trip types, such as, employee lunches off-site, maintenance teams for on-site infrastructure, supply deliveries, etc. As such their impact to the overall VMT of the site is likely minimal. As such it is not likely that they are impactful to the local transportation system and are secondary to the other two trip types discussed.

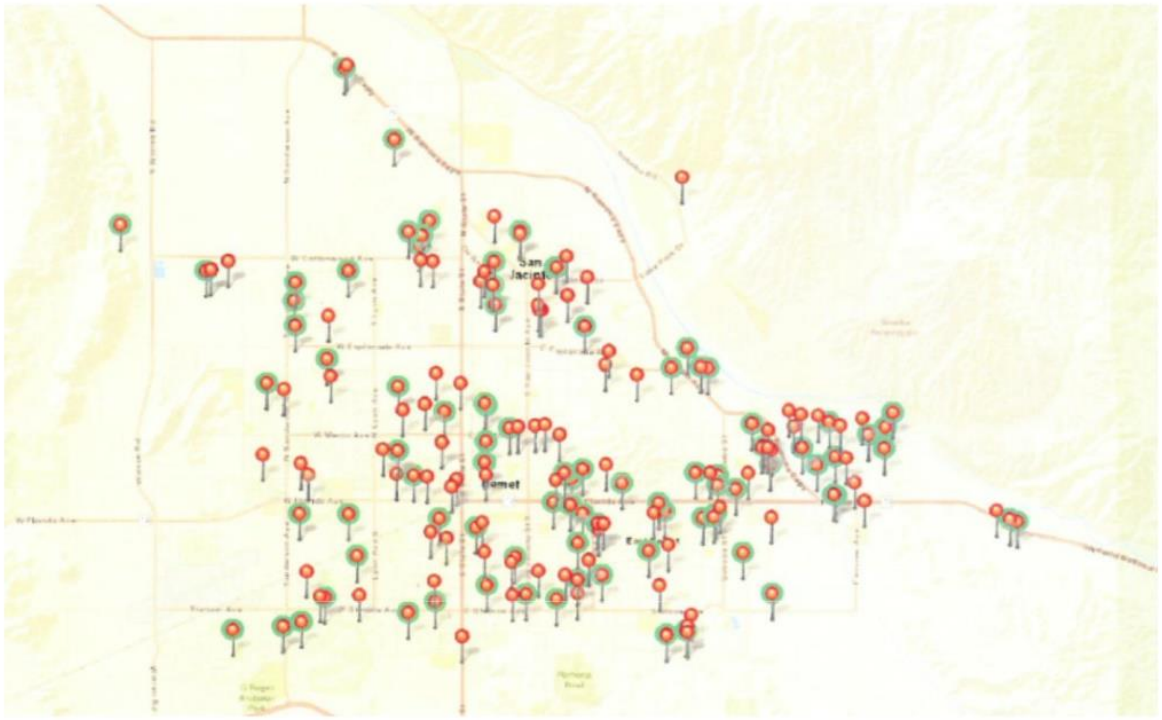


EXHIBIT 14: Project Service Area
Hemet Imagine
City of Hemet

Not to scale

Kimley»Horn

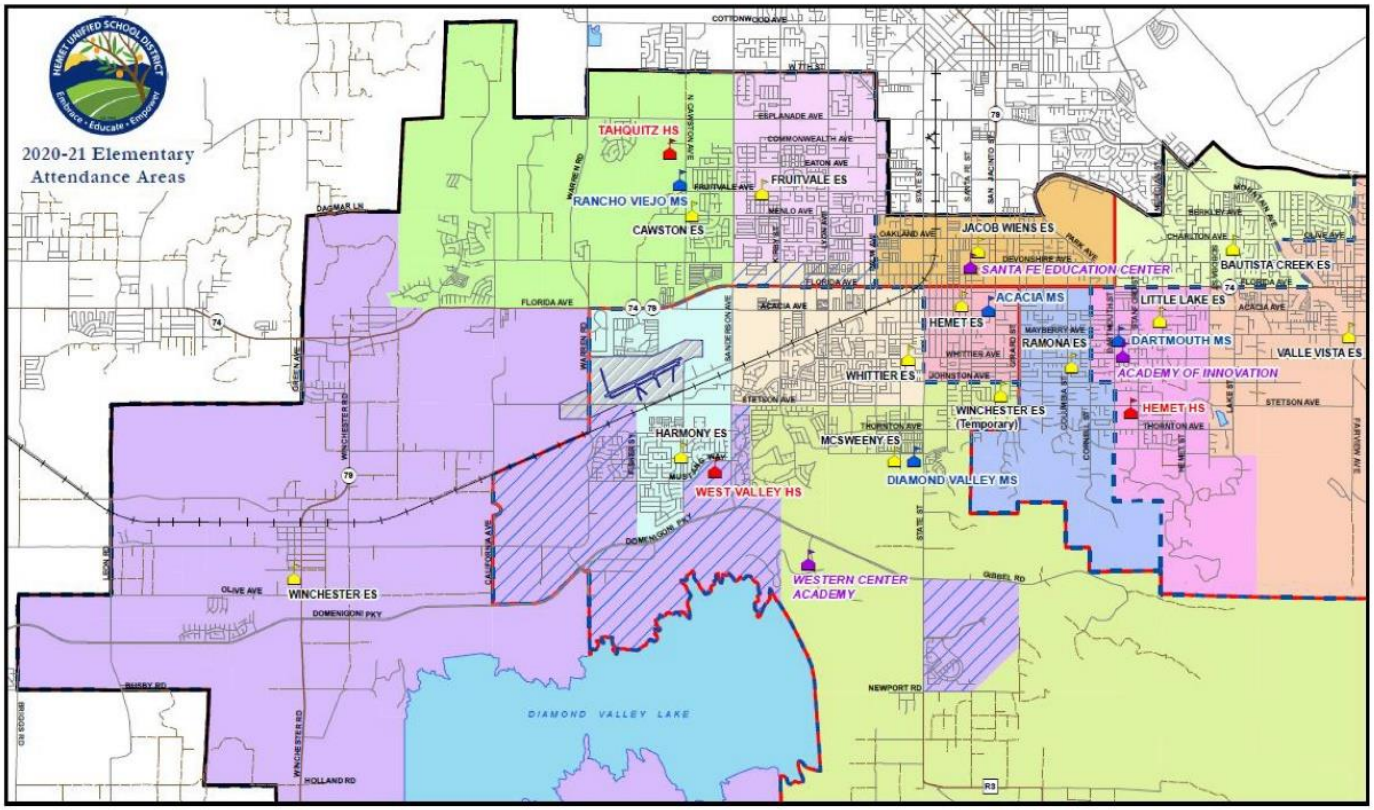


EXHIBIT 15: HUSD Elementary School Attendance Area
Hemet Imagine
City of Hemet

Not to scale

Kimley»Horn

CEQ / EA No.

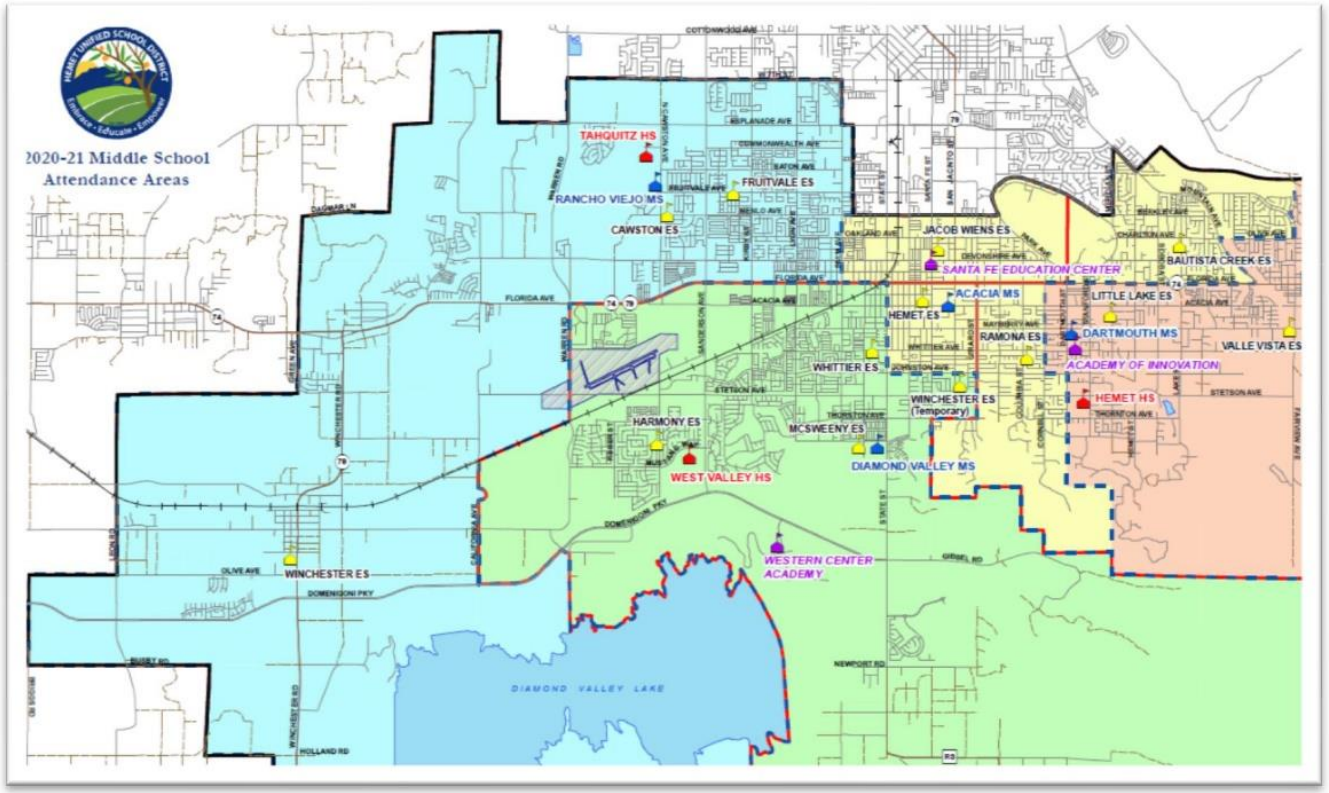


EXHIBIT 16: HUSD Middle School Attendance Area
Hemet Imagine
City of Hemet

Not to scale

Kimley»Horn

BUS PLAN

Based on the projected number of bus riders; refer to **Table 3**, *Projected Bus Riders per School Year* (previously referenced), Imagine School plans to provide two 72-passenger busses and one 45-passenger bus, all running double routes, to accommodate these projections. As the school continues to expand, an additional 72-passenger bus will be considered if the need arises.

SITE ACCESS

The project site plan presented on **Exhibit 3**, *Site Plan* (previously referenced), indicates that vehicular access provisions for the project site would consist of the following unsignalized driveways:

- **Driveway 1** is an existing full-movement driveway on Soboba Street and will provide the main egress point for the Imagine Charter School Hemet project during the morning drop-off and afternoon pick-up periods. Driveway 1 is located approximately 240 feet south of Florida Avenue.
- **Driveway 2** is an existing right-in-right-out (RIRO) driveway on Florida Avenue that will provide the main ingress point to the Imagine Charter School Hemet project during the morning drop-off and afternoon pick-up periods. Driveway 2 is located approximately 590 feet east of Soboba Street.

The school is planning to operate drop-off and pick-up periods during the following times:

- Morning Drop-off Period: 7:30 AM to 8:00 AM (all grades)
- Afternoon Pick-up times will be staggered by grade as follows:
  - TK/Kindergarten: 2:40 PM to 2:50 PM
  - Grades 1 and 2: 2:50 PM to 3:30 PM
  - Grades 3 through 5: 3:00 PM to 3:10 PM
  - Grades 6 through 8: 3:10 PM to 3:20 PM

Project Design Feature (VMT)

Free bus transportation is offered to the students attending the charter school. The draft bus route plan, shown in **Exhibit 17**, *Draft Bus Route Plan*, includes two buses and four routes. As shown, students traveling from farther distances have the option to use the bus service, thus reducing passenger car VMT. It is recommended that bus routes be expanded in line with student expansion to provide transit option for students farther away from typical service area for a public elementary and middle school shown previously to mitigate the increase in passenger car VMT from the project.

Finally, it is worth noting that while this project is expected to provide additional student-related trips to the area, the facility itself is not expected to be the principal catalyst for new trips. Rather, it is anticipated that these trips would most likely occur regardless of whether this location were developed as it is in response to a likely existing and future demand for services in the region. Accordingly, if this site were not developed, a similar site will be developed elsewhere to meet this demand and as such the alternative to this development would likely not eliminate any related VMT. In consideration of this and the other mitigation measures discussed above, it is anticipated that this project would not result in a significant finding for VMT impact.

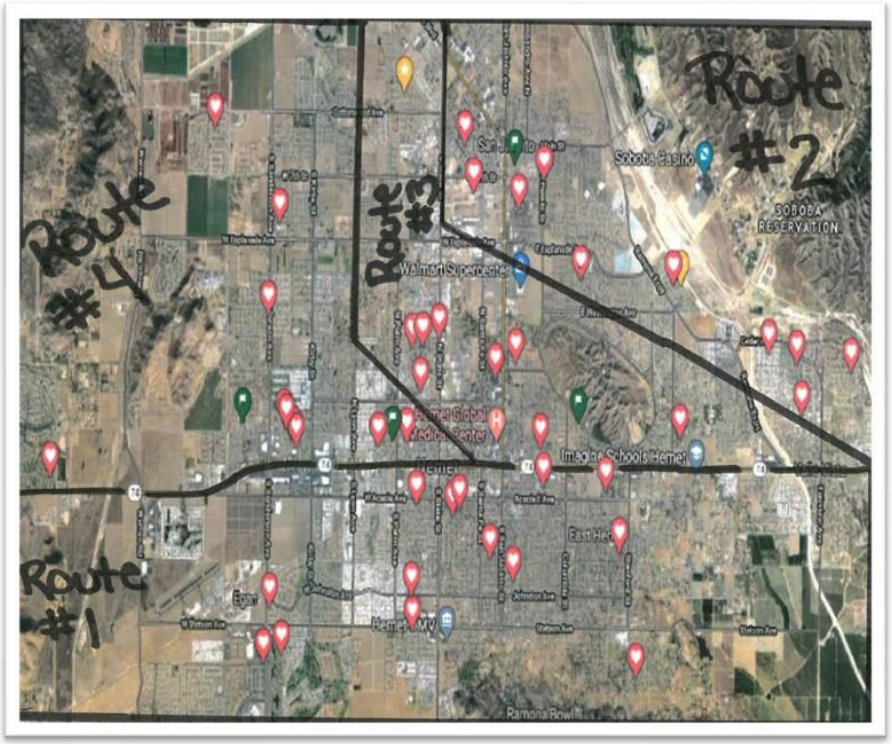


EXHIBIT 17: Draft Bus Route Plan
Hemet Imagine
City of Hemet

Not to scale

Kimley»Horn

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒

No Impact. The proposed Project does not modify existing or create new roadways and/or intersections. The proposed Project uses would be consistent with the existing use of the site and impacts are evaluated throughout this initial study. No impact would occur.

d) Cause and effect upon, or a need for new or altered maintenance of roads?	☐	☐	☐	☒

No Impact. As previously noted, the proposed Project would not alter of the existing roadway system or infrastructure. Similarly, the Project would not require additional maintenance roadway maintenance. No impact would occur.

e) Cause and effect upon circulation during the project's construction?	☐	☐	☐	☒

Less than Significant. As previously noted, Project related construction activities would be minimal and would be limited to the installation of the three pre-constructed modular buildings. Additionally, construction activities would include demolition of concrete and grading of existing grass area totaling 0.68-acres. The Project would not alter traffic circulation during the Project's construction. A less than significant impact from construction activities would occur.

f) Result in inadequate emergency access or access to nearby uses?	☐	☐	☒	☐

No Impact. The proposed project would provide access points on Soboba Street (full-movement driveway) and Florida Avenue/SR 74 (right-in right-out driveway). The two existing roadways and driveways would meet access standards of the Riverside County Fire Dept. / Cal Fire. Construction of the proposed project is not expected to require road closures or otherwise affect emergency access around the site perimeter. As a standard practice, if road closures (complete or partial) were necessary, the Sheriff and Fire Departments would be notified of the construction schedule and any required detours would allow emergency vehicles to use alternate routes for emergency response. However, no impact from project implementation on emergency access or access to nearby uses is anticipated to occur.

Source(s): Riverside County General Plan, Project Application Materials

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

38. Bike Trails a) Include the construction or expansion of a bike system or bike lanes?	☐	☐	☐	☒

No impact. The proposed project does not include the construction or expansion of a bike system or bike lanes. Additionally, implementation of the proposed project would not affect an existing bike system or bike lanes. No impact would occur.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Source(s): Riverside County General Plan

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

TRIBAL CULTURAL RESOURCES Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

39. Tribal Cultural Resources				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?	☐	☐	☐	☒

No impact. The proposed Project does not involve heavy grading or trenching activities. The proposed Project would introduce three pre-fabricated portable buildings. No impact to historical resources would occur as part of the proposed Project.

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)	☐	☐	☐	☒

No impact. As noted above in Response 39(a), the proposed Project would not require the disturbance of soil to depths that could encounter any resources. Additionally, the site has been previously graded. The shallow footing required for the pre-fabricated structures would only require shallow excavation activities. No Tribal Cultural Resources would be impacted as part of the proposed Project.

Source(s): County Archaeologist

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
UTILITIES AND SERVICE SYSTEMS Would the project:				
40. Water				
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 sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?				

Water and wastewater services are provided to the Project site by LHMWD whose service area encompasses a total of approximately 12,700 acres. The District's water supply and treatment facilities are divided into three groupings:

- Surface water intakes;
- Groundwater production wells; and
- Raw water storage reservoirs, and imported water from EMWD

Wastewater is treated at either Eastern Municipal Water District's (EMWD) Perris Valley or San Jacinto Valley Regional Water Reclamation Facility. EMWD presently operates four regional water reclamation facilities and are capable of producing tertiary treated water.

Water Master Plan, existing water supply systems, and wastewater treatment facilities have capacity to serve the Project.[24] The additional student would be staggered and would continue until school year 2006/27 when it is anticipated to reach the maximum number of students at a maximum of 900. The proposed project is a permitted use and this use has been accounted for in the LHMWD Water Master Plan. Because the proposed Project would not require or result in the relocation or construction of new or expanded utility services. A less than significant impact would occur.

Source(s): Project Application Materials, Water Company

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

41. Sewer				
a) Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?	☐	☐	☒	☐
b) Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				

Less than Significant. The Project site is a fully functional school with wastewater treatment provided by EMWD. The additional anticipated students and staff members are not anticipated to create a significant

[24] LHMWD. (2010). *Lake Hemet Municipal Water District: Water Master Plan.* Accessed December 2, 2020. Retrieved from: https://www.lhmwd.org/files/LHMWD-WATER%20MASTER%20PLAN.pdf

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

impact on the wastewater facilities. Implementation of the proposed Project would not require the construction of new wastewater treatment facilities. A less than significant impact would occur.

Source(s): Department of Environmental Health Review

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

42. Solid Waste				
a) Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

Less than Significant. The main disposal site that would serve the project site is the El Sobrante Landfill in Corona. The landfill is projected to reach its full capacity of 209,910,000 cy in 2051 (CalRecycle 2019). The landfill covers approximately 1,322 acres and has a maximum permitted throughput of approximately 16,054 tons/day (CalRecycle 2019). The El Sobrante Landfill has a remaining capacity of 143,977,170 tons (CalRecycle 2019). The proposed Project is not anticipated to create a significant amount of solid waste from the additional staggered students and staff members. Furthermore, CalRecycle establishes waste generation rates for different land uses. The institutional section waste generation rate is 3.55 lbs/employee/day. Under this assumption, the additional staff and students would create a nominal increase per day of solid waste. The amount of solid waste that is anticipated to be generated by the additional students and staff would be negligible compared to the El Sobrante's remaining capacity. A less than significant impact would occur.

b) Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?	☐	☐	☒	☐

No impact. The Countywide Integrated Waste Management Plan (CIWMP) was prepared in accordance with the California Integrated Waste Management Act of 1989, Chapter 1095 (AB 939). AB 939 redefined solid waste management in terms of both objectives and planning responsibilities for local jurisdictions and the state. AB 939 was adopted in an effort to reduce the volume and toxicity of solid waste that is landfilled and incinerated by requiring local governments to prepare and implement plans to improve the management of waste resources.

AB 939 requires each of the cities and unincorporated portions of counties throughout the state to divert a minimum of 25% by 1995 and 50% of the solid waste landfilled by the year 2000. To attain these goals for reductions in disposal, AB 939 established a planning hierarchy utilizing new integrated solid waste management practices.

The CIWMP, in its entirety, is comprised of the Countywide Summary Plan; the Countywide Siting Element; and the Source Reduction and Recycling Elements (SRRE's), Household Hazardous Waste Elements (HHWE's), and Non-disposal Facility Elements (NDFE's) for Unincorporated Riverside County and each of the cities in Riverside County.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

As noted in Response 42 (a), the proposed Project would not add a large amount of solid waste to the existing school which could conflict with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP. A less than significant impact would occur.

Source(s): Riverside County General Plan, Riverside County Waste Management District correspondence

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

a) Electricity?
b) Natural gas?
c) Communications systems?
d) Street lighting?
e) Maintenance of public facilities, including roads?
f) Other governmental services?

Less than significant impact. The additional amount of student and staff members would not require additional electricity, natural gas, communication systems, street lighting, maintenance of public facilities/roads, or other governmental agencies to the extent that resources would be depleted or impacted. Similarly, as previously noted, the proposed Project would not require the construction any of the previously mentioned resources, because the Project site is a fully functional charter school currently provided by all of the necessary resources for its functionality, including electricity, gas, communication systems, street lighting, roads, and other governmental agencies. A less than significant impact would occur.

Source(s): Project Application Materials, Utility Companies

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

WILDFIRE If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the project:

44. Wildfire Impacts a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

No Impact. California Government Code Chapter 6.8 directs the California Department of Forestry and Fire Protection (CALFIRE) to identify areas of very high fire hazard severity within Local Responsibility Areas (LRA). Mapping of the areas, referred to as Very High Fire Hazard Severity Zones (VHFHSZ), is based on data and models of potential fuels over a 30- to 50-year time horizon and their associated expected fire behavior and expected burn probabilities, which quantifies the likelihood and nature of vegetation fire exposure to

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

buildings. LRA VHFHSZ maps were initially developed in the mid-1990s and are now being updated based on improved science, mapping techniques, and data. In 2008, the California Building Standards Commission adopted California Building Code Chapter 7A requiring new buildings in Very High Fire Hazard Severity Zones to use ignition-resistant construction methods and materials.

The project is not located within or near a SRA or land classified as a Very High Fire Severity Zone (VHFSZ). The nearest VHFHSZ is located approximately one-mile northwest from the project site. Construction and installation activities would all occur onsite. The proposed project would not impact an adopted emergency response plan or emergency evacuation plan. No impact would occur.

b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒

No Impact. As discussed in the San Jacinto Valley Area Plan, wind impact and wildfire impact is present along Gilman Springs, and Soboba Roads, the lakeview Mountains west of Warren Road, and lower San Jacinto Valley southerly of Stetson Avenue. The project site is not prone to wildland fires caused by high slopes, prevailing winds, or other natural environmental factors that would expose workers, staff members, or students to high concentrations of pollutants. If the event of a wildfire, staff and students would not be directly exposed to pollutant concentrations from a wildfire. Therefore, no impact would occur.

c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒

No Impact. As previously discussed, all project components (including infrastructure, etc.) would occur within the boundaries of the project site and would be limited to the installation of the modular buildings which are prefabricated. The project would not modify the site in such a way that it would require the installation of roads, fuel breaks, emergency water sources, power lines, or other utilities. No impact would occur.

d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒
e)	Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				

No Impact. The Project site is not located in high slopes, and no natural drainage courses are located on-site. The proposed project would add additional students and staff capacity to the existing school site. No exposure of people or structures to downslope or downstream flooding, landslides, or wildfire would result from implementation of proposed project. No impact would occur.

Source(s): Riverside County General Plan Figure S-11 "Wildfire Susceptibility," GIS database, Project Application Materials

Findings of Fact: There will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE Does the Project:				
45. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐

Less Than Significant Impact. All impacts to the environment, including impacts to habitat for fish and wildlife species, fish and wildlife populations, plant and animal communities, rare and endangered plants and animals, and historical and pre-historical resources were evaluated as part of this IS/MND and discussed in Biological Resources.

As discussed in Biological Resources, impacts were determined to be less than significant and other would have no impact. Thus, mitigation measures were not necessary. As such, a less than significant impact would occur

Source(s): Staff Review, Project Application Materials

Findings of Fact: Implementation of the proposed project would not substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife populations to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

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

Less than Significant Impact. As discussed throughout this IS/MND, implementation of the proposed Project would not result in significant impact effects to the environment with mitigation measures incorporated. Similarly, the proposed Project would not be cumulatively considerable in specific areas because the proposed Project adds a negligible number of students and staff and a fully functional charter school. The addition of the students and staff would be less than significant.

Source(s): Staff Review, Project Application Materials

Findings of Fact: The project does not have impacts which are individually limited, but cumulatively considerable.

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

Less Than Significant Impact. The Project's potential to result in environmental effects that could adversely affect human beings, either directly or indirectly, has been discussed throughout this IS/MND. Construction and operation of the proposed Project would not involve any activities that would result in environmental

effects which would cause substantial adverse effects on human beings, either directly or indirectly due to existing project features, and current emergency/evacuation features set by the charter school. A less than significant impact would occur.

Source(s): Staff Review, Project Application Materials

Findings of Fact: The proposed project would not result in environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly.

VI. EARLIER ANALYSES

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

Earlier Analyses Used, if any:

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

Location: County of Riverside Planning Department
4080 Lemon Street 12th Floor
Riverside, CA 92501

VII. REFERENCES

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Riverside County General Plan Figure C-8 "Scenic Highways", San Jacinto Valley Plan. https://planning.rctlma.org/Portals/14/genplan/general_Plan_2017/areaplans/SJVAP_120616.pdf?ver=2017-10-06-094252-663. Accessed October 1, 2020.

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