Initial Study/
Mitigated Negative Declaration

for

Paradise Valley Ranch
Conditional Use Permit No. 210005

Lead Agency:

County of Riverside
4080 Lemon Street, 12th Floor
Riverside, CA 92502
Point of Contact: Evan Langan, Principal Planner
951.955.3024

Project Proponent:

PVR Management, LLC
8895 Research Drive
Irvine, CA 92618
Point of Contact: Kenneth Jackson
213.700.7741

Prepared by:

Matthew Fagan Consulting Services, Inc.
42011 Avenida Vista Ladera
Temecula, CA 92591
Point of Contact: Matthew Fagan, Owner
951.265.5428
matthewfagan@roadrunner.com

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Commonly Used Abbreviations and Acronyms

AAQS	Ambient Air Quality Standards
AB	Assembly Bill
AC	Acre
ACOE	U.S. Army Corps of Engineers
ADP	Area Drainage Plans
ADT	Average Daily Traffic
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMSL	Above Mean Sea Level
APN	Assessor's Parcel Number
AQ/GHG	Air Quality/Green House Gas
AQMP	Air Quality Management Plans
ARB	Air Resources Board
Basin	South Coast Air Basin
BMPs	Best Management Practices
BUOW	Burrowing Owl
CAAQS	California Ambient Air Quality Standards
CalARP	California Accidental Release Prevention Program
CalEEMod™	California Emissions Estimator Model™
Cal/EPA	California Environmental Protection Agency
CalFire	Riverside County Fire Department
CALGreen	California Green Building Standards Code
Cal/OSHA	California Occupational Safety and Health Administration
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CUP	Conditional Use Permit
CZ	Change of Zone
dB	Decibel
dBA	A-Weighted Decibel
dBA CNEL	A-weighted decibel Community Noise Equivalent Level
dBA Leq	A-weighted decibel equivalent noise level

EAP	Existing Plus Ambient Growth Plus Project
EAPC	Existing Plus Ambient Growth Plus Project Plus Cumulative
FEMA	Federal Emergency Management Act
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping & Monitoring Program
GHG	Greenhouse Gas
GP	General Plan
GPA	General Plan Amendment
GPEIR	General Plan Environmental Impact Report
HCM	Highway Capacity Manual
HCOC	Hydrologic Conditions of Concern
HCP	Habitat Conservation Plan
HOV	High-Occupancy Vehicle
HRA	Health Risk Assessment
LOS	Level of Service
LST	Localized Significance Thresholds
MLD	Most Likely Descendent
MM	Mitigation Measure
MSHCP	Western Riverside County Multiple Species Habitat Conservation Plan
$MTCO_2e$	Metric Tons of Carbon Dioxide Equivalent
N_2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NEPSSA	Narrow Endemic Plants Survey Area
NO_2	Nitrogen Dioxide
NOA	Naturally Occurring Asbestos
NO_X	Oxides of Nitrogen
NPDES	National Pollution Discharge Elimination System
O_3	Ozone
Pb	Lead
PFCs	Perfluorocarbons
PHS	Preliminary Hydrology Study
PM	Afternoon
$PM_{2.5}$	Fine Particulate Matter
PM_{10}	Respirable Particulate Matter
Ppb	Parts Per Billion
Ppm	Parts Per Million
PPV	Peak Particle Velocity
PRC	Public Resources Code

PVC	Polyvinyl Chloride
PV	Photovoltaic
RCFC&WCD	Riverside County Flood Control and Water Conservation District
RCFD	Riverside County Fire Department
RCIP	Riverside County Integrated Project
RCSD	Riverside County Sheriff's Department
RCTC	Riverside County Transportation Commission
RTA	Riverside Transit Authority
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RV	Recreational Vehicle
RWQCB	Regional Water Quality Control Board
SARWQCB	Santa Ana Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SO_2	Sulphur Dioxide
SO_x	Sulphur Oxides
SoCAB	South Coast Air Basin
Sq. Ft.	Square Feet
TAC	Toxic Air Contaminant
USFWS	United States Fish and Wildlife Service
USGS	U.S. Geological Survey
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VPD	Vehicles Per Day
WCCP	Wine Country Community Plan
WQMP	Water Quality Management Plan

Environmental Assessment (CEQ / EA) Number: CEQ210016
Project Case Type (s) and Number(s): Conditional Use Permit (CUP) 210005 "Paradise Valley Ranch"
Lead Agency Name: Riverside County Planning Department
Address: P.O. Box 1409, Riverside, CA 92502-1409
Contact Person: Evan Langan, Principal Planner
Telephone Number: 951-955-3024
Applicant's Name: PVR Management, LLC, Kenneth Jackson
Applicant's Address: 8895 Research Drive, Irvine, CA 92618

I. PROJECT INFORMATION

Project Description:

Location

The Paradise Valley Ranch property is located in unincorporated southwest Riverside County, east of the City of Hemet, approximately 4 miles east of State Street, at the terminus of Cactus Valley Road. The site address is 43700 Cactus Valley Road. Currently, the County of Riverside is processing a Lot Line Adjustment (LLA) involving three parcels [Assessor Parcel Numbers (APN) 569-020-024, -025, and -026] on the Paradise Valley Ranch property. Once this LLA has been processed (LLA210115), one of the three parcels (approximately 48-acres) will be used for a Conditional Use Permit (CUP) that is required for the proposed Project. This parcel will be referred to as the "CUP Parcel". The ultimate APN for the CUP Parcel will be determined upon finalization and recordation of the LLA. Reference **Figure 1, *Regional Location Map,* Figure 2, *Vicinity Map,*** and **Figure 3*, Aerial Photo***.

Center of Excellence and Wildfire Conservancy

The Paradise Valley Ranch property is proposed for development of 2 new structures and the re-development into the west coast "Center of Excellence" for firefighter mental and behavioral health and research/training site for the Wildfire Conservancy (hereafter known collectively as the proposed Project or Project).

The proposed Center of Excellence will be modeled off the first and only existing facility in the United States (located in Marlboro, MD, approximately 30 miles southeast of Washington D.C.) dedicated solely to the treatment of firefighters. Similarly, this new west coast facility will provide behavioral health treatment, specializing in drug and alcohol addiction recovery while treating any underlying traumatic causes of that behavior. The facility will be fully licensed by the State of California with professional staff trained specifically for these types of behavioral health challenges in this profession and allowing the firefighters to receive the help they need in taking steps toward recovery and wellness. Severe cases are required by the State license to be transferred to hospital care and the staff is highly trained in recognizing such conditions. It is primarily a safe haven for firefighters to talk with other peers who have faced or overcome similar challenges, designed in partnership with the International Association of Fire Fighters (IAFF) and Advanced Recovery Systems (ARS), providing this unique and focused continuum of care for firefighters.

In addition, the property will be used by the Wildfire Conservancy, a California non-profit research foundation established in 2019. The Conservancy's mission focuses on three key areas: improving firefighter health and safety (including mental and behavioral health), improving attack effectiveness, and advancing community resilience in the wildland urban interface. The Paradise

Valley Ranch will become the field station for the Wildfire Conservancy, conducting research and training programs in partnership with the California State University system, CAL FIRE, CAL FIRE Local 2881, and the IAFF (among others).

The Project's goal is to convert all existing facilities into use by the Center of Excellence and the Wildfire Conservancy. Three of these facilities are proposed for remodeling and two are proposed for extensive remodeling and/or a partial or full rebuild. All upgrades, remodeling, or reconstruction of existing facilities will use the same or similar footprint and size, built to meet the Center of Excellence's future treatment facility needs. One additional facility will be developed on the property to serve as visitor check-in, intake, exams, staff offices, and meeting rooms. A second additional facility will be developed for recovery, lodging, and treatment. See **Table 1, *Facility Components*** and **Figure 4, *Site Plan***.

Phasing

All of the proposed treatment and research facilities will be constructed in two phases although the first phase will be divided into two sub-phases (Phases 1A and 1B). The following briefly describes the specific facilities that are included in each phase based as summarized in **Table 1, *Facility Components***:

Phase 1A. This phase includes remodeling the Silverado House, Garage, Pool House, and Fitness Center but they will all retain their existing building footprints (total 11,812 sf).

Phase 1B. This phase includes extensive remodeling of the Chaparral and Ponderosa Lodges, but they will still retain their existing footprints (total 14,009 sf with the exception of the Ponderosa Lodge which has a 2,530 SF increase in size). This phase also includes the installation of eight (8) temporary trailers for office and administration functions until a permanent building can be constructed in Phase 2.

Phase 2. This phase includes construction of a new Lodge and new Office/Administration Buildings (total 33,554 sf). Once the new buildings have been completed and occupied, the eight temporary trailers installed in Phase 1B will be removed.

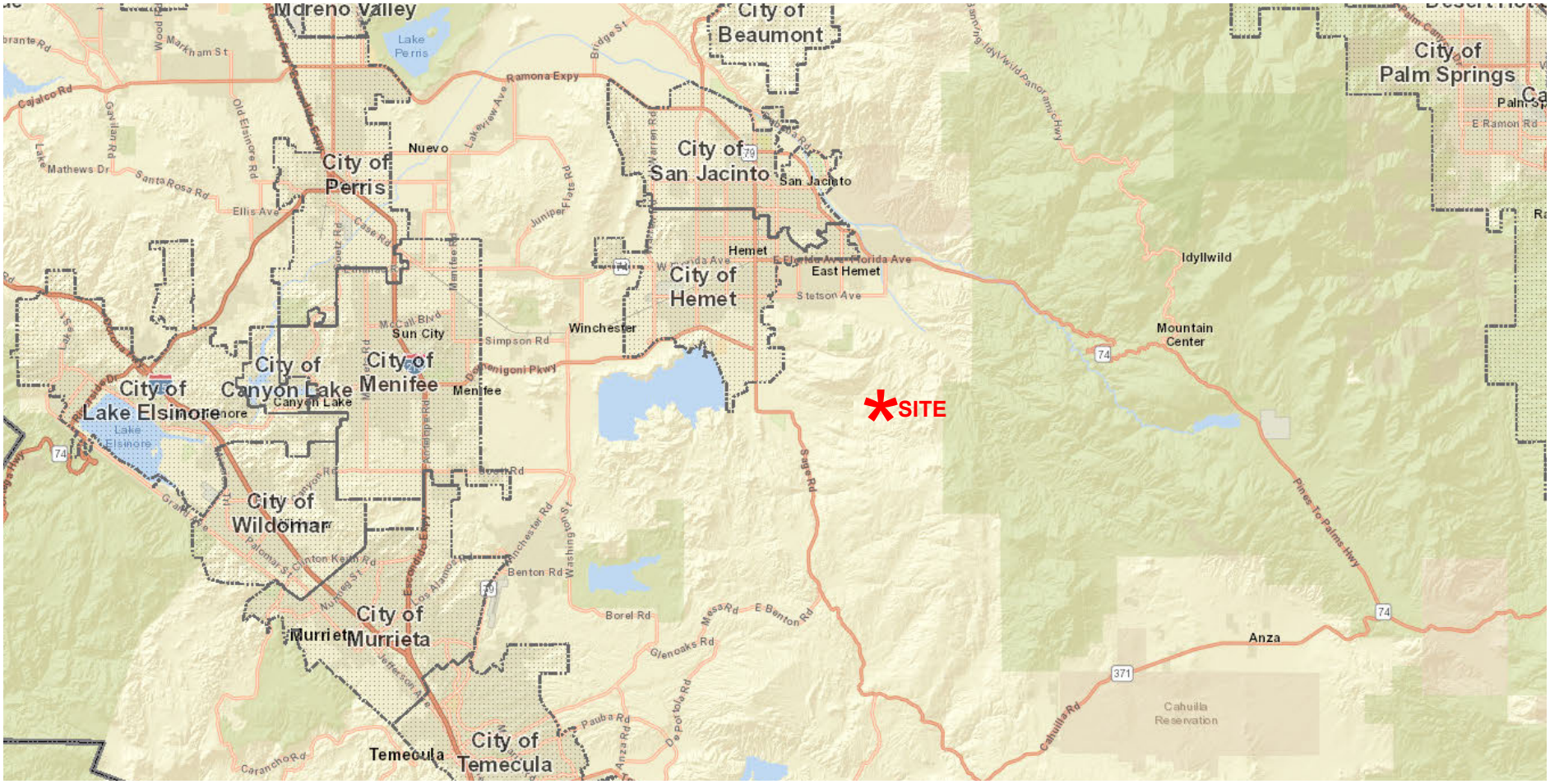
Minimal or No Change. The Project does not entail any substantial remodeling or new construction related to the Sports Courts, Hacienda House, Guest Cottages, or Barns.

Table 1
Facility Components

Site Plan ID (Phase)	Facility	Year Built	Area	Current Use	Proposed Modification/Use
Facility 1 Phase 1A	Silverado House	1998	8,467 sf	7-bedroom facility	Drug/alcohol treatment facility with up to 32 beds in 2 dwelling units (assuming R-4 occupancy with firewall between units). Remodel only, same footprint, enclose existing carport
Facility 2 Phase 1A	Garage	2004	2,400 sf	Garage and storage	A commercial kitchen meeting County of Riverside permit and use requirements and dining area Remodel only, same footprint
Facility 3 Pool House Phase 1A	Pool House/Fitness	2002	945 sf	Pool house	Exercise facility Remodel only, same footprint
Facility 4 Phase 1B	Chaparral Lodge	1966	2,160 sf	Bunk house and camp facility with 4-bedroom, kitchen, pool, 2 full baths and 2 half baths	Residential treatment facility with no more than 8 beds in 4 bedrooms, warming kitchen, dining room, living room, 1 office Extensive remodel, same footprint
Facility 5 Phase 1B	Ponderosa Lodge	1957	11,849 sf	Bunk house and camp facility with conference hall	Residential treatment facility with up to 48 beds in 10 bedrooms, offices, lounges, and recreation room Extensive remodel, converted garages (current conference room) would need to be demolished and replaced with proposed additions
Facility 6 Phase 2	New Lodge	Proposed	16,777 sf	To be built	Drug/alcohol treatment facility with up to 32 beds with kitchen, dining, and lounge spaces (two-stories)
Facility 7 Phase 2	New Offices/Intake/ Administrative[1]	Proposed	16,777 sf	To be built	The Project will require the installation of eight (8) temporary office trailers[1], to be removed after the development of a two-story, permanent structure in the same location, to be used for visitor check-in, intake, exams, staff offices, and meeting rooms
Facility 8 Guest Cottage	Guest Cottage	2002	838 sf	Guest Cottage/Residential unit with full kitchen and 1 bedroom and 1 bath	Existing Visitor residence
Facility 9 Hacienda House	Hacienda House	1957	2,000 sf	Manager's residence and camp offices	Wildfire Conservancy
Sports Courts	Sports Courts	2002	27,100 sf	Outdoor recreation	Outdoor recreation; no change
Barns	Barns/Potential Offices	1956	6,910 sf	Storage, stables	Existing - intended for use as storage/stables and equestrian therapy

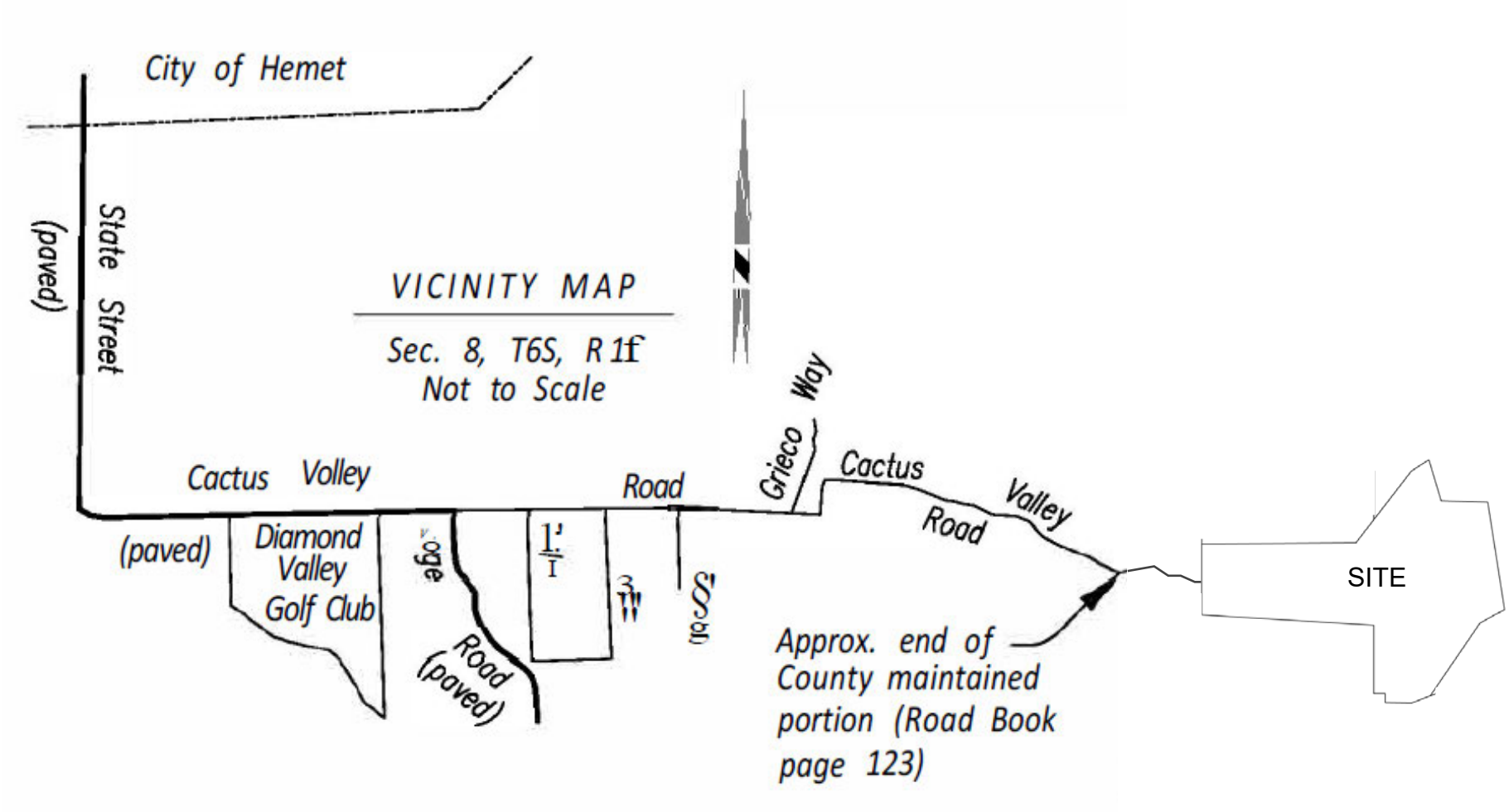
Source: Project Plans (**Appendix K**)
sf = square feet
[1] temporary office trailers to be used in Phase IB

FIGURE 1
Regional Location Map



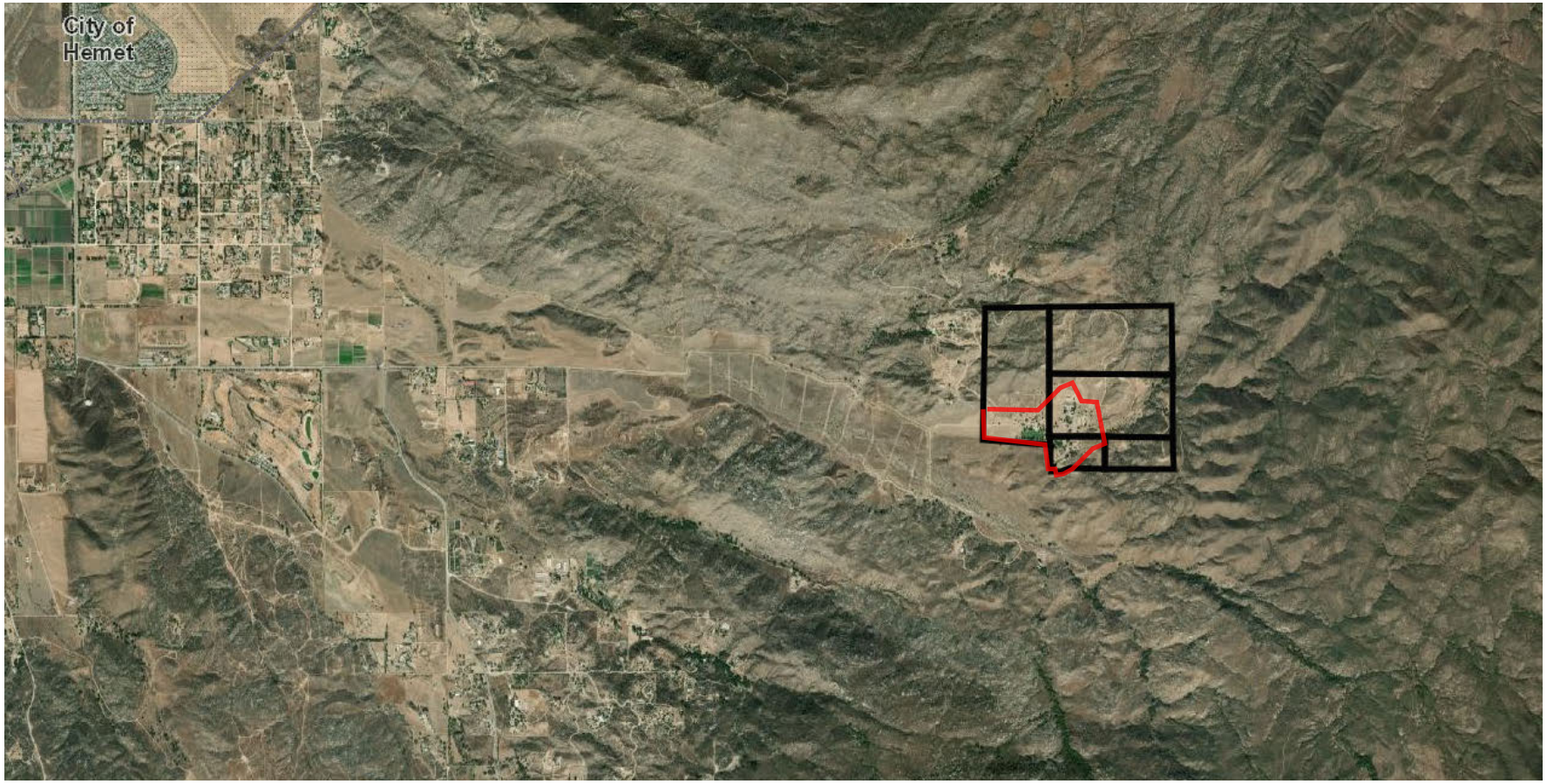
Source: Map My County https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public

FIGURE 2
Vicinity Map



Source: Project Plans (**Appendix K**)

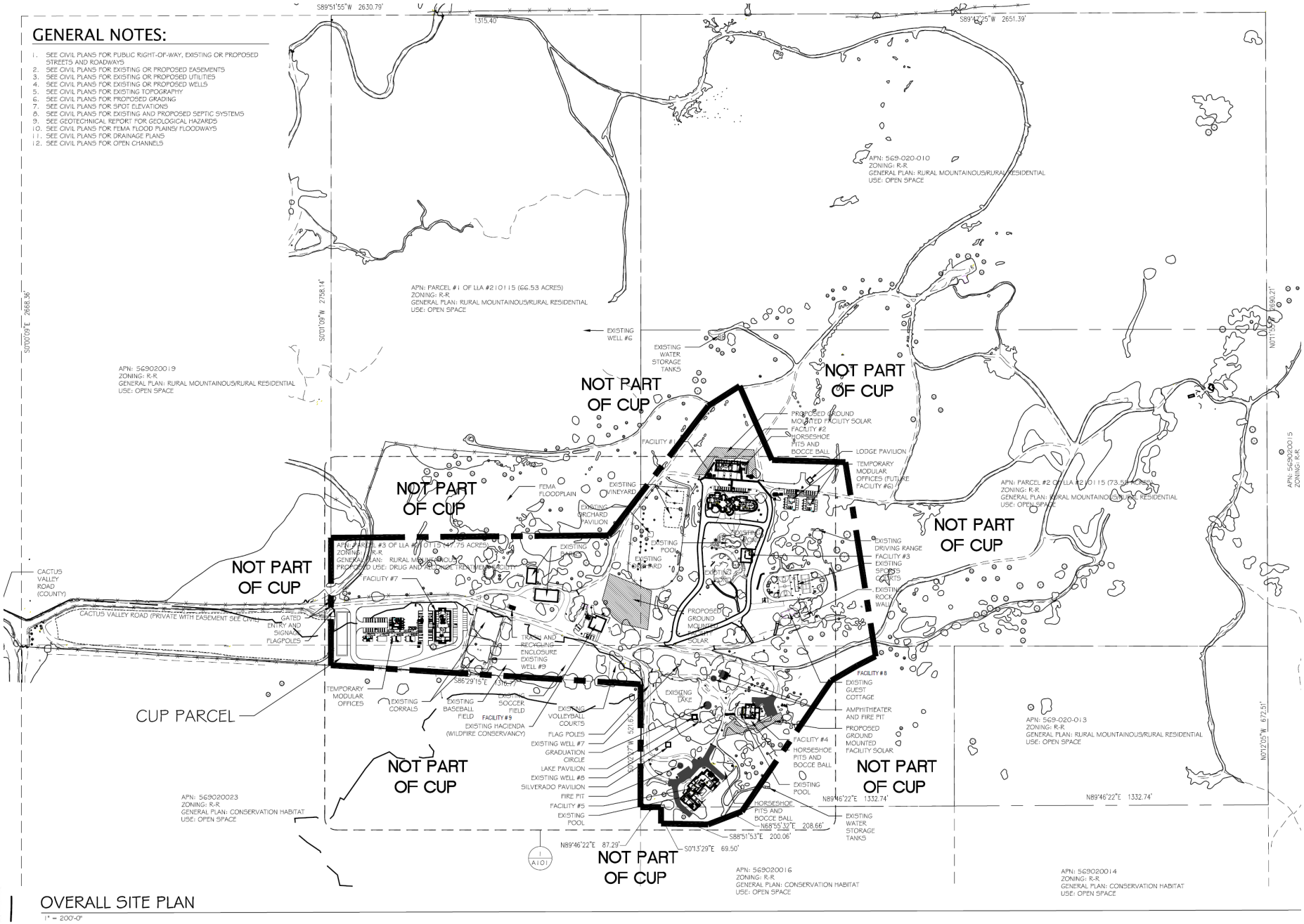
FIGURE 3
Aerial Photo



Source: Map My County https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public

Note: Red parcel lines added by MFCS, Inc, and indicate the approximately 48-acre CUP Parcel Project Site (LLA210115)

FIGURE 4
Site Plan



Source: Project Plans (**Appendix K**)

Staffing/Occupancy

Project operations are proposed to be completed in two phases; 80 beds will be available in Phase 1 and an additional 32 beds added in Phase 2, for a total of 112 beds upon completion of Phase 2 (typical, anticipated occupancy will be 80% – 90%.). As shown in **Table 2, *Proposed Project Staffing***, it is anticipated that there will be up to approximately 64 full-time employees; the table below illustrates the breakdown of employees per shift, days of the week, and per Project phase. The Wildfire Conservancy will require an additional 2 to 3 employees, for an overall total of 67 employees. There will be no seasonal employees. The Project will be operational 7 days per week, 24 hours a day, 365 days a year.

Table 2
Proposed Project Staffing

SHIFT	Phase 1A Employees	Phase 1B Additional Employees	Phase 2 Additional Employees	Total Employees
Mon – Fri - Day Shift	36	+17	+11	64
Mon – Fri - Swing Shift	13	+6	+2	21
Mon – Fri - Night Shift	5	+1	+2	8
Sat / Sun - Day Shift	15	+12	+5	32
Sat / Sun - Swing Shift	11	+6	+1	18
Sat / Sun - Night Shift	5	+1	+2	8

Existing on-site amenities, which have been in use for over 40 years include: 3 pools, 2 man-made lakes, pool house, gym, rock-climbing wall, basketball/tennis court, batting cages, barn and horse stables, and hiking trails/roads. There will be administrative offices, conference/meeting rooms, and a possible caretaker's residence. All new facilities will be constructed to meet or exceed current California Fire and Building Code requirements. The Project will serve as a demonstration for new fire suppression techniques and building construction/design. As shown in **Table 3, *Proposed Private Solar Facilities***, the Project will also include small scale, private solar panels for individual building use as part of the proposed Phase I and 2 development (i.e., the Center of Excellence and the Wildfire Conservancy). The various locations of the onsite private solar panels are shown in **Figure 4, *Site Plan***.

Table 3
Proposed Private Solar Facilities

Onsite Location	Estimated Square Feet
Private Solar 1	13,084
Private Solar 2	8,700
Private Solar 3	33,452
TOTAL	**55,236**

Source: Project Plans (**Appendix K**)

Circulation/Access/Parking

The Project will take access off of Cactus Valley Road from the west which takes access from Route R3 (Cactus Valley Road to the west and Sage Road to the south). Onsite circulation will be modified to accommodate required Fire Department Access.

Employee parking calculations are based upon one (1) parking stall per employee for peak shift. Due to the remoteness of the site, employee carpooling will be highly encouraged. Client parking calculations are based upon 1 parking stall per 4 beds. The Wildfire Conservancy will have 2-3 employees 2-4 Days per week and training events of less than 25 participants will be held once a month on weekends when the Treatment Facility parking requirements are the lowest; no additional parking is required for training events.

Due to the existing site topography, providing Americans with Disabilities Act (ADA) paths of travel between buildings and other uses on the site is not practical. In order to comply with ADA requirements, the Center for Excellence will provide ADA accessible van and golf cart shuttle service from parking areas to each building and use on the site.

Existing General Plan and Zoning Designations

The Project site is currently zoned Rural Residential (R-R). The current General Plan Land Use Designations are Rural Residential and Rural Mountainous. Surrounding zoning and land use to the north and west are Rural Residential and Rural Mountainous, respectively. Surrounding zoning and land use to the east are Rural Residential and Open Space Rural, respectively. Surrounding zoning and land use to the south are Rural Residential and Conservation Habitat, respectively. The zoning and land use designations of the site and surrounding area are delineated in **Table 4, *Land Use and Zoning Designations***. The site plan of the proposed facilities is consistent with the existing onsite zoning and General Plan land use designations. The proposed uses are also consistent and compatible with surrounding zoning and land use designations.

Table 4
Land Use and Zoning Designations

Location/ Direction	General Plan Land Use Designation	County Zoning
Project Site	Rural Residential (R-R)	Rural Residential (R-R)
North	Rural Mountainous (R-M) Rural Residential (R-R)	Rural Residential (R-R)
South	Conservation Habitat	Rural Residential (R-R)
East	Rural Residential (R-R)	Rural Residential (R-R)
West	Rural Mountainous (R-M) Rural Residential (R-R)	Rural Residential (R-R)

Source: Map My County https://gis1.countyofriverside.us/Html5Viewer/index.html?viewer=MMC_Public

Proposed General Plan and Zoning Designations

For the treatment facility (i.e., Center for Excellence), either the Residential Facility or Residential Care Facility would be the closest permitted uses allowed in the current R-R zone. The use being permitted would either be classified as a Residential Facility or Residential Care Facility as defined by the zoning. The R-R zoning would also allow the wildfire research facility (i.e., Wildfire Conservancy) to be permitted since it would be similar in character and intensity to other uses permitted in the zone.

Therefore, the proposed treatment and research facilities are consistent with the existing zoning and General Plan land use designations for the site. In addition, they are of low intensity and would be compatible with surrounding zoning and General Plan land use designations (e.g., Rural Mountainous, Open Space Rural, and Conservation Habitat).

Additionally, the information provided below demonstrates compliance with the definitions and provisions of an Alcohol or Drug Abuse Treatment Facility and/or other type of Community Care Facility to further

confirm that it may be permitted in the proposed R-R zone. (It should also be noted that outpatient services are not typically a part of the treatment options and would have a negligible impact on the operation.)

In accordance with California Health and Safety Code Division 10.5, Part 2, Article 1, Section 11834.01, the California Department of Public Health (CDPH) has the sole authority in state government to license adult alcoholism or drug abuse recovery or treatment facilities.

Section 11834.015 requires CDPH to adopt American Society of Addiction Medicine (ASAM) treatment criteria as the minimum standard of care for licensed facilities and shall require a licensee to maintain those standards with respect to the level of care to be provided by the licensee.

In accordance with ASAM Level 3.7, Medically Monitored Intensive Inpatient Services Withdrawal Management for adults, this level of care provides 24-hour nursing care with a physician's availability for significant problems in Dimensions 1, 2, or 3. Patients in this level of care require medication and have a recent history of withdrawal management at a less intensive level of care, marked by past and current inability to complete withdrawal management and enter into continuing addiction treatment. This is the appropriate setting for patients with subacute biomedical and emotional, behavioral, or cognitive problems that are so severe that they require inpatient treatment. Level 3 encompasses residential services that are described as co-occurring capable, co-occurring enhanced, and complexity capable services, which are staffed by designated addiction treatment, mental health, and general medical personnel who provide a range of services in a 24-hour treatment setting. in association with these services, CDPH requires each provider to be certified to provide Incidental Medical Services per Section 11834.025.

Section 11834.026 defines Incidental Medical Services (IMS) as services that are in compliance with the community standard of practice and are not required to be performed in a licensed clinic or licensed health facility to address medical issues associated with either detoxification from alcohol or drugs or the provision of alcoholism or drug abuse recovery or treatment services. IMS includes all of the following categories of services that the department shall further define by regulation:

- Obtaining medical histories
- Monitoring health status to determine whether the health status warrants transfer of the patient in order to receive urgent or emergent care.
- Testing associated with detoxification from alcohol or drugs.
- Providing alcoholism or drug abuse recovery or treatment services.
- Overseeing patient self-administered medications.
- Treating substance abuse disorders, including detoxification.

IMS does not include the provision of general primary medical care (See Sec. 11834.026). In fact, the California Health and Safety Code specifically states that "a facility licensed and approved by the department to allow provision of incidental medical services shall not by offering approved incidental medical services be deemed a clinic or health facility" (Sec. 11845(e)).

Incidental medical services shall include treatment medications prescribed by properly licensed medical staff. The storage, administration, and disposal of all medications shall comply with federal, state, and local regulations. At no time shall any medications be disposed of through the Onsite Waste Treatment System.

In other words, IMS are required as part of the licensed treatment and will be provided in accordance with California Health and Safety Code and Department of Health requirements, but do not appear to constitute what you describe as "medical services" that would require treatment by a medical clinic or health facility.

Circulation

The Project will take access off of Cactus Valley Road, which takes access from route R3 (Cactus Valley Road to the west and Sage Road to the south). It is anticipated that circulation will remain the same as that which currently exists on the site.

Grading

The new facilities will be constructed in relatively flat areas in the southern portions of the site that have been previously disturbed, therefore minimal grading is expected. Approximately 9.62 acres of the site will be disturbed/graded with an anticipated 595 cubic yards (CY) of cut and 5,955 CY of fill which will be generated within the planned disturbance area of the Project, so earthwork is expected to be balanced onsite.

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

Total Project Area:

Residential Acres: N/A	**Lots:** N/A	**Units:** N/A	**Projected No. of Residents:** N/A
Commercial Acres: N/A	**Lots:** N/A	**Sq. Ft. of Bldg. Area:** N/A	**Est. No. of Employees:** N/A
Industrial Acres: N/A	**Lots:** N/A	**Sq. Ft. of Bldg. Area:**	**Est. No. of Employees:**
Other (Institutional): Approx. 48 acres	**Lots:** 1	**Sq. Ft. of Bldg. Area:** Existing 32,016 / New Construction 37,130	**Est. No. of Employees:** 67

A. Assessor's Parcel No(s): Portions of 569-020-024, -025, and -026 (One APN to be determined through processing of LLA210115)

B. Street References: Eastern terminus of Cactus Valley Road

C. Section, Township & Range Description or reference/attach a Legal Description: Section 8 East, Township 6 South, Range 1 East

D. Brief description of the existing environmental setting of the Project site and its surroundings:

The Project area is situated in the rolling hills and valleys east of the City of Hemet in unincorporated southwest Riverside County. The topography in the area varies considerably and is dominated by steep uplands to the east and north and less steep hills and terraces to the west and south. Elevations in the area vary considerably although the average elevation of the site is 2,237 feet above mean sea level (AMSL). The site is located in a very rural setting surrounded by large tracts of open and vacant land, punctuated by rural residences some of which support low intensity agriculture or ranching. Onsite soils have been disturbed by construction of previous ranch facilities. Reference **Figure 2, *Vicinity Map.***

The CUP Parcel is located in the southeastern portion of the San Jacinto Valley Area Plan (SJVAP) within the southeastern portion of Subunit 5 – Mica Butte (SU5). The western portion of the CUP Parcel is situated within the southern portion of Cell Group J' and the eastern portion was within the southern portion of Cell Group L'. A Reserve Assembly Analysis determined that Cell Group J' exceeds the targeted Additional Reserve Land (ARL) goals, and that Cell Group L' has the land available to meet the targeted ARL goal without the inclusion of the CUP Parcel.

Four features were present within the CUP Parcel that potentially meet the criteria of a MSHCP Section 6.1.2 Riparian/Riverine Area. The Project will avoid impacts to the four potential Riparian/Riverine Areas.

The CUP Parcel is located within an assessment area for Los Angeles pocket mouse (LAPM). Discussions on potentially suitable habitat for LAPM and focused surveys performed are provided in Section 7, Biological Resources.

The site and surrounding region are within the South Coast Air Basin and under the jurisdiction of the South Coast Air Quality Management District. There are no onsite faults, but the region contains a number of active faults including the San Andreas and San Jacinto Fault Zones. There are no onsite drainages. The region was occupied by local Native American tribes for thousands of years before European contact.

II. APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

A. General Plan Elements/Policies:

1. **Land Use:** Proposed uses in Project Phases 1 and 2 are consistent with the R-R Zone and will be consistent with the Riverside Extended Mountain Area Plan (REMAP) and other applicable land use policies within the General Plan. In particular, Policies LU 2.1, LU 3.1, LU 12.1, LU 21.1, and LU 21.2 are implemented by this Project.

2. **Circulation:** Adequate circulation facilities exist to serve the Project. The proposed Project meets with all other applicable circulation policies of the General Plan. In particular, Policies C 2.3 and C 4.6 are implemented by this Project.

3. **Multi-purpose Open Space:** The Project is adjacent to open space lands but does not contain any habitat for listed or otherwise sensitive species, riparian/riverine areas, natural drainages, or other important biological resources under the MSHCP. The proposed Project meets with all other applicable Multipurpose Open Space element policies. Policies OS 3.2, OS 3.4, and OS 3.6 have been implemented in this Project.

4. **Safety:** The proposed Project is not located within a flood plain, is in a subsidence susceptible area, has a moderate risk of liquefaction, is not in a fault zone, but is in a very high fire area. The proposed Project has allowed for sufficient provision of emergency response services to the Project through the Project design and payment of development impact fees. The proposed Project meets with all other applicable Safety Element policies. Policies S 1.1 and S 5.1 are implemented through the Project.

5. **Noise:** Sufficient mitigation against any foreseeable noise sources in the area have been provided for in the design of the Project. The Project is not expected to result in 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 general plan or noise ordinance, or applicable standards of other agencies. Noise mitigation will mainly be achieved with the distance between activity areas and the nearest neighbors. The Project meets all other applicable Noise Element Policies. In particular, policies N 2.3, N 3.5, N4.4, N 14.1 are implemented by this Project.

6. **Housing:** Although there will be temporary patients and guests staying on the site, the proposed Project will create no housing, so this does not apply.

7. **Air Quality:** The proposed Project is a relatively low intensity institutional use and has been conditioned to control any fugitive dust during grading and construction activities. The proposed Project meets all other applicable Air Quality element policies. In particular, policy 2.1 is implemented by the Project.

8. **Healthy Communities:** The Project meets all applicable policies of the Healthy Communities Element of the General Plan. This Project is relatively unique in its use of land and its facilities; however, policies HC3.3 and HC 4.2 are applicable to the Project.

B. General Plan Area Plan(s): Riverside Extended Mountain Area Plan (REMAP)

C. Foundation Component(s): Rural

D. Land Use Designation(s): Rural Residential (R-R)

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

F. Policy Area(s), if any: None

G. Adjacent and Surrounding:

1. **General Plan Area Plan(s):** REMAP

2. **Foundation Component(s):** Rural

3. **Land Use Designation(s):** Rural Residential and Rural Mountainous

North: Rural Mountainous
South: Conservation Habitat
East: Open Space Rural
West: Rural Mountainous

Reference **Figure 5, *General Plan Land Use Designations***

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

5. **Policy Area(s), if any:** None

H. Adopted Specific Plan Information

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

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

I. Existing Zoning: Rural Residential (R-R)

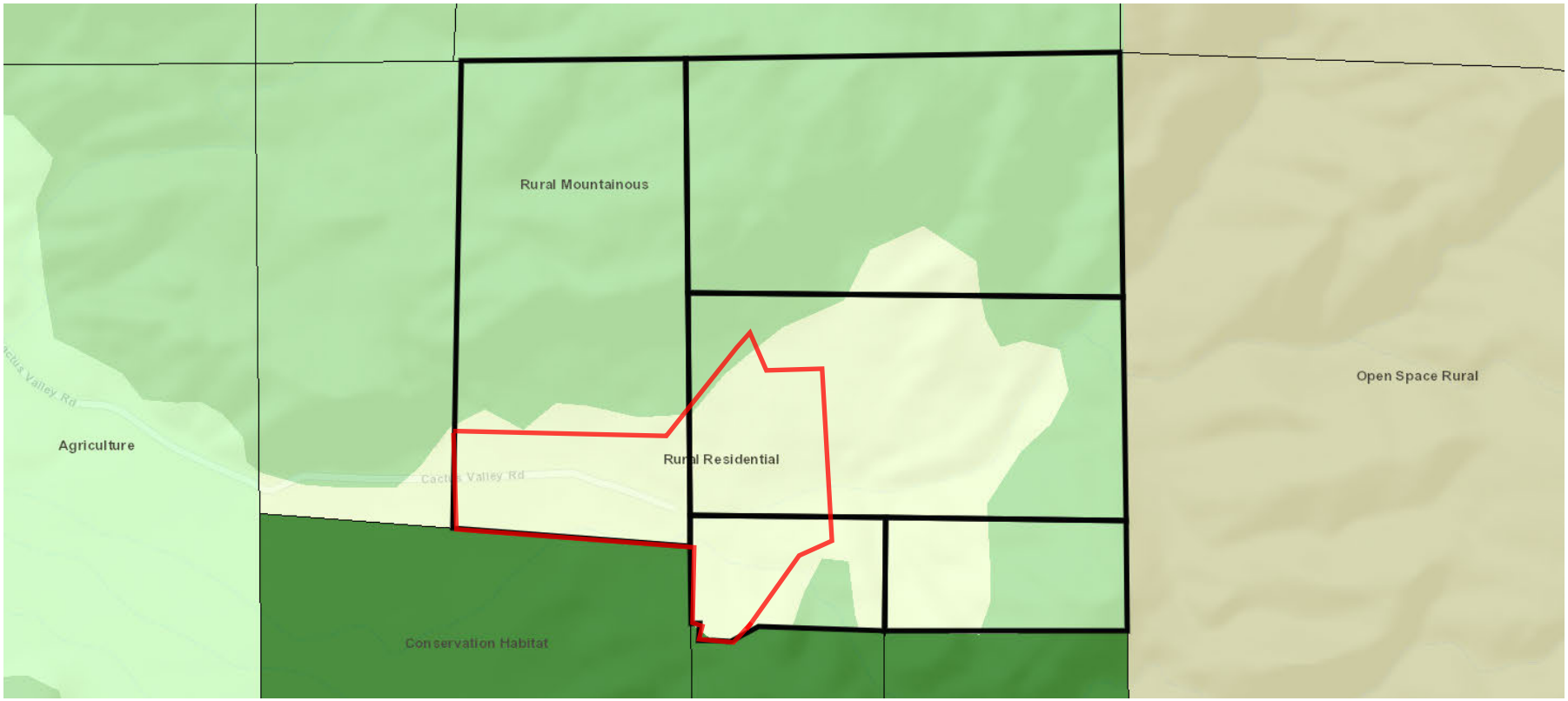
J. Proposed Zoning, if any: NA

K. Adjacent and Surrounding Zoning:

North: Rural Residential (R-R)
South: Rural Residential (R-R)
East: Rural Residential (R-R)
West: Rural Residential (R-R)

Reference **Figure 6, *Zoning Classifications***

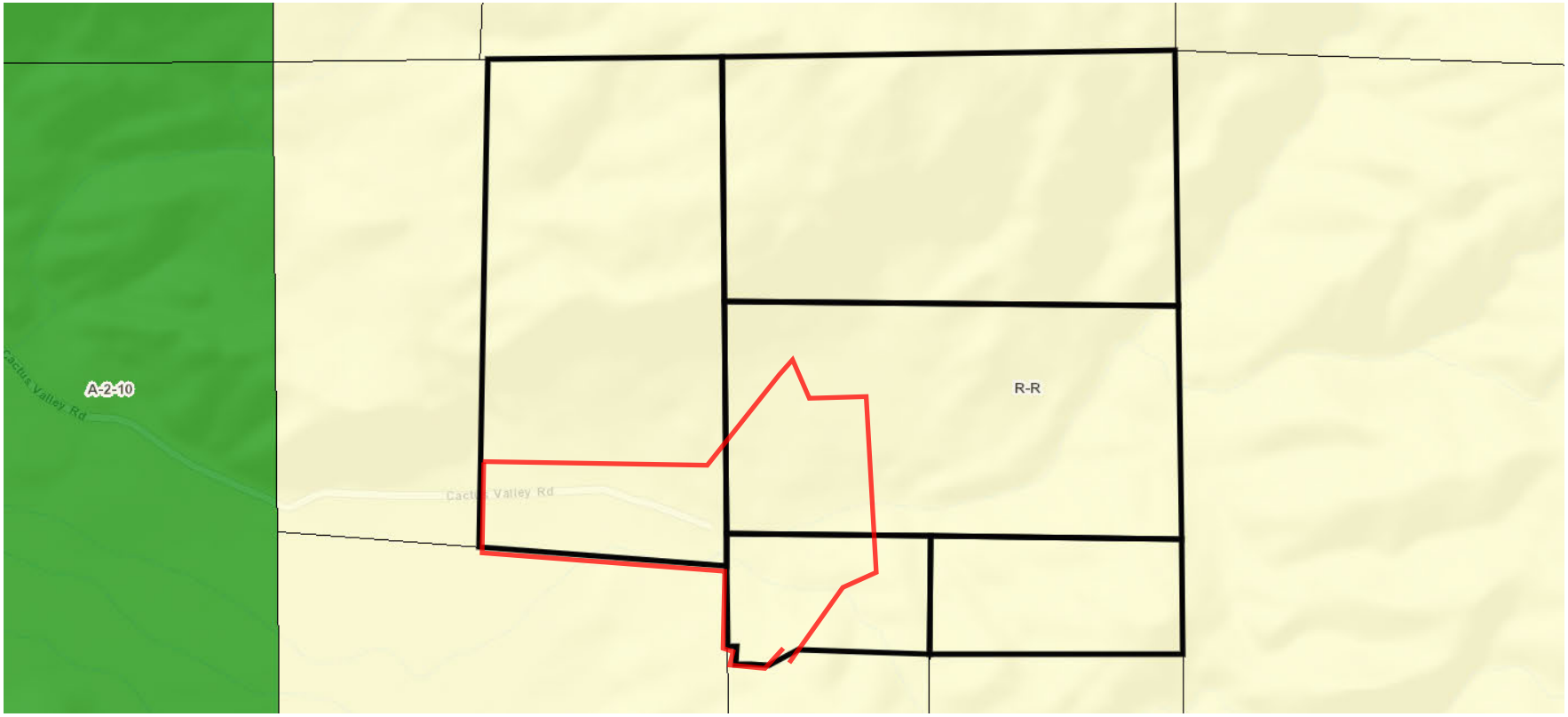
FIGURE 5
General Plan Land Use Designations



Source: Map My County https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public

Note: Red parcel lines added by MFCS, Inc, and indicate the approximately 48-acre CUP Parcel Project Site (LLA210115)

FIGURE 6
Zoning Classifications



Source: Map My County https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public

Note: Red parcel lines added by MFCS, Inc, and indicate the approximately 48-acre CUP Parcel Project Site (LLA210115)

A-2-10: HEAVY AGRICULTURE - 10 ACRE PARCELS

R-R: RURAL RESIDENTIAL

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

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.

Evan Langan — *10/17/22*

Signature — Date

Evan Langan, AICP, Principal Planner — For: John E. Hildebrand, Planning Director

Printed Name

V. ENVIRONMENTAL ISSUES ASSESSMENT

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

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

Source(s): *Map My County* (**Appendix A**); **Figure 5, *General Plan Land Use Designations***, included in Section I of this IS; Riverside County General Plan, San Jacinto Valley Area Plan (SJVAP) – Table 2: *Statistical Summary of the San Jacinto Valley Area Plan*, and Figure 9, *San Jacinto Valley Area Plan Scenic Highways*; Project Plans (**Appendix K**); and Drone Photos, prepared by Searl Biological Services, 12-3-2020 (**Appendix L**).

Findings of Fact:

Aesthetics generally refer to the identification of visual resources, the quality of one's view, and/or the overall visual perception of the environment. The issue of light and glare is related to both the creation of daytime glare due to the reflection of the sun (such as on glass surfaces) and/or an increase in nighttime ambient lighting levels (such as from building lights, streetlights, and vehicle headlights).

The Project site is located within the San Jacinto Valley Area Plan (SJVAP), one of nineteen (19) planning areas within the County of Riverside's General Plan. The SJVAP is situated in the northeast portion of Southwest Riverside County approximately eight (8) miles east of Interstate-215 (I-215) and bisected east to west by State Route-74 (SR-74) the principal access route. The planning area includes the entire City of San Jacinto and most of the City of Hemet, in addition to extensive unincorporated rural, semi-rural, agricultural and open-space lands.

The SJVAP Land Use Plan has been adopted to maintain the predominantly rural, agrarian and open space character of the unincorporated portions of the San Jacinto Valley and to focus growth on ways that respect the existing urban fabric, slopes, and natural hazard considerations.

The Project site includes two General Plan land use designations, Rural Residential (RR), which generally applies to the level areas, and Rural Mountainous (RM), which applies to the moderately sloping areas. The Project site is mostly surrounded by large expanses of vacant lands with a combination of RM, Open Space - Rural (OS-R), and Open Space - Conservation Habitat (OS-CH) general plan land use designations.

a) *Would the Project have a substantial effect upon a scenic highway corridor within which it is located?*

No Impact

The Project site is located in the northeast portion of Southwest Riverside County within the San Jacinto Valley Area Plan (SJVAP). According to the SJVAP, there are five (5) highways in the planning area that have been designated as either State or County Eligible Scenic Highways:

- The Ramona Expressway, Gilman Springs Road, State Route 79 (SR-79; Sanderson Avenue / Beaumont Avenue), and Soboba Road are all designated as County Eligible Scenic Highways; and
- State Route 74 (SR-74; Florida Avenue) as it extends east-west through the entire planning area is designated as a State Eligible Scenic Highway.

The Project site is located approximately 13½ miles southeast of SR-79 / Sanderson Avenue / Beaumont Avenue, approximately 11¼ miles southeast of Gilman Springs Road, approximately 9½ miles southwest of the Ramona Expressway, approximately 6¾ miles south of Soboba Road, and approximately 5¼ miles south of SR-74, at their closest points. The Project site is not located proximate to any of these five (5) designated scenic highways.

Based on the above information, the Project will not be visible from any of the highways because of the Project's distance from the highways and will have no environmental impact to aesthetics. Impacts will be less than significant, and no mitigation is required.

Therefore, implementation of the Project would not have a substantial effect upon a scenic highway corridor within which it is located. There would be no impact.

b) *Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?*

Less Than Significant Impact

The Project site is located in an unincorporated rural area of southwest Riverside County identified in the *Map My County* as the community of Diamond Valley, approximately five (5) miles east of Diamond Valley Lake. More specifically, the Project site is located at the northeast end of Cactus Valley nestled in the foothills (Santa Rosa Hills, just south/southeast ±1½ miles of Polly Butte) of the San Jacinto Mountains that rise to the northeast. The site is located at the terminus of Cactus Valley Road.

Cactus Valley Road is a paved two-lane rural roadway (soft shoulders) as it extends approximately 1¼ mile east from State Street to its intersection with Sage Road (R3), which extends north/south providing access to and from the unincorporated rural community of Sage to the south. Cactus Valley Road continues as a paved public right-of-way for 1¼ mile east of Sage Road, serving a relatively limited number of improved rural agriculture and rural-residential properties, before veering north across an unnamed blue-line stream and continuing another 1¼ mile east/southeast as a private unimproved dirt easement-road terminating at the Project site.

Most of the undulating, modestly sloping areas on the north side of the onsite access road and surrounding the Silverado House complex (Facility 1) have been disturbed by past activities.

With the exception of various cut graded dirt access roads, trails, and several graded, but unimproved pad areas, the balance of the site comprised of moderate to rugged slopes is in a natural and generally pristine condition.

Project site elevations generally range from 1,970 to 2,460 feet above mean sea level (AMSL). The access road ranges from approximately 1,970 to 1980 feet AMSL, while the Silverado House Complex area varies from approximately 2,020 to 2,040 feet AMSL. The highpoint (2,460' AMSL) is located along the northern Project site boundary, followed by the 2,340 foot AMSL peak at the southeast corner of the site.

An unnamed blueline stream extending southwest from Brown Canyon and a second unnamed blueline stream extending northwest through the southern boundary join at the location of the Project site's man-made lake before flowing west offsite.

On-site non-native vegetation is concentrated around the Silverado House complex, the Hacienda House, the Chaparral Lodge and the Ponderosa Lodge areas. The non-native vegetation includes the grass recreation area just south of the Hacienda House and a variety of mature trees in the vicinity of the building structures.

According to the *Map My County – Parcel Report*, the Project site is located within the Agriculture Mapping Unit, the Brittlebush-California Buckwheat Mapping Unit, the Chamise - Coastal Sage Scrub Disturbance Mapping Unit, the Coast Live Oak – Sycamore Riparian Mapping Unit, the Vacant (Disturbed Bare Ground, <2% Vegetative Cover) Mapping Unit, the California Annual Grassland Alliance, and Chamise – Hoaryleaf Ceanothus Alliance areas. The native vegetation is concentrated in the rugged sloping and riparian areas.

As previously discussed, the Project would remodel the existing improvements and add two new structures proximate to the existing facilities. Implementation of the Project would not impact the existing non-disturbed portions of the site which include rock outcroppings and sensitive riparian areas.

Due to the isolated location and topography of the Project site, the proposed Project would not obstruct any prominent vistas, views of surrounding rural estate-residential and open space uses or result in the creation of an aesthetically offensive site open to public view.

Based on the above information, the Project will not have a significant environmental impact to aesthetics. Therefore, implementation of the proposed Project would not 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. Any impacts would be less than significant, and no mitigation is required.

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?*

Less Than Significant Impact

The Project site is located in a non-urbanized area. As discussed in Threshold 1.b, the area is primarily rural-residential, rural-agricultural, and open space in nature, as well as remote as compared to the immediate vicinity. The Project site is located on the northeast edge of Cactus Valley with a combination of flat, undulating, and moderate to rugged slopes extending upwards north and east into the Santa Rosa hills. The Project site is located within the San Jacinto Valley Area Plan (SJVAP) of the Riverside County General Plan, and the underlying land use designations are Rural Residential and Rural Mountainous. The Rural Residential designation applies to the level and moderately undulating portions of the Project site and the Rural Mountainous designation applies to the moderately to rugged sloping areas of the site. The entire site is zoned Rural-Residential.

The proposed Project is being designed in compliance with the General Plan – San Jacinto Valley Area Plan. The proposed Project would expand, but would remain generally consistent in terms of size, scale, and massing associated with the previous retreat and conference center use.

Therefore, since the expansion of the Project is consistent with size, scale, and massing of the existing facilities, and the fact that the Project is relatively isolated from public view, the Project will have a less than significant impact to the existing visual character and its surroundings. Based upon the information provided in Thresholds 1.a through 1.c, the Project will have a less than significant impact on the existing visual character or quality of public views of the site and its surroundings, and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation 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?	☐	☐	☒	☐

Source(s): *Map My County* (**Appendix A**); SJVAP, Figure 6, *SJVAP Mt. Palomar Nighttime Lighting Policy Area*; and Ordinance No. 655 (An Ordinance of the County of Riverside Regulating Light Pollution).

Findings of Fact:

a) *Would the Project interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?*

Less Than Significant Impact

According to the *SJVAP* (Figure 6, *SJVAP Mt. Palomar Nighttime Lighting Policy Area*); the Project site is located within Zone B of the designated Special Lighting Area that surrounds the Mt. Palomar Observatory. At its closest point, the Project site is approximately 21½ miles north from the Observatory.

The following policy is contained in the *SJVAP*:

- **SJVAP 8.1:** Adhere to the County of Riverside lighting requirements for standards that are intended to limit light leakage and spillage that may interfere with the operations of the Palomar Observatory.

Ordinance No. 655 was adopted by the County Board of Supervisors on June 7, 1988 and went into effect on July 7, 1988. The intent of Ordinance No. 655 is to restrict the permitted use of certain light fixtures emitting into the night sky undesirable light rays which have a detrimental effect on astronomical observation and research at the Palomar Observatory. Ordinance No. 655 contains approved materials and methods of installation, definitions, general design requirements, requirements for lamp source, and shielding, prohibitions and exceptions.

Proposed outdoor lighting sources include parking lot lights and building mounted lights. Adherence to Ordinance No. 655 is required and is a standard condition of approval; it is not considered unique mitigation pursuant to CEQA, as it applies to all development projects uniformly. Based on the above information, the Project will not have a significant environmental impact to aesthetics. Impacts will be less than significant, and no mitigation is required. With conformance to Ordinance No. 655, any impacts associated with implementation of the Project would be less than significant.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation 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?	☐	☐	☒	☐
b) Expose residential property to unacceptable light levels?	☐	☐	☒	☐

Source(s): *Map My County* (**Appendix A**); SJVAP, Figure 6, *SJVAP Mt. Palomar Nighttime Lighting Policy Area*; Ordinance No. 655; and Ordinance No. 915 (An Ordinance of the County of Riverside Regulating Outdoor Lighting); and **Figure 3, *Aerial Photo***, provided in Section I of this IS.

Findings of Fact:

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

Less Than Significant Impact

Light sources at the Project site include those associated with the existing buildings and recreational activities previously used in conjunction with the retreat and conference center use previously described herein.

New sources of light and glare associated with construction activities required to remodel and repurpose the property may occur. These additional artificial light sources are typically associated with nighttime security lighting since all exterior construction activities are limited to daylight hours in the County. In addition, workers, either arriving to the site before dawn, or leaving the site after dusk, may generate additional construction-related light sources. The amount and intensity of light anticipated from these construction sources would be modest as the lighting needed will be solely for visibility or for security of the site during the nighttime hours. Additionally, these impacts will be temporary, of short-duration, and will cease when Project construction is completed.

The proposed Project would result in a modest amount of new sources of light and glare (parking lot lights and building mounted lights) from the repurposing effort which, in addition to remodeling the existing structures, would add two new building structures identified as Facility 5 and Facility 6, as well as vehicular lighting from cars traveling along Cactus Valley Road to access the proposed Project. Once operational, the Project would be required to comply with Ordinance No. 655 and Ordinance No. 915, which restricts lighting hours, types, and techniques of lighting and requires the use of low-pressure sodium fixtures and hooded fixtures to prevent spillover light or glare.

Ordinance No. 915 requires all outdoor luminaires to be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin onto the public right-of-way. Ordinance No. 915 also prohibits blinking, flashing and rotating outdoor luminaires, with a few exceptions.

Based on the above information, the Project will have no environmental impact to aesthetics. The Project would be required to comply with the County of Riverside conditions of approval that requires lighting restrictions. These are typically standard conditions of approval and are not considered unique mitigation pursuant to CEQA. With conformance to Ordinance No. 655 and Ordinance No. 915, any impacts associated with implementation of the Project would be less than significant, and no mitigation is required.

b) Would the Project expose residential property to unacceptable light levels?

Less Than Significant Impact

The area in general is characterized by hilly and mountainous terrain to the north, east, west, and south, with valley to the southwest. Aside from single family residences on large lots, the closest residential development is located approximately 3 miles to the west. There is only one residence within an approximate 1,000 foot radius of the Project site. It is situated on a 417.3-acre parcel north of the Project site.

As discussed in Threshold 2.a., construction impacts will be temporary, of short-duration, and will cease when Project construction is completed. Once a certificate of occupancy has been issued, conformance with Ordinance No. 655, and Ordinance No. 915, will ensure that any impacts are expected to be less than significant from implementation of the Project.

Based on the above information, the Project will not have a significant environmental impact to aesthetics. Therefore, there are no potential Project-specific impacts that could expose residential

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

property to unacceptable light levels. Impacts will be less than significant, and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation 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?	☐	☐	☒	☐

Source(s): *Map My County* (**Appendix A**); Project Plans (**Appendix K**); Riverside County General Plan Figure OS-2 "Agricultural Resources"; California Department of Conservation, Farmland Mapping and Monitoring Program (DOC-FMMP) website; Google Earth website; and Ordinance No. 625 (An Ordinance of the County of Riverside Providing a Nuisance Defense for Certain Agricultural Activities, Operations, and Facilities and Providing Public Notification Thereof).

Findings of Fact:

a) *Would the Project 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?*

No Impact

According to the DOC-FMMP website and *Map My County*, the Project site is designated as Farmland of Local Importance and Other Lands. The surrounding lands have rural residential or mountainous land uses and zoning designations except for the land approximately 0.25-mile west of the Project site along both sides of Cactus Valley Road. This land is zoned Heavy Agriculture (A-2-10), but it does not appear the land is being used for any agricultural production at this time.

Implementation of the proposed Project will not convert 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. No impacts will occur.

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

Less Than Significant Impact

The current General Plan Land Use Designations for the Project site are Rural Residential and Rural Mountainous while the existing zoning designation for the entire site is Rural Residential (R-R). The zoning and General Plan land use designations for lands within the Project area are shown in **Table 4-1, *Land Use and Zoning Designations of the Project Area***.

Table 4-1
Land Use and Zoning Designations of the Project Area

Location/ Direction	General Plan Land Use Designation	County Zoning
Project Site	Rural Residential (R-R)	Rural Residential (R-R)
North	Rural Mountainous (R-M) Rural Residential (R-R)	Rural Residential (R-R)
South	Conservation Habitat	Rural Residential (R-R)
East	Rural Residential (R-R)	Rural Residential (R-R)
West	Rural Mountainous (R-M) Rural Residential (R-R)	Rural Residential (R-R)

Source: Map My County https://gis1.countyofriverside.us/Html5Viewer/index.html?viewer=MMC_Public

The land approximately 0.25-mile west of the Project site along both sides of Cactus Valley Road is zoned Heavy Agriculture (A-2-10) but it does not appear the land is being used for any agricultural production at this time.

The Project does not propose to install or operate any actual agricultural activities on the site, so it will have no effect on agricultural production in the County. The R-R zoning would allow the treatment facility (i.e., Center for Excellence) and the wildfire research facility (i.e., Wildfire Conservancy) to be permitted since they would be similar in character and intensity to other uses permitted in the zone. The proposed treatment and research facilities are consistent with the existing zoning and General Plan land use designations for the site, and no change of zone is needed or proposed, including any agricultural zones. Therefore, implementation of the proposed Project will not conflict with existing agricultural zoning or agricultural use. Impacts will be less than significant.

The Project site is not subject to a Williamson Act contract, and it is not within a Riverside County Agriculture Preserve. No impacts will occur.

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

Less Than Significant Impact

The Project proposes to develop new structures on the Paradise Valley Ranch property and repurpose the site into the west coast "Center of Excellence" for firefighter mental and behavioral health and research/training site for the Wildfire Conservancy. As discussed under Threshold 4.b,

the land approximately 0.25-mile west of the Project site along both sides of Cactus Valley Road is zoned Heavy Agriculture (A-2-10) but it does not appear the land is being used for any agricultural production at this time. In any case, the eastern boundary of this zoned property is over 1,000 feet west of the Project site. The Project would increase human activity on the site which would result in incremental increases in area traffic, noise, etc., but there are no agricultural properties within 300 feet of the Project site.

Based on the analysis above, the Project would not introduce any non-agricultural uses within 300 feet of agriculturally zoned property as they relate to Ordinance No. 625 ("Right-to-Farm"). Any impacts will be less than significant, and no mitigation is required.

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

Less Than Significant Impact

As discussed under Thresholds 4.b and 4.c, the Project proposes to develop new structures on the Paradise Valley Ranch property and repurpose the site into the west coast "Center of Excellence" for firefighter mental and behavioral health and research/training site for the Wildfire Conservancy. The Project would increase human activity on the site which would result in incremental increases in area traffic, noise, etc. However, there is a 100-foot wide parcel of land zoned Rural Residential (R-R) just west of the Project site which would act as a "buffer" against any potential conversion of the land zoned A-2-10 (Heavy Agriculture) further west of the site.

There are no farms or active farmland in the surrounding area so it is unlikely that implementation of any phase of the proposed Project will involve changes in the existing environment which could result in conversion of farmland to non-agricultural use. Any impacts will be less than significant, and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation 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?	☐	☐	☐	☒

Source(s): *Map My County* (**Appendix A**); **Figure 3, *Aerial Photo***, provided in Section I of this IS; California Department of Forestry and Fire Protection (CALFIRE), Fire and Resource Assessment Program (FRAP) website; and Project Site Visit – March 2021 by Matthew Fagan.

Findings of Fact:

a) Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?

No Impact

Public Resources Code Section 12220(g) identifies forest land as:

> "*Land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.*"

The Project site and surrounding properties are not currently being defined, zoned, managed, or used as forest land as identified in Public Resources Code Section 12220(g). No impacts will occur. In addition, the CALFIRE Fire and Resource Assessment Program (FRAP) website does not indicate the Project area contains any identified forest resources. Therefore, no impacts will occur from Project development, and no mitigation is required.

b) Would the Project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact

As discussed in Threshold 5.a, there is no forest land on the Project site or surrounding properties. Therefore, there will be no loss of forest land or conversion of forest land to non-forest use as a result of the Project. Therefore, no impacts will occur from Project development, and no mitigation is required.

c) Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?

No Impact

As discussed in Thresholds 5.a and 5.b, the Project site and surrounding areas do not contain any identified forest resources. Therefore, the Project would not result in any changes in the existing environment which could result in conversion of forest land to non-forest use. Therefore, no impacts will occur from Project development, and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AIR QUALITY Would the Project:				
6. Air Quality Impacts a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Source(s): *Paradise Valley Ranch Air Quality and Greenhouse Gas Impact Study County of Riverside,* prepared by RK Engineering Group, Inc., 7-23-2021 (*AQ/GHG Study*, **Appendix B**).

Note: Any tables or figures in this section are from the *AQ/GHG Study*, unless otherwise noted.

Findings of Fact:

a) Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact

CEQA requires a discussion of any inconsistencies between a proposed Project and applicable General Plans and Regional Plans (CEQA Guidelines Section 15125). The regional plan that applies to the proposed Project includes the South Coast Air Quality Management District's (SCAQMD) - Air Quality Management Plan (AQMP). Therefore, this section discusses any potential inconsistencies between the proposed Project and the referenced AQMP.

The purpose of this discussion is to set forth the issues regarding consistency with the assumptions and objectives of the AQMP and to analyze whether the proposed Project would interfere with the region's ability to comply with Federal and State air quality standards. If the decision-makers determine that the proposed Project is inconsistent, the lead agency may consider project modifications or inclusion of mitigation measures to eliminate the inconsistency.

The SCAQMD CEQA Handbook states:

> "New or amended General Plan Elements (including land use zoning and density amendments), Specific Plans, and significant Projects must be analyzed for consistency with the AQMP".

Strict consistency with all aspects of the AQMP is usually not required. A project should be considered consistent with the AQMP if it furthers one or more policies and does not obstruct other policies.

The SCAQMD CEQA Handbook identifies two key indicators of consistency:

1. Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP; and
2. Whether the project will exceed the assumptions in the AQMP in 2016 or increments based on the year of project buildout and phase.

Criterion 1 - Increase in the Frequency or Severity of Violations

The results of the short-term construction emission levels and long-term operational emission levels show that the Project would not result in significant impacts based on the SCAQMD regional and local thresholds of significance. Therefore, the proposed Project would not contribute to the exceedance of an air pollutant concentration standard and is found to be consistent with the AQMP for the first criterion.

Criterion 2 - Exceed Assumptions in the AQMP

Consistency with the AQMP assumptions is determined by performing an analysis of the proposed Project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the proposed Project are based on the same forecasts as the AQMP.

The 2016-2040 Regional Transportation/Sustainable Communities Strategy, prepared by the Southern California Association of Governments (SCAG) in 2016, includes chapters on the following issues:

- Challenges in a Changing Region;
- Creating a plan for our future; and
- The Road to Greater Mobility and Sustainable Growth.

These chapters currently respond directly to federal and state requirements placed on SCAG. Local governments are required to use these as the basis of their plans for purposes of consistency with applicable regional plans under CEQA.

The Project consists of the redevelopment of an existing use and will, in many respects, continue to function as it has for the last 40 years. Any increase in the amount of operational emissions, beyond what was previously occurring at the site, is considered less than significant, as outlined in the regional and local emissions analysis in Threshold 6.b. As a result, the Project will not significantly increase emissions compared to what is currently allowed and projected in the AQMP for this region. Therefore, the Project is found to be consistent with the AQMP for the second criterion.

Based on the analysis above, the Project will not conflict with, or obstruct implementation of the applicable air quality plan. Any impacts will be less than significant, and no mitigation is required.

b) Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact

The Project site is located in the South Coast Air Basin. It is noted, state and federal air quality

standards are often exceeded in many parts of the SCAB. **Table 6-1, *South Coast Air Basin Attainment Status***, lists the attainment status for the criteria pollutants in the South Coast Air Basin (SCAB).

Table 6-1
South Coast Air Basin Attainment Status[1]

Pollutant	State Status	National Status
Ozone	Nonattainment	Nonattainment (Extreme)[2]
Carbon monoxide	Attainment	Attainment (Maintenance)
Nitrogen dioxide	Attainment	Attainment (Maintenance)
PM_{10}	Nonattainment	Attainment (Maintenance)
$PM_{2.5}$	Nonattainment	Nonattainment
Lead	Attainment	Nonattainment (Partial)[3]

[1] Taken from California Air Resources Board http://www.arb.ca.gov/desig/adm/adm.htm
[2] 8-Hour Ozone
[3] Partial Nonattainment designation – Los Angeles County portion of Basin only

A discussion of the Project's potential short-term construction impacts, and long-term operational impacts is provided below.

Construction Emissions

The following discussion sets forth the methodology used to calculate regional construction air emissions and an analysis of the proposed Project's short-term construction emissions for the criteria pollutants.

Methodology

Construction of the Project is estimated to begin in the year 2020 and expected to last approximately 18 months. The Project is expected to be fully operational by the year 2021. Construction activities are expected to consist of site preparation, grading, building construction, paving, and architectural coating. Construction activities are based on CalEEMod defaults. The construction schedule represents a "worst-case" analysis scenario, should construction occur any time after the respective dates, since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.

The CalEEMod default construction equipment list is based on survey data and the size of the site. The parameters used to estimate construction emissions, such as the worker and vendor trips and trip lengths, utilize the CalEEMod defaults. The CalEEMod default construction equipment list is shown in **Table 6-2, *Construction Equipment Assumptions Phase***.

Table 6-2
Construction Equipment Assumptions Phase[1]

Phase	Equipment	Amount	Hours Per Day[1]	Soil Disturbance Rate (Acres/8hr-Day)[2]	Equipment Daily Disturbance Footprint (Acres)	Total Phase Daily Disturbance Footprint (Acres)
Site Preparation	Rubber Tired Dozers	3	8	0.5	1.5	3.5
	Tractors/Loaders/Backhoes	4	8	0.5	2.0	
Grading	Excavators	2	8	0.0	0.0	4.0
	Graders	1	8	0.5	0.5	
	Rubber Tired Dozers	1	8	0.5	0.5	
	Scrapers	2	8	1.0	2.0	
	Tractors/Loaders/Backhoes	2	8	0.5	1.0	
Building Construction	Cranes	1	7	0.0	0.0	1.3
	Forklifts	3	8	0.0	0.0	
	Generator Sets	1	8	0.0	0.0	
	Tractors/Loaders/Backhoes	3	7	0.5	1.3	
	Welders	1	8	0.0	0.0	
Paving	Pavers	2	8	0.0	0.0	0.0
	Paving Equipment	2	8	0.0	0.0	
	Rollers	2	8	0.0	0.0	
Architectural Coating	Air Compressors	1	6	0.0	0.0	0.0

[1] CalEEMod Defaults.
[2] Soil disturbance rates are based on the SCAQMD Fact Sheet for Applying CalEEMod to Localized Significance Thresholds.

The quantity of fugitive dust estimated by CalEEMod is based on the pieces of equipment used during and grading. CalEEMod estimates the worst-case fugitive dust impacts will occur during the grading phase. The maximum daily disturbance footprint would be 4.0 acres per 8-hour day with all equipment in use.

Air Quality Regional Significance Thresholds

The SCAQMD has established air quality emissions thresholds for criteria air pollutants for the purposes of determining whether a project may have a significant effect on the environment per Section 15002(g) of the CEQA Guidelines. By complying with the thresholds of significance, the

Project would be in compliance with the SCAQMD Air Quality Management Plan (AQMP) and the federal and state air quality standards.

Table 6-3, *SCAQMD Regional Significance Thresholds*, lists the air quality significance thresholds for the six criteria air pollutants analyzed in this section. Lead is not included as part of this analysis as the Project is not expected to emit lead in any significant measurable quantity.

Table 6-3
SCAQMD Regional Significance Thresholds

Pollutant	Construction (lbs./day)	Operation (lbs./day)
NO_X	100	55
VOC	75	55
PM_{10}	150	150
$PM_{2.5}$	55	55
SO_X	150	150
CO	550	550

Regional Air Quality Impacts from Construction

Regional air quality emissions include both on-site and off-site emissions associated with construction of the Project. Regional daily emissions of criteria pollutants are compared to the SCAQMD regional thresholds of significance. The Project must follow all standard SCAQMD rules and requirements with regards to fugitive dust control, as well as other construction-related emissions as described in **Project Design Features AQ/GHG-DF-1** through **AQ/GHG-DF-12**. Compliance with **Project Design Features AQ/GHG-DF-1** through **AQ/GHG-DF-12** are considered standard requirements, are included as part of the Project's design features, and are not unique mitigation under CEQA.

Table 6-4, *Regional Construction Emissions* shows that the Project's daily construction emissions will be below the applicable SCAQMD regional air quality standards and thresholds of significance. As a result, the Project would not contribute substantially to an existing or projected air quality violation. Furthermore, by complying with the SCAQMD standards, the Project would not contribute to 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Table 6-4
Regional Construction Emissions

Maximum Daily Emissions (lbs./day)[1]						
Activity	**VOC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Site Preparation	3.99	40.56	22.03	0.04	9.23	5.75
Grading	4.31	46.47	31.85	0.06	5.61	3.28
Building Construction	8.47	56.44	68.91	0.27	18.08	5.61
Paving	1.19	11.17	15.25	0.02	0.90	0.58
Architectural Coating	46,53	2.03	10.27	0.03	2.94	0.85
Maximum[1]	**46.53**	**56.44**	**68.91**	**0.27**	**18.08**	**5.75**
SCAQMD Threshold	75.0	100.0	550.0	150.0	150.0	55.0
Exceeds Threshold (?)	**No**	**No**	**No**	**No**	**No**	**No**

[1] Maximum daily emissions during summer or winter; includes both on-site and off-site Project emissions.

As shown in **Table 6-4**, regional construction daily emissions of criteria pollutants are expected to be below the allowable thresholds of significance for all criteria pollutants. Therefore, Project impacts would be less than significant.

Operational Emissions

Operational emissions occur over the life of the Project and are considered "long-term" sources of emissions. Operational emissions include both direct and indirect sources (mobile source emissions, energy source emissions, areas source emissions and other source emissions). Operational activities associated with the proposed Project will result in emissions of volatile organic compounds (VOC), nitrogen oxide (NO_x), carbon (CO), oxides of sulfur (SO_x), respirable particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$). Operational emissions would be expected from the following primary sources:

- Mobile Source Emissions;
- Area Source Emissions; and
- Energy Source Emissions.

Mobile source emissions are from motor vehicles and are the largest single long-term source of air pollutants from the operation of the Project. Emissions are also generated from *area sources* such as the consumption of natural gas for heating, hearths, landscaping equipment, consumer product usage, and architectural coatings (painting). *Energy source emissions* typically occur off-site at a power plant and are considered an indirect source of emissions. Energy source emissions are mainly used for estimating GHG's.

Long-term operational air pollutant impacts from the Project are shown in **Table 6-5, *Regional Operational Emissions***.

Table 6-5
Regional Operational Emissions

Maximum Daily Emissions (lbs./day)[1]						
Activity	**VOC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Mobile Sources	0.50	3.83	7.58	0.03	2.64	0.72
Energy Sources	0.01	0.08	0.04	0.00	0.01	0.01
Area Sources	1.55	0.12	0.71	0.00	0.01	0.01
Total[1]	**2.06**	**4.03**	**8.33**	**0.03**	**2.66**	**0.74**
SCAQMD Threshold	55.0	55.0	550.0	150.0	150.0	55.0
Exceeds Threshold (?)	**No**	**No**	**No**	**No**	**No**	**No**

[1] Maximum daily emissions during summer or winter.

The maximum daily emissions analyzed in **Table 6-5** include both on-site and off-site Project emissions. The Project's daily operational emissions will be below the applicable SCAQMD regional air quality standards and thresholds of significance, and the Project would not contribute substantially to an existing or projected air quality violation.

With adherence to **Project Design Features AQ/GHG-DF-13** through **AQ/GHG-DF-17**, the Project will not 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. Any impacts will be less than significant, and no mitigation is required.

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

Less Than Significant Impact

Localized Construction Analysis Modeling Parameters

CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily disturbance activity possible for each piece of equipment. The *AQ/GHG Study* identifies the following parameters in the Project Design Features or applicable mitigation measures in order to compare CalEEMod reported emissions against the localized significance threshold lookup tables:

- The off-road equipment list (including type of equipment, horsepower, and hours of operation) assumed for the day of construction activity with maximum emissions.
- The maximum number of acres disturbed on the peak day.
- Any emission control devices added onto off-road equipment.
- Specific dust suppression techniques used on the day of construction activity with maximum emissions.

Air quality emissions were analyzed using the SCAQMD's Mass Rate Localized Significant Threshold (LST) Look-up Tables. **Table 6-6, *SCAQMD Localized Significance Thresholds (LST)***, lists the Localized Significance Thresholds (LST) used to determine whether a project may generate significant adverse localized air quality impacts. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard. LSTs are developed based on the ambient concentrations of four applicable air pollutants for source receptor area (SRA) 26 – Temecula Valley.

The nearest existing sensitive receptors are residential uses located to the west, over a thousand feet from the western property line of the project site. However, to be conservative the analysis uses the most stringent 25-meter thresholds for localized emissions from any potential area of construction or operational activity. SCAQMD LST methodology states that projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters. **Table 6-7, *Localized Construction Emissions*,** illustrates the construction related localized emissions and compares the results to SCAQMD LST thresholds.

Table 6-6
SCAQMD Localized Significance Thresholds[1] (LST)

Pollutant	Construction (lbs./day)	Operational (lbs./day)
NO_X	363.0	363.0
CO	2,781.0	2,781.0
PM_{10}	38.0	10.0
$PM_{2.5}$	10.0	3.0

[1] SCAQMD Mass Rate Localized Significance Thresholds for 4-acre site in SRA-26 at 25 meters.

The daily disturbance area is calculated to be 4 acres, however LST thresholds are only based on 1, 2, and 5-acre sites. In order to be conservative, a linear progression model was used to estimate the threshold for 4-acre site based on the established LST thresholds.

Table 6-7
Localized Construction Emissions

Maximum Daily Emissions (lbs./day)[1]				
Activity	**NOx**	**CO**	**PM_{10}**	**$PM_{2.5}$**
On-site Emissions	46.40	30.88	8.95	5.68
SCAQMD Construction Threshold[2]	363.0	2,781.0	38.0	10.0
Exceeds Threshold (?)	**No**	**No**	**No**	**No**

[1] Maximum daily emissions during summer or winter.
[2] Reference LST thresholds are from 2006-2008 SCAQMD Mass rate Localized Significant Thresholds for construction and operation. Source Receptor Area 26 (Temecula Valley), 4-acre site, receptor distance 25 meters.

As shown in **Table 6-7**, the emissions will be below the SCAQMD thresholds of significance for localized construction emissions. The Project must follow all SCAQMD rules and requirements with regards to fugitive dust control, as well as other construction-related emissions, as contained in **Project Design Features AQ/GHG-DF-1** through **AQ/GHG-DF-12**. Compliance with **Project**

Design Features AQ/GHG-DF-1 through **AQ/GHG-DF-12** are considered standard requirements and are not considered unique mitigation under CEQA. The Project's short-term construction impact to localized air resources is less than significant.

Diesel Particulate Matter – Construction

The greatest potential for toxic air contaminant emissions from the Project would be related to diesel particulate matter (DPM) emissions associated with heavy diesel equipment used during construction. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk". "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 30-year lifetime will contract cancer, based on the use of standard risk-assessment methodology.

As shown in **Table 6-5, *Regional Construction Emissions,*** and in **Table 6-7, *Localized Construction Emissions***, construction-based particulate matter (PM) emissions (including diesel exhaust emissions) do not exceed regional or local thresholds. Given the short-term construction schedule, the proposed Project's construction activity is not expected to be a long-term (i.e., 30 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk and a health risk assessment is not warranted.

In September 2000, the CARB adopted the Diesel Risk Reduction Plan, which recommends several control measures to reduce the risks associated with DPM. The key elements of the Plan are to clean up existing engines through engine retrofit emission control devices, to adopt stringent standards for new diesel engines, to lower the sulfur content of diesel fuel, and implement advanced technology emission control devices on diesel engines.

In order to ensure the level of DPM exposure is reduced as much as possible, the Project shall implement the best available pollution control strategies to minimize potential health risks as described in **Project Design Features AQ/GHG-DF-13** through **AQ/GHG-DF-17**. Compliance with **Project Design Features AQ/GHG-DF-13** through **AQ/GHG-DF-17** are considered standard requirements, are included as part of the Project's design features, and are not unique mitigation under CEQA.

Asbestos - Construction

Asbestos is a mineral fiber that has been used commonly in a variety of building construction materials for insulation and as a fire-retardant. When asbestos-containing materials are damaged or disturbed by repair, remodeling or demolition activities, microscopic fibers become airborne and can be inhaled into the lungs, where they can cause significant health problems. No structures are proposed to be demolished as part of the proposed Project.

Based on the California Division of Mines and Geology General Location Guide for Ultramafic Rocks in California - Areas More Likely to Contain Naturally Occurring Asbestos, naturally occurring asbestos, found in serpentine and ultramafic rock, has not been shown to occur within in the vicinity of the Project site. Therefore, the potential risk for naturally occurring asbestos (NOA) during Project construction is small. However, in the event NOA is found on the site, the Project will be required to comply with the National Emission Standards for Hazardous Air Pollutants (NESHAP) standards. An Asbestos NESHAP Notification Form shall be completed and submitted to the CARB immediately upon discovery of the contaminant.

The Project will also be extensively remodeling a number of buildings which may have asbestos-containing materials (ACMs). If present, the Project will be required to follow NESHAP standards for emissions control during site renovation, waste transport and waste disposal. A person certified in asbestos removal procedures will be required to supervise on-site activities. By following the required asbestos abatement protocols, any potential Project impacts will be less than significant.

Construction Traffic

Construction traffic is evaluated with regards to air quality and greenhouse gas related emissions. Construction traffic is expected to be heaviest during the grading phase of the Project but earthwork is expected to be balanced onsite (see Grading under the Project Description). As shown in **Table 6-5**, with compliance with Project Design Features, emission levels associated with on-site and off-site construction traffic will be below the applicable thresholds set forth by the State of California and the SCAQMD.

Localized Operational Emissions

Project-related air emissions from on-site sources such as architectural coatings, landscaping equipment, on-site usage of natural gas appliances as well as the operation of vehicles on-site may have the potential to exceed the State and Federal air quality standards in the Project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin. The nearest sensitive land uses are over 900 feet to the west of the property line.

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a project if the Project includes stationary sources or attracts mobile sources such as heavy-duty trucks that may spend long periods queuing and idling at the site such as industrial warehouse/transfer facilities. The proposed Project is a low intensity institutional use which does not include such on-site emissions sources, and due the lack of stationary source emissions, a long-term localized significance threshold analysis is not typically required for this type of development project.

Table 6-8, *Localized Operational Emissions* shows the localized operational emissions and compares the results to SCAQMD LST thresholds of significance.

Table 6-8
Localized Operational Emissions

Maximum Daily Emissions (lbs./day)[1]				
LST Pollutants	**NOx** (lbs./day)	**CO** (lbs./day)	**PM_{10}** (lbs./day)	**$PM_{2.5}$** (lbs./day)
On-site Emissions[1]	0.39	1.13	0.2	0.1
SCAQMD Operation Threshold[2]	363.0	2,781.0	10.0	3.0
Exceeds Threshold (?)	**No**	**No**	**No**	**No**

[1] Maximum daily emissions during summer or winter.
[2] Mobile source emissions include on-site vehicle emissions only (such as vehicle idling and circulating in the parking lot). It is estimated that approximately 5% of mobile emissions will occur on the Project site.
[3] Reference: 2006-2008 SCAQMD Mass Rate Localized Significant Thresholds for construction and operation Table C-1 through C-6; SRA 26, Temecula Valley disturbance area of 4-acre and receptor distance of 25 meters.

As shown in **Table 6-8**, emissions will be below the SCAQMD thresholds of significance for localized operational emissions. The Project will result in less than significant localized operational emissions impacts.

Toxic Air Contaminants

A Toxic Air Contaminant (TAC) is defined as air pollutants that may cause or contribute to an increase in mortality or serious illness, or which may pose a hazard to human health, and for which there is no concentration that does not present some risk. The primary source of TACs from non-industrial land use development projects would include diesel particulate matter (DPM) generated from diesel exhaust emissions during grading or construction.

Project Design Features AQ/GHG-DF-1 through **AQ/GHG-DF-12** are provided to reduce the project's potential exposure of sensitive receptors to substantial pollutant concentrations during construction from diesel fueled equipment/trucks. Compliance with **Project Design Features AQ/GHG-DF-1** through **AQ/GHG-DF-12** are considered standard requirements and are not unique mitigation under CEQA.

The Project does not include major operational sources of toxic air contaminants (TAC) emissions that would result in significant exposure of sensitive receptors to substantial pollutant concentrations. However, **Project Design Features AQ/GHG-DF-13** through **AQ/GHG-DF-17** are provided to help further reduce the project's potential exposure of sensitive receptors to substantial pollutant concentrations over the long-term from Project operation. Compliance with **Project Design Features AQ/GHG-DF-17** through **AQ/GHG-DF-17** are considered standard requirements and are not unique mitigation under CEQA.

Local CO Emission Impacts from Project-Generated Vehicular Trips

A CO hot spot is a localized concentration of carbon monoxide (CO) that is above the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. At the time of the publishing of the 1993 CEQA Air Quality Handbook, the SCAB was designated nonattainment, and projects were required to perform hot spot analyses to ensure they did not exacerbate an existing problem. Since this time, the SCAB has achieved attainment status and the potential for hot spots caused by vehicular traffic congestion has been greatly reduced. In fact, the SCAQMD AQMP found that peak CO concentrations were primarily the result of unusual meteorological and topographical conditions, not traffic congestion. Additionally, the 2003 SCAQMD AQMP found that, at four of the busiest intersections in SCAB, there were no CO hot spots concentrations.

Furthermore, the TIS found that all significant project traffic impacts would be mitigated to less than significant levels. Therefore, it is reasonable to conclude that the proposed Project would not significantly increase traffic congestion in the vicinity of the site that would lead to the formation of CO Hot Spots. The Project impact to CO Hot Spots will be less than significant.

Health Impacts

The Project is not expected to generate significant levels of NOx that would persist over the life of the Project and exceed the maximum daily emissions limits set by SCAQMD. By exceeding the SCAQMD regional threshold, the impact is considered cumulatively significant and would contribute to ozone formation, a criteria pollutant for which SCAQMD is nonattainment. While the project would

not solely result in the exceedance of an AAQS, potential adverse health impacts associated with increased exposure to pollutant concentrations may occur.

NO_x includes a group of highly reactive gases known as the oxides of nitrogen, and while all of these gases are harmful to human health and the environment, of the greatest concern is Nitrogen Dioxide (NO_2). NO_2 is typically used as the indicator for the larger group of NO_x.

Breathing air with a high concentration of NO_2 can irritate airways in the human respiratory system. Such exposures over short periods can aggravate respiratory diseases, particularly asthma, leading to respiratory symptoms (such as coughing, wheezing or difficulty breathing), hospital admissions and visits to emergency rooms. Longer exposures to elevated concentrations of NO_2 may contribute to the development of asthma and potentially increase susceptibility to respiratory infections. People with asthma, as well as children and the elderly are generally at greater risk for the health effects of NO_2. NO_x also reacts with ammonia, moisture, and other compounds to form small particle that can penetrate deeply into sensitive parts of the lungs.

In addition, NO_x reacts with volatile organic compounds to form ground-level ozone. Breathing ground-level ozone can result in a number of health effects that are observed in broad segments of the population. Some of these effects include; induction of respiratory symptoms, decrements in lung function, and inflammation of airways. Respiratory symptoms from ozone exposure can include; coughing, 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.

SCAQMD, as cited in the Brief of Amicus Curiae to the Supreme Court of California in the Friant Ranch Case, (April 6, 2015), states that, with regards to analysis of air quality related health impacts, EIRs must generally quantify a project's pollutant emissions, but in some cases, it is not feasible to correlate these emissions to specific, quantifiable health impacts (e.g., premature mortality; hospital emissions).

Therefore, given the current limitations of quantifying health risks from NO_x, a quantifiable risk assessment has not been performed.

Conclusion

Based on the analysis above, with adherence to **Project Design Features AQ/GHG-DF-1** through **AQ/GHG-DF-17** the proposed Project will not expose sensitive receptors to substantial pollutant concentrations either during construction or operation. Any impacts will be less than significant, and no mitigation is required.

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

Less Than Significant Impact

According to the CEQA Air Quality Handbook, land uses associated with odor complaints include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations

(such as manufacturing uses that produce chemicals, paper, etc.). Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills.

Heavy-duty equipment in the Project area during construction will emit odors; however, the construction activity would cease to occur after individual construction is completed. The Project is required to comply with Rule 402 during construction, which states that 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. Rule 402 shall be implemented as a standard condition and is not considered unique mitigation under CEQA. Any construction odors will be less than significant.

Land uses that commonly receive odor complaints include agricultural uses (farming and livestock), chemical plants, composting operations, dairies, fiberglass molding facilities, food processing plants, landfills, refineries, rail yards, and wastewater treatment plants. The Project is located within a rural community and any odors emitting agricultural activities would be limited and consistent with the surrounding uses and environment. The Project does not contain land uses that would typically be associated with significant odor emissions.

The Project will be required to comply with standard building code requirements related to exhaust ventilation, as well as comply with SCAQMD Rule 402 which states that a person may 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. Project related odors are not expected to meet the criteria of being a nuisance. Any operational impacts will be less than significant.

The *AQ/GHG Study* recommended the following **Project Design Features AQ/GHG-DF-1** through **AQ/GHG-DF-17** which include standard rules and requirements, best practices, and recognized design features for reducing air quality and GHG emissions. **Project Design Features AQ/GHG-DF-1** through **AQ/GHG-DF-17** are assumed to be part of the conditions of approval for the Project and will be integrated into its design.

Construction Design Features:

AQ/GHG-DF-1 The Project must follow the standard SCAQMD rules and requirements with regards to fugitive dust control, which includes, but are not limited to the following:

- All active construction areas shall be watered two (2) times daily.
- Speed on unpaved roads shall be reduced to less than 15 mph.
- Any visible dirt deposition on any public roadway shall be swept or washed at the site access points within 30 minutes.
- Any on-site stockpiles of debris, dirt or other dusty material shall be covered or watered twice daily.

- All operations on any unpaved surface shall be suspended if winds exceed 15 mph.
- Access points shall be washed or swept daily.
- Construction sites shall be sandbagged for erosion control.
- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Cover all trucks hauling dirt, sand, soil, or other loose materials, and maintain at least 2 feet of freeboard space in accordance with the requirements of California Vehicle Code (CVC) section 23114.
- Pave or gravel construction access roads at least 100 feet onto the site from the main road and use gravel aprons at truck exits.
- Replace the ground cover of disturbed areas as quickly possible.
- A fugitive dust control plan should be prepared and submitted to SCAQMD prior to the start of construction.

AQ/GHG-DF-2 Prepare and implement a Construction Management Plan which will include Best Available Control Measures to be submitted to the County of Riverside.

AQ/GHG-DF-3 Construction equipment shall be maintained in proper tune.

AQ/GHG-DF-4 All construction vehicles shall be prohibited from excessive idling. Excessive idling is defined as five (5) minutes or longer.

AQ/GHG-DF-5 Minimize the simultaneous operation of multiple construction equipment units.

AQ/GHG-DF-6 The use of heavy construction equipment and earthmoving activity shall be suspended during Air Alerts when the Air Quality Index reaches the "Unhealthy" level.

AQ/GHG-DF-7 Utilize low emission "clean diesel" equipment with new or modified engines that include diesel oxidation catalysts, diesel particulate filters or Moyer Program retrofits that meet the California *Air* Resources Board (CARB) best available control technology.

AQ/GHG-DF-8 Establish an electricity supply to the construction site and use electric powered equipment instead of diesel-powered equipment or generators, where feasible.

AQ/GHG-DF-9 Establish staging areas for the construction equipment that are as distant as possible from adjacent sensitive receptors (residential land uses).

AQ/GHG-DF-10 Use haul trucks with on-road engines instead of off-road engines for on-site hauling.

AQ/GHG-DF-11 Utilize zero volatile organic compounds (VOC) and low VOC paints and solvents, wherever possible.

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

AQ/GHG-DF-12 A lead hazard evaluation should be performed prior to the demolition or occupancy of any structure on the project site built before 1978. If necessary, 1-7 a lead abatement plan and clearance inspection should be provided prior to occupancy.

Operational Design Features:

AQ/GHG-DF-13 Comply with the mandatory requirements of Title 24 Part 11 of the California Building Standards Code (CALGreen) and the Title 24 Part 6 Building Efficiency Standards.

AQ/GHG-DF-14 Implement water conservation strategies, including low flow fixtures and toilets, water efficient irrigation systems, drought tolerant/native landscaping, and reduce the amount of turf.

AQ/GHG-DF-15 Comply with the mandatory requirements of CalRecycle's commercial recycling program and implement zero waste strategies.

AQ/GHG-DF-16 Provide the necessary infrastructure to support electric vehicle charging, as required by CALGreen.

AQ/GHG-DF-17 Use electric landscaping equipment, such as lawn mowers and leaf blowers, where feasible.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation 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?	☐	☒	☐	☐
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)?	☐	☒	☐	☐
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?	☐	☒	☐	☐
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?	☐	☒	☐	☐
e) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?				
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?	☐	☐	☐	☒
g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐

Source(s): *Preliminary Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis, Paradise Valley Ranch*, prepared by Searl Biological, 1-2022 (*MSHCP Analysis*, **Appendix C1**); *Jurisdictional Delineation Report, Paradise Valley Ranch*, prepared by Searl Biological, 12-2021 (*JD Report,* **Appendix C2**); Ordinance No. 810.2 (An Ordinance of the County of Riverside Amending Ordinance No. 810 to Establish the Western Riverside County Multiple Species Habitat Conservation Plan Mitigation Fee); and Ordinance No. 633 (An Ordinance of the County of Riverside Amending Ordinance No. 663 Establishing The Riverside County Stephens' Kangaroo Rat Habitat Conservation Plan Fee Assessment Area and Setting Mitigation Fees) https://rchca.us/DocumentCenter/View/200/SKR-Plan-Area.

Note: Any tables or figures in this section are from the *MSHCP Analysis* and/or the *JD Report*, unless otherwise noted.

Findings of Fact:

a) Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?

Less Than Significant with Mitigation Incorporated

The Project consists of new grading for temporary trailers, parking, two water quality basins (3.11-acre and 0.83-acre), new grading for a new decomposed granite (DG) driveway and widening existing onsite roadways for fire access, new Lodge/Office Administration Building. The Project also includes both ground- and roof-mounted solar panels to help power the existing and new facilities. The total area of the Project site is 47.75 acres although only 8.59 acres (minus the existing paved roads) will be disturbed by the Project (17.9%) while the remaining 40.2 acres (82.1%) will remain in its present condition. It should be noted this does not include 1.03-acre of paved roads on the site (including a five-foot buffer) which, when combined with the impact area above equals a total of 9.62 acres of disturbed land on the Project site. The site is located in the northeastern portion of Cactus Valley where the valley meets the foothills of the Santa Rosa Hills.

The Project site supports a variety of vegetation associations, as shown in **Table 7-1, *Local Vegetation*** and **Figure 7-1, *Local Vegetation***. The vast majority of the site (approximately 46.3 acres or 97%) is dominated by development, landscaping, and ruderal (weedy) vegetation or plant associations with native species but which are still dominated by ruderal plants.

Table 7-1
Local Vegetation

COMMON NAME/VEGCAMP COMMUNITY	ENTIRE SITE (PARCEL 3) ACRES	DISTURBED PROJECT AREA ACRES[1]
Brittle Bush Scrub/Ornamental VegCAMP Alliance Brittle bush scrub 33.030.00 No corresponding VegCAMP Association	0.002	0
California Sycamore Woodland/Ruderal VegCAMP Alliance California sycamore woodlands 61.310.00 VegCAMP Association *Platanus racemosa/*annual grass 61.311.03	0.18	0
Coast Live Oak-California Sycamore Woodland/Ruderal VegCAMP Alliance Coast live oak woodland and forest 71.060.00 VegCAMP Association *Platanus racemosa – Quercus agrifolia*[2] 61.312.01 VegCAMP Association *Quercus agrifolia/*grass 71.060.09	0.68	0.07
Coast Live Oak Woodland/Ruderal VegCAMP Alliance Coast live oak woodland and forest 71.060.00 VegCAMP Association *Quercus agrifolia/*grass 71.060.09	0.37	0.03

[1] Excludes the existing paved road areas. The riparian woodland communities within this area included the canopy only. No riparian areas (beds or banks) or associated trees are expected to be impacted or removed by the Project. See Figure 7-1, Local Vegetation.

[2] This Association is listed as "Sensitive" by VegCAMP.

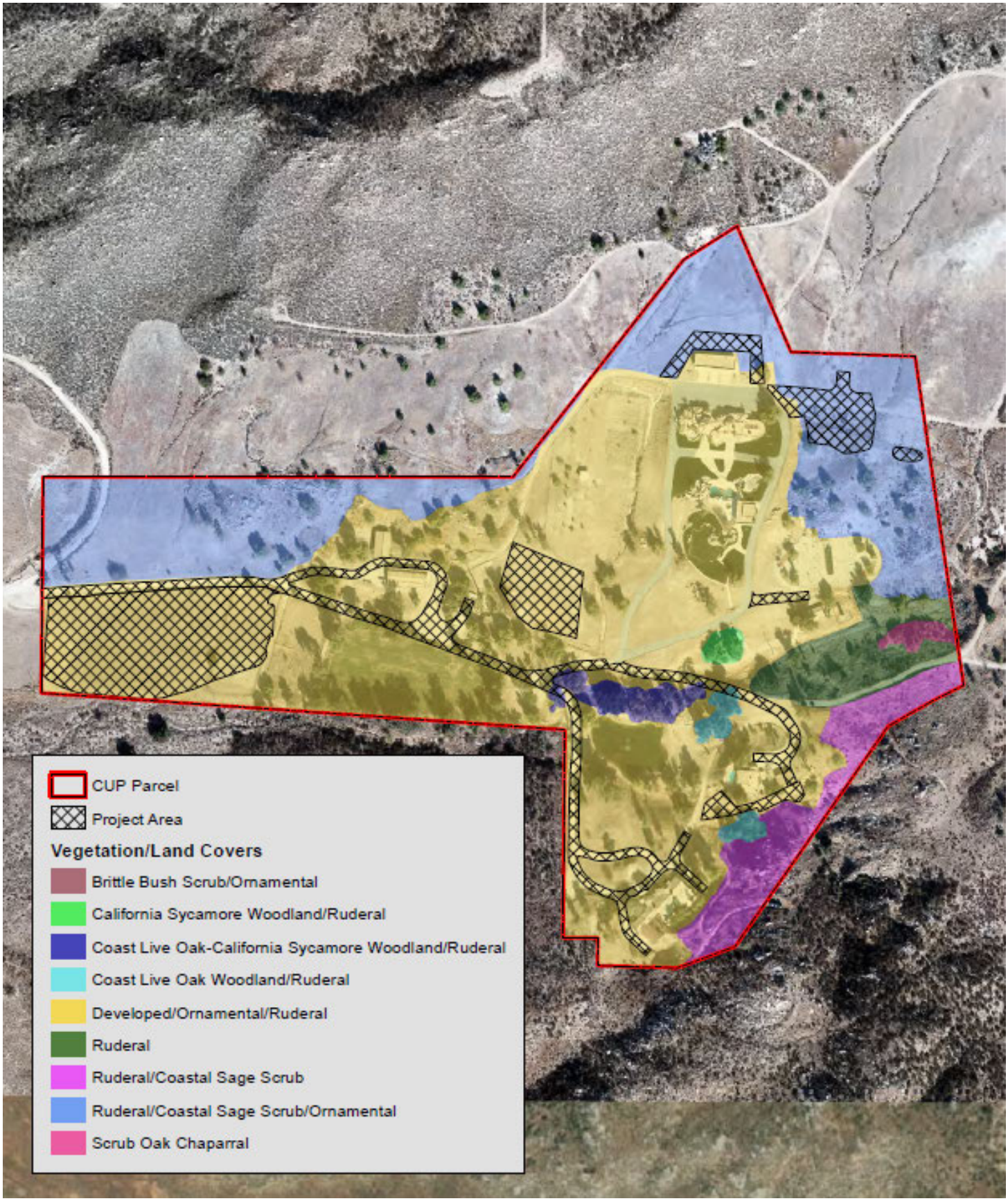
COMMON NAME/VEGCAMP COMMUNITY	ENTIRE SITE (PARCEL 3) ACRES	DISTURBED PROJECT AREA ACRES[1]
Developed/Ornamental/Ruderal VegCAMP Alliance Wild oats and annual brome grasslands 42.027.00 VegCAMP Association *Bromus diandrus* 42.026.21	30.97	7.43
Ruderal VegCAMP Alliance Wild oats and annual brome grasslands 42.027.00 No corresponding VegCAMP Association	1.86	0.003
Ruderal/Coastal Sage Scrub VegCAMP Alliance Wild oats and annual brome grasslands 42.027.00 VegCAMP Alliance California buckwheat scrub 32.040.00 No corresponding VegCAMP Association	2.22	0
Ruderal/Coastal Sage Scrub/Ornamental VegCAMP Alliance Wild oats and annual brome grasslands 42.027.00 VegCAMP Alliance Brittle bush scrub 33.030.00 No corresponding VegCAMP Association	11.25	1.06
Scrub Oak Chaparral VegCAMP Alliance Scrub oak chaparral 37.407.00	0.22	0
TOTAL	**47.75**	**8.59**

The Project site is within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) which is a comprehensive, multi-jurisdictional Habitat Conservation Plan focusing on conservation of species and their associated habitats in Western Riverside County. An *MSHCP Analysis* was prepared to determine if the proposed Project is consistent with the goals and

objectives of the MSHCP and what, if any, measures the Project would need to implement to achieve that consistency.

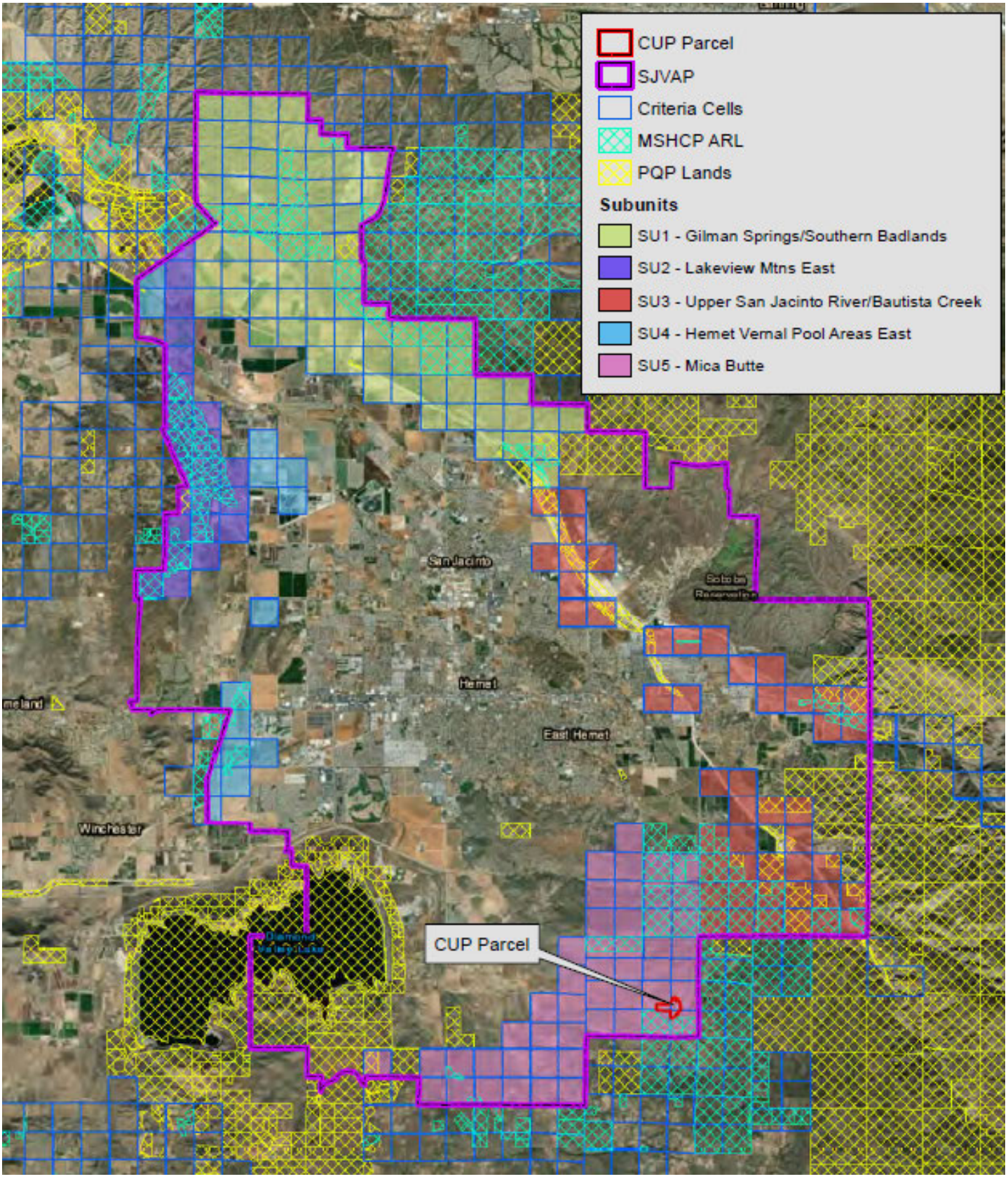
The site is located in the southeastern portion of the San Jacinto Valley Area Plan (SJVAP) within the southeastern portion of MSHCP Subunit 5 (SU5) known as Mica Butte. The western portion of the site is situated within the southern portion of MSHCP Cell Group J', and the eastern portion is within the southern portion of MSHCP Cell Group L' (see **Figure 7-2, *MSHCP Resource Areas*** and **Figure 7-3, *MSHCP Criteria Cell Locations***). Four onsite features may meet the criteria of a MSHCP Section 6.1.2 Riparian/Riverine Area, but the Project will avoid impacts to these four areas. Finally, the site is located within an assessment area for Los Angeles Pocket Mouse.

FIGURE 7-1
Local Vegetation



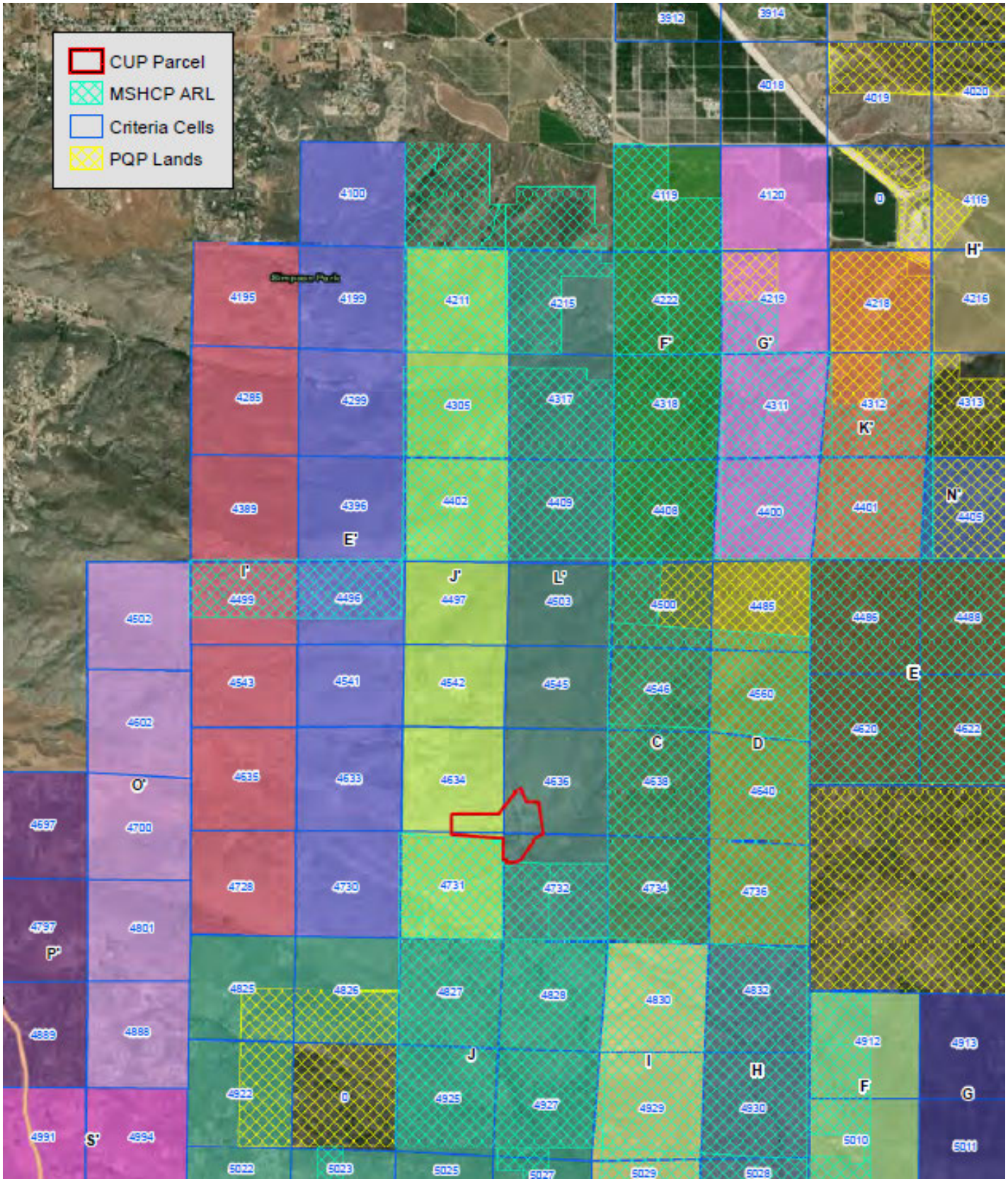
Source: Biological Report (**Appendix C1**)

FIGURE 7-2
MSHCP Resource Areas



Source: Biological Report (**Appendix C1**)

FIGURE 7-3
MSHCP Criteria Cell Locations



Source: Biological Report (**Appendix C1**)

The following sub-sections discuss the portions/requirements of the MSHCP applicable to the proposed Project.

Covered Roads and Facilities

According to the MSHCP, Cactus Valley Road is designated as a "Mountain Arterial" Covered Road, but the Project does not propose any improvements to Cactus Valley Road offsite. In addition, the Project does not entail the construction of, or improvements to, a Covered Public Access Facility.

MSHCP Reserve Assembly Analysis

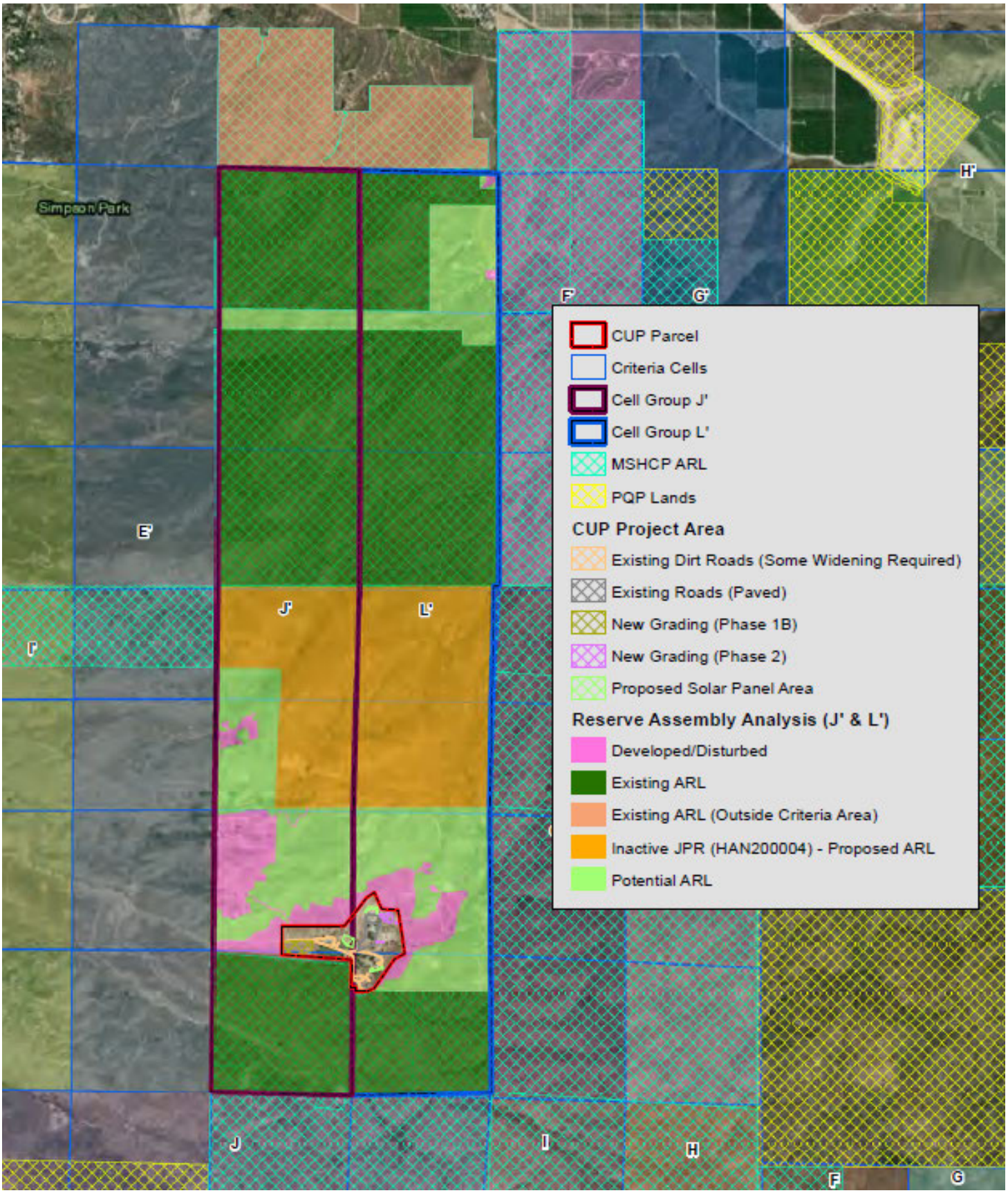
The MSHCP is a criteria-based plan developed by the County and resource agencies to protect listed, sensitive, or otherwise important biological species and their habitats within this portion of the County. A Conceptual Reserve Design was developed for each County Area Plan based on vegetation, species occurrence, and other criteria. Quarter-section "criteria cells" of 160 acres each were identified based on important resources. The cells were either aggregated into a Criteria Cell Group or retained as individual Criteria Cells based upon the level of conservation they provided. Criteria Cells have identification numbers, and each Criteria Cell Group has a letter code. The MSHCP identifies specific conservation criteria for each Criteria Cell or Criteria Cell Group to provide an explicit description of the areas to be targeted for conservation. Consistent with the MSHCP, the *MSHCP Analysis* performed a Reserve Assembly Analysis which determined that Cell Group J' exceeds the targeted Additional Reserve Land (ARL) goals, and that Cell Group L' has the land available to meet the targeted ARL goal without the inclusion of the Project site (see **Figure 7-4, Reserve Assembly Analysis)**.

In summary, the *MSCHP Analysis* concluded that the Project would not impede the conservation targets described for Cell Groups J' and L', and Cell Group J' exceeds its target ARL, and Cell Group L' has the land available to meet the target ARL. Therefore, the development portion of the Project site does not need to be preserved within the ARL to comply with the MSHCP. For additional information, see Section 3 of the *MSHCP Analysis*.

Public Quasi-Public (PQP) Lands

The *MSCHP Analysis* concluded the Project would not directly or indirectly impact PQP Lands, the closest of which are located approximately 0.8-mile southwest of the Project site.

FIGURE 7-4
Reserve Assembly Analysis



Source: Biological Report (**Appendix C1**)

Riparian/Riverine/Vernal Pool Resources (MSHCP Section 6.1.2)

Riparian/Riverine Resources. The *MSHCP Analysis* identified and mapped 16 potentially state jurisdictional features including four ephemeral waterways, nine isolated ephemeral waterways/erosional gullies, two basin/berm areas, and one man-made pond; however, it determined that only four of the identified features with 1.63 acres that potentially meet the criteria of a Riparian/Riverine Area, as shown in **Table 7-2, *Riparian/Riverine Impacts*** and **Figure 7-5, *Onsite Riparian/Riverine Features***. In addition, **Table 7-2** indicates Project activities will impact 0.07-acre or 2,873 square feet of these resources and **only** in the form of tree branches that need to be trimmed for adequate fire equipment access – **no** impacts to bed or banks will occur, and no trees are expected to be removed (i.e., all 16 features will be avoided).

Table 7-2
Riparian/Riverine Impacts

DRAINAGE FEATURE ID[1]	ENTIRE SITE (PARCEL 3)		DISTURBED PROJECT AREA[2]	
	Square Feet	Acres	Square Feet	Acres
A	50,040.68	1.15	2,873.28	0.07
A1	2,408.77	0.06	0	0
A2	7,462.01	0.17	0	0
A3	10,906.03	0.25	0	0
TOTAL	**70,817.49**	**1.63**	**2,873.28**	**0.07**

[1] See Figures 7-5 and 7-6
[2] Tree canopy only - impacts include additional five-foot buffer on each side of onsite roads to be widened

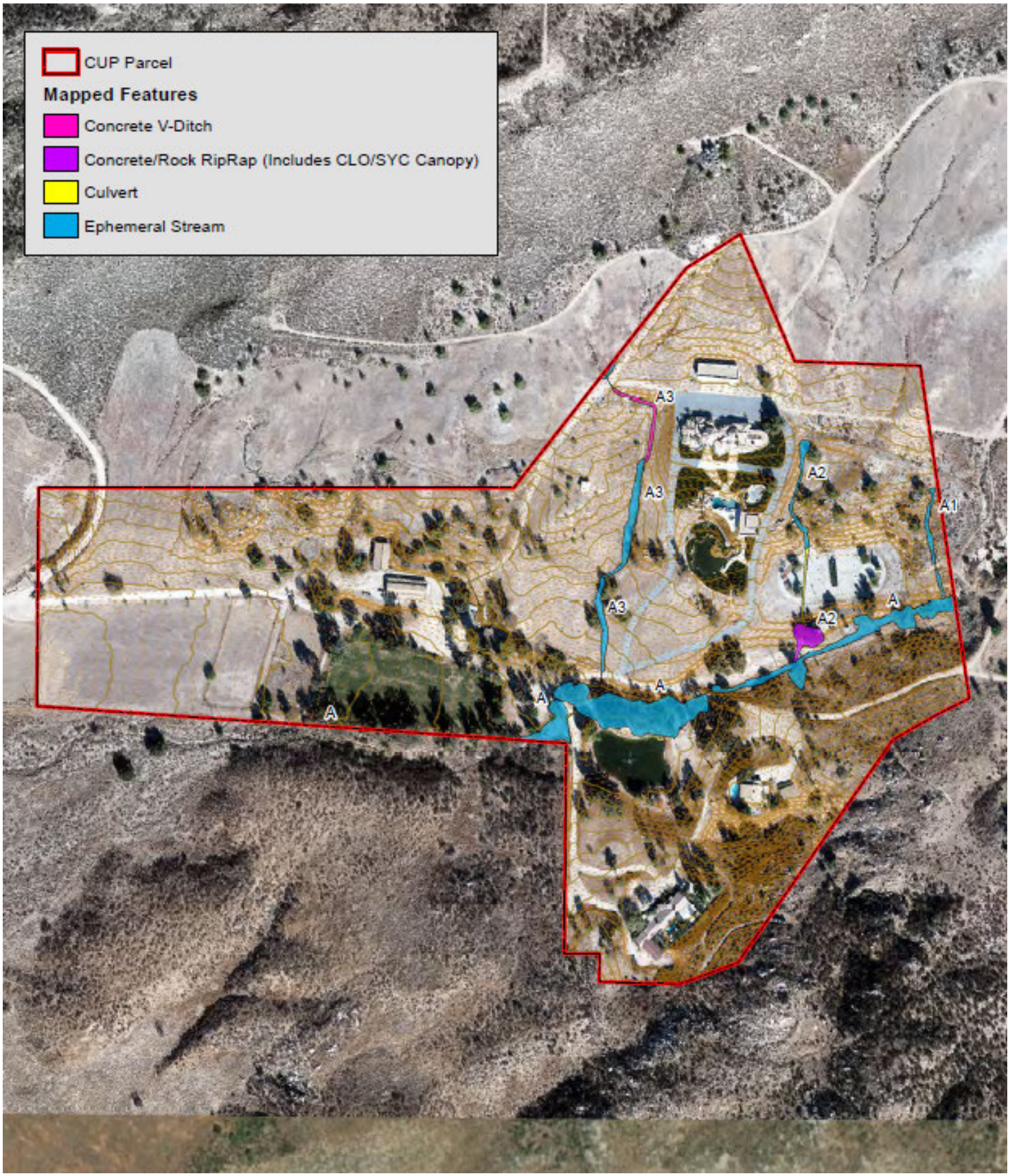
According to the *MSHCP Analysis*, the Project is designed to avoid impacts to potential jurisdictional areas, including MSHCP Riparian/Riverine Areas. **Figure 7-6, *Potential Riparian/Riverine Impacts***, shows onsite areas where the tree canopy intersects with the footprint of the proposed roads. The Project's dirt roads will be surfaced with decomposed granite and widened to 20-feet and/or 24-feet per County requirements. **Figure 7-5** depicts five locations near Drainage Feature A where the Project's roads intersect the mapped potential MSHCP Section 6.1.2 Riparian/Riverine Areas. These five areas consisted entirely of California sycamore and coast live oak canopy and not the bed or associated bank of the drainage.

The *MSHCP Analysis* also stated some minor trimming of branches might be required in these five locations to allow the passage of a full-sized fire truck per County requirements. **Mitigation Measures MM-BIO-1** and **MM-BIO-2** will assure these requirements are met. Therefore, the Project as designed would not have significant impacts on riparian/riverine resources.

Vernal Pools. These areas are depressions where a hard-underground layer prevents rainwater from draining downward into the subsoils. When rain fills the pools in the winter and spring, the water collects and remains in the depressions. In the springtime, the water gradually evaporates away, until the pools become completely dry in the summer and fall. Vernal pools tend to have an impermeable layer that results in ponded water. The soil texture (i.e., the amount of sand, silt, and clay particles) typically contains higher amounts of fine silts and clays with lower percolation rates. Pools that retain water for a sufficient length of time will develop hydric cells. Hydric cells form when the soil is saturated from flooding for extended periods of time and anaerobic conditions (i.e., lacking oxygen or air) develop. The *MSHCP Analysis* reported that none of these conditions (i.e., no depressions, hydric soils, etc.) were observed on the Site and all soils are mapped as sandy/loams

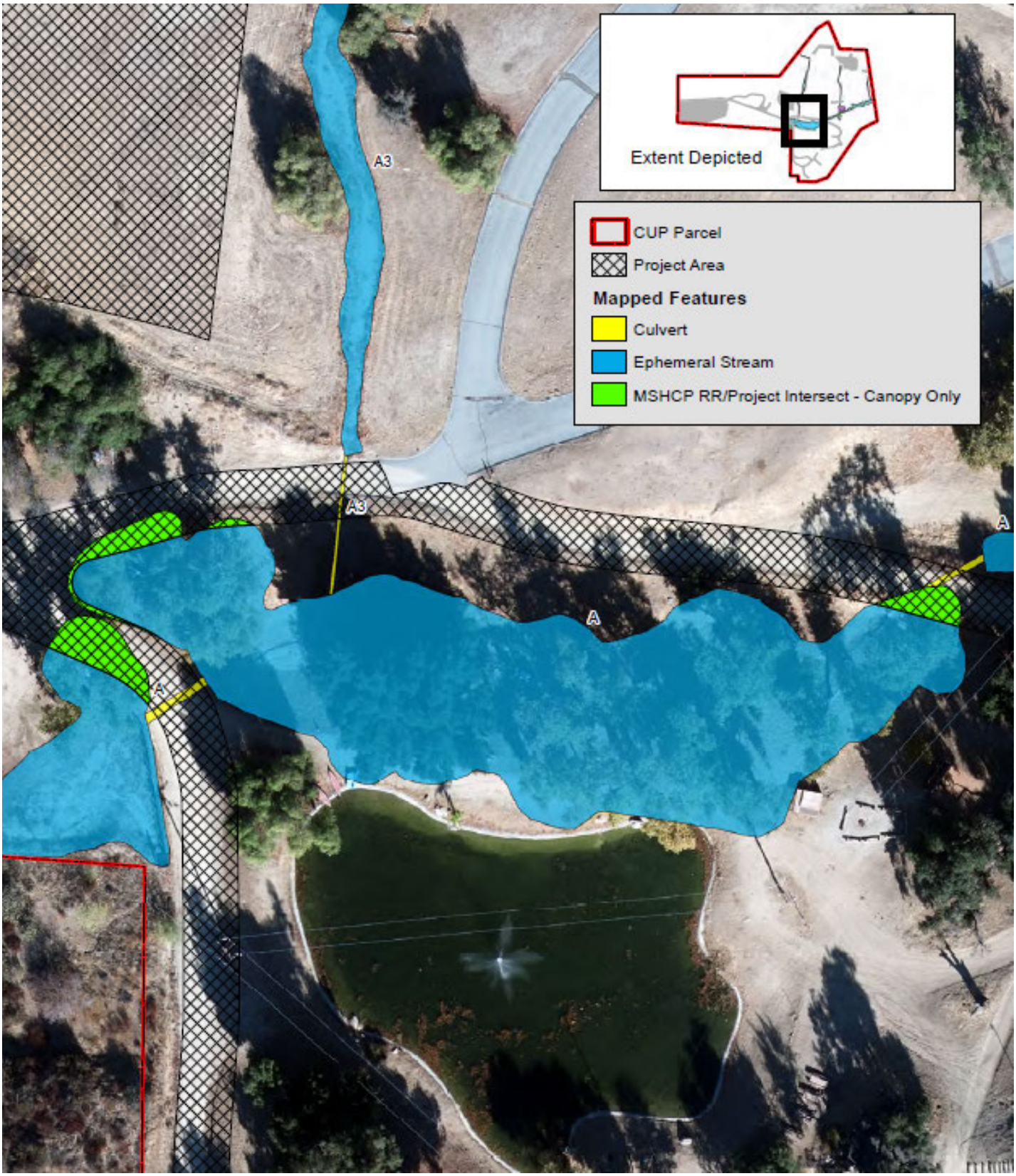
that do not retain water. Therefore, no impacts will occur due to the lack of these resources on the Project site.

FIGURE 7-5
Onsite Riparian/Riverine Features



Source: Biological Report (**Appendix C1**)

FIGURE 7-6
Potential Riparian/Riverine Impacts



Source: Biological Report (**Appendix C1**)

Fairy Shrimp. In areas with stock ponds, ephemeral pools, and other water features are present, the MSHCP requires an assessment of potential habitat for Riverside, vernal pool and Santa Rosa fairy shrimp. The *MSHCP Analysis* found no suitable habitat for fairy shrimp on the Project site (i.e., similar to the vernal pool assessment, no features were detected that would support fairy shrimp). The onsite soils consist entirely of sandy loams, and no evidence of seasonal ponding was detected. In addition, the man-made ponds onsite are fed by well water and contain water year-round. Fairy shrimp require seasonal ponding to complete their life cycle, so these areas do not provide suitable fairy shrimp habitat.

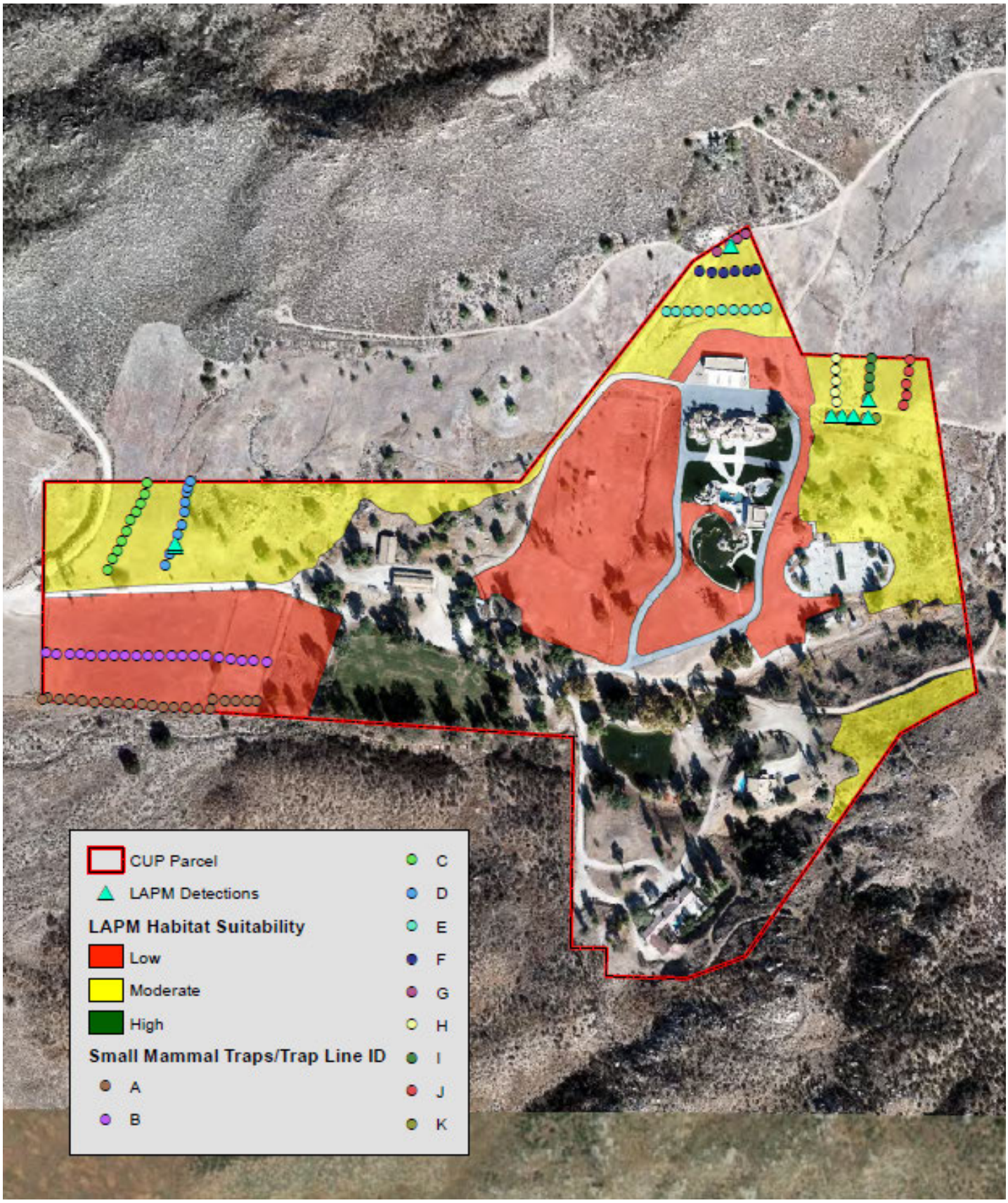
Riparian Birds. The *MSHCP Analysis* included as assessment of suitable habitat for least Bell's vireo, southwestern willow flycatcher, and yellow-bellied cuckoo to determine if these riparian bird species were present on the site. The central portion of Drainage Feature A consists of an open coast live oak-California sycamore woodland but lacks key habitat requirements for all three bird species. Therefore, the *MSHCP Analysis* concluded the Project would have no impacts on riparian birds due to the lack of onsite habitat, and no mitigation is required.

Additional Survey Needs and Procedures (MSHCP Section 6.3.2)

The Project site is not located within a designated assessment area for Narrow Endemic Plant Species (NEPS), Criteria Area Plant Species (CAPS), Burrowing Owl (BUOW), amphibians, or mammals except for the Los Angeles pocket mouse.

Los Angeles Pocket Mouse (LAPM)-Direct Effects. The site is completely within a designated survey area for LAPM, so a focused survey was conducted on the entire site in May of 2021. According to the MSHCP, LAPM is sparsely scattered throughout this area. LAPM appears to be limited to sparsely vegetated areas in patches of fine, sandy soils typically associated with washes or windblown dune-like areas. The general scientific consensus is that LAPM is in decline primarily due to habitat loss. The focused survey found the Project site contains 23.88 acres of suitable LAPM habitat including 12.22 acres of Low value, 11.66 acres of Moderate value, and 0.002 acres of High value habitat (see **Figure 7-7, *LAPM Habitat Areas***). The *MSHCP Analysis* concluded that, "although LAPM may utilize the low-quality habitat on occasion to disperse, the compacted substrates likely preclude LAPM from occupying these areas, and therefore, do not provide long-term conservation value for LAPM." The total impact from the new buildings, basins, and road widening for the Project will be 0.75-acre of Moderate which the MSHCP considers to be of long-term conservation value which is less than the 10% impact allowed to long-term value. When those areas are factored in, the Project will only impact 0.78% of the 96.54-acres of Long-Term Conservation Value (LTCV) habitat on the Property (see **Figure 7-8, *LAPM Impact Areas***). In addition, the Applicant will continue to manage and maintain these areas as currently conducted and have been for the past 50-plus years. Since this is within the 10% impact threshold, the MSHCP does not require a Determination of Biologically Equivalent or Superior Preservation (DBESP) process (see **Mitigation Measure MM-BIO-3**).

FIGURE 7-7
LAPM Habitat Areas



Source: Biological Report (**Appendix C1**)

FIGURE 7-8
LAPM Impact Areas

Source: Biological Report (**Appendix C1**)

LAPM-Indirect Effects. The small-scale Project is not expected to generate disturbances that would cause negative indirect effects on avoided LTCV habitat for LAPM. Further, the Project is not expected to negatively impact LTCV habitat on the remaining undisturbed Project site. Habitat will remain connected to the east, north, and most importantly to the west where high-quality habitat eventually connects to Cactus Valley. The alluvial coastal sage scrub habitats within Cactus Valley likely provide the highest quality habitat in the area. The construction of one building and associated septic systems and/or WQMP basin, and minor road widening on 0.75-acre will not impact or impede LAPM connectivity. Parcel 3 and the greater Property area was located in the far eastern end of the LAPM Assessment Area for Cactus Valley.

In addition to the LAPM, three other sensitive small mammals, all California Species of Special Concern (SCC), were trapped or otherwise detected on or immediately adjacent to the Project site; San Diego Desert woodrat (*Neotoma lepida intermedia*), northwestern San Diego pocket mouse (*Chaetodipus fallax fallax),* and San Diego black-tailed jackrabbit (*Lepus californicus bennettii*). It is likely that the combination of minimal site disturbance (only 17.9% of the entire site will be disturbed) and **Mitigation Measures MM-BIO-1** through **MM-BIO-18** will minimize potential impacts on these SCC - impacts will be less than significant and no additional mitigation is required.

Urban/Wildlands Interface (MSHCP Section 6.1.4)

The MSHCP recommends guidelines to minimize potential "edge effects" resulting from locating development projects near the MSHCP Reserve Assembly or MSHCP conserved resources. Measures, such as buffers and/or barriers, are typically put in place to control drainage, toxics, lighting, noise, and invasives (Invasives are plants that are both non-native and able to establish on many sites, grow quickly, and spread to the point of disrupting plant communities or ecosystems). The following 6.1.4 Guidelines will be implemented to minimize edge effects to the nearby conserved lands and habitats:

- **Drainage:** The Project will implement applicable BMPs (see **Mitigation Measures MM-BIO-4** through **BIO-10**). The Project is not expected to alter the current drainage patterns on the site due to the Project avoiding all potentially jurisdictional/MSHCP Riparian/Riverine Areas. The Project is proposing a WQMP basin in the western portion of the site near the proposed temporary trailers and parking area. This basin will ensure that the quality of the surface runoff is not altered in an adverse way, compared to current conditions, prior to discharging to the ARL south of the site. The basin's size and function are detailed further in the Applicant's WQMP.
- **Toxics:** The Project will implement applicable BMPs (see **Mitigation Measures MM-BIO-4** through **MM-BIO-9**); however, the Project is not expected to generate or discharge toxins.
- **Lighting:** Any Project lighting installed near the Development/Conservation boundary shall be shielded or directed as to not shine directly into the nearby ARL areas (see **Mitigation Measure MM-BIO-11**).
- **Noise:** The Project is not expected to produce any amount of noise that would be considered an impact to wildlife utilizing the nearby ARL areas (see **Mitigation Measure MM-BIO-12**).
- **Invasives:** Project landscaping will avoid those listed in Table 6-2 of the MSHCP which is also provided in Appendix H of the *MSHCP Analysis*. Further, the Project will be landscaped with the appropriate native species such as coast live oak and California sycamore (see **Mitigation Measure MM-BIO-13**).

- **Barriers:** The Project is not proposing new fencing; however, a barbed wire fence is currently present along the site's southern boundary where ARL is present. Signs shall be attached to the existing fence stating, "Conservation Area Beyond This Point" or "Environmentally Sensitive Area," or utilize those the County/RCA utilize to demarcate conservation areas (see **Mitigation Measure MM-BIO-14**).
- **Grading/Land Development:** No grading or land development will extend into the ARL area. Although fuel modification/weed abatement activities are typically not permitted in the ARL area, the RCA and the Applicant have agreed to conduct light weed abatement activities along the southern boundary of the CUP Parcel given the potential for a high severity fire in this location (see **Mitigation Measure MM-BIO-15**. The Applicant has also prepared and submitted a Fire Protection and Management Plan (**Appendix O** provided with this IS) detailing the fire mitigation measures to be implemented.

With implementation of these recommended mitigation measures, potential impacts related to edge effects and urban/wildlands interface will be reduced to less than significant levels.

MSHCP Conservation Goals

In addition to evaluating various specific MSHCP requirements (see above), the *MSHCP Analysis* evaluated the underlying designation of the Project site and surrounding area to meet the overall conservation goals and structure of the MSHCP.

The Project site is located in MSHCP Subunit 5 which has the following planning species and biological issues: Bell's sage sparrow; cactus wren; loggerhead shrike; Quino checkerspot butterfly; bobcat; Los Angeles pocket mouse; mountain lion; and Stephens' kangaroo rat. The MSHCP also states this subunit has the following planning considerations:

- Conserve existing mosaic of upland Habitat east of Diamond Valley Lake and west of the San Bernardino National Forest. Conservation efforts should focus on maintenance of large block(s) of interconnected Habitat for populations of Quino checkerspot butterfly, Bell's sage sparrow, cactus wren and other species. Conservation should occur in large, interconnected habitat blocks, linking existing Public/Quasi-Public Lands.
- Conserve the open grasslands and sparse shrub lands that support populations of Stephens' kangaroo rat, with a focus on suitable Habitat in the Mica Butte area.
- Maintain Core Area for bobcat.
- Maintain Core and Linkage Habitat for mountain lion.
- Determine presence of potential Core Area for the Los Angeles pocket mouse.

The Project site also overlaps MSHCP Cell Groups J' and L' which are located in the northwestern/central portion of Proposed Core 4. According to the MSHCP, the purpose of assembling a Core Area is to form "a block of Habitat of appropriate size, configuration, and vegetation characteristics to generally support the life history requirements of one or more Covered Species." According to the MSHCP, the primary goal of Proposed Core 4 is to provide live-in habitat for the following Planning Species: Quino checkerspot butterfly; arroyo toad; Bell's sage sparrow; cactus wren; loggerhead shrike; Stephens' kangaroo rat; bobcat; Los Angeles pocket mouse; and mountain lion.

The Project proposes development on only 8.59 acres of the 47.75-acre site (17.9%) and the remainder of the property will remain in its current condition. **Mitigation Measure MM-BIO-1** will help assure the development impacts of the proposed Project remain as outlined and analyzed in the MSHCP Analysis. With Project Biological Report implementation of **Mitigation Measures MM-BIO-1**, all potential impacts to habitat lands and species covered by the MSHCP will be reduced to less than significant levels.

Information on Other Species

The *MSHCP Analysis* concluded the area contains no Delhi sands so there will be no impacts related to the Delhi Sands Flower Loving Fly. Regarding "Species Not Adequately Conserved", no species listed in MSHCP Table 9-3 were detected on or near the Project site. Finally, the only species addressed under "Additional Regulatory-Status Species Requiring Special Consideration" is the Coast Live Oak (*Quercus agrifolia*) but this species is addressed in detain under Threshold 7.g.

Gnatcatcher. During the onsite biological fieldwork, Coastal California Gnatcatcher (*Polioptila californica californica*)(CAGN) was observed near the Project area during February and April of 2021. The species was detected at three locations near the Project site (see **Figure 7-9, *Gnatcatcher Locations***). Project-related construction, road widening, and Phase 2 grading operations may result in direct or indirect impacts on this species which are potentially significant, therefore, **Mitigation Measure MM-BIO-18** is recommended to reduce these impacts to less than significant levels.

MSHCP Mitigation Fee

Section 6 of the MSHCP requires:

> "*Payment of the mitigation fee and compliance with the requirements of Section 6.0 are intended to provide full mitigation under the California Environmental Quality Act (CEQA), National Environmental Policy Act (NEPA), Federal Endangered Species Act, and California Endangered Species Act for impacts to the species and habitats covered by the MSHCP pursuant to agreements with the U.S. Fish and Wildlife Service, the California Department of Fish and Wildlife and/or any other appropriate participating regulatory agencies and as set forth in the Implementing Agreement for the MSHCP*."

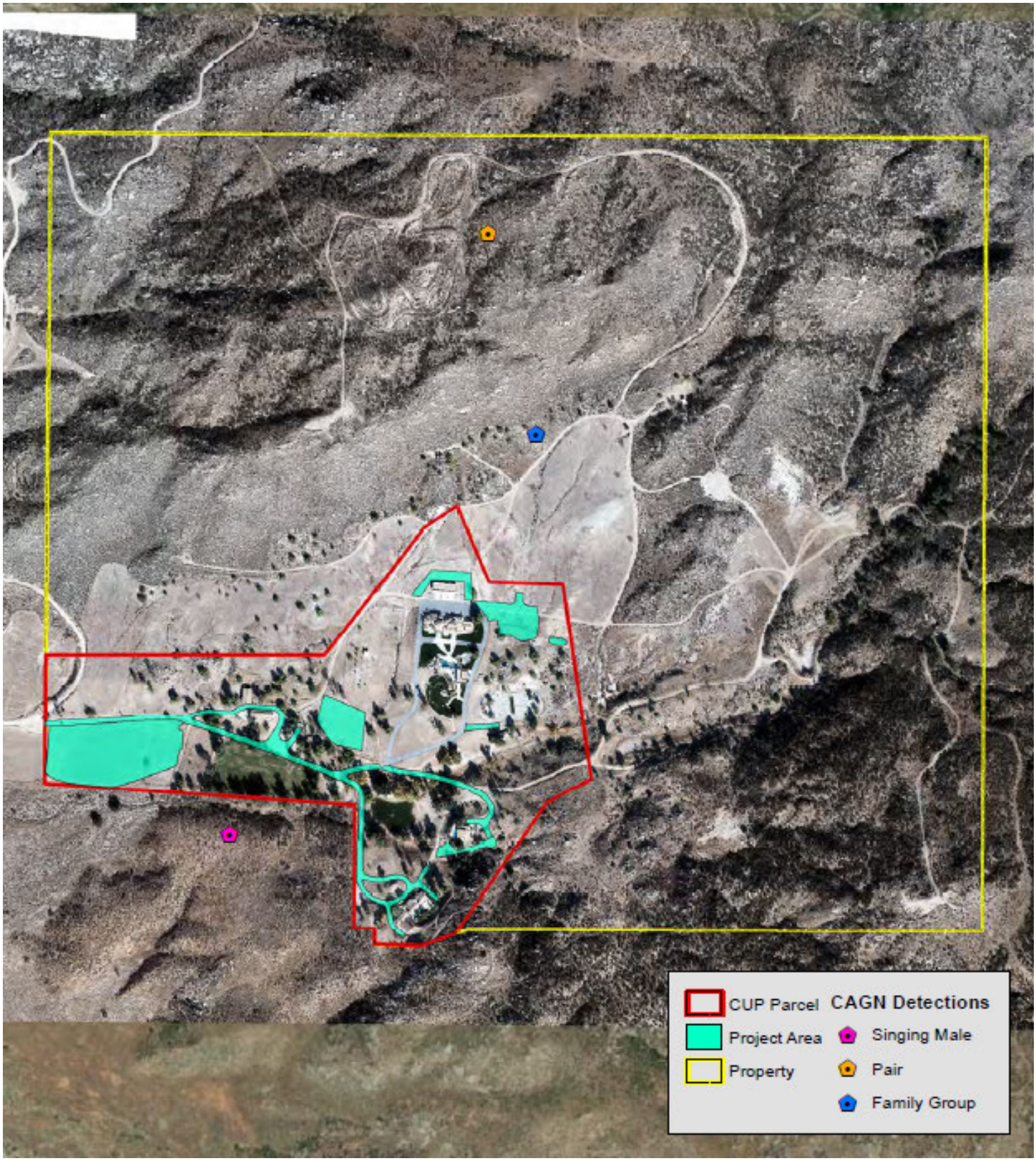
The MSHCP Mitigation Fee has been established to provide mitigation for biological impacts from projects within the MSHCP area. This is not considered unique mitigation under CEQA.

Stephens' Kangaroo Rat HCP

The proposed Project site is not located within the boundary of the Habitat Conservation Plan (HCP) for the endangered Stephens' kangaroo rat (SKR) which was adopted by the Riverside County Habitat Conservation Agency (RCHCA) prior to approval of the MSHCP. The SKR HCP mitigates impacts from development on the SKR by establishing a network of preserves and a system for managing and monitoring them. Since the proposed Project is located outside of the SKR HCP area, it will not be required to comply with applicable provisions of this plan, specifically, payment of fees. In addition, the MSHCP Analysis found no suitable habitat for or indications of presence of the species onsite, therefore, there are no impacts to this species.

Summary of Impacts. In conclusion, the proposed Project is consistent with all applicable sections of the MSHCP. Adherence to standard conditions and implementation of **Mitigation Measures MM-BIO-1** through **MM-BIO-18** will ensure both short- and long-term consistency with the MSHCP. Thus, the proposed Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (i.e., impacts are less than significant with mitigation).

FIGURE 7-9
Gnatcatcher Locations



Source: Biological Report (**Appendix C1**)

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

Less Than Significant with Mitigation Incorporated

The *MSHCP Analysis* evaluated all of the listed and sensitive species of plants and animals covered by the MSHCP that could potentially be impacted by the proposed Project as discussed in Threshold 7.a. While some of these species have been observed in the surrounding area in the past, the Project site does not contain or support any of these species due to its historical and ongoing level of disturbance and human activity.

In addition to species covered by the MSHCP, nesting bird species are protected by California Fish and Game Code Sections 3503 and 3503.5 and by the Migratory Bird Treaty Act (MBTA) of 1918 (16 USC 703-711), which make it unlawful to take, possess, or needlessly destroy the nest or eggs of any migratory bird or bird of prey. The MBTA created the following:

> *"Establishment of a Federal prohibition, unless permitted by regulations, to "pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention . . . for the protection of migratory birds . . . or any part, nest, or egg of any such bird." Further, the California Fish and Game Code (CFGC) states the following: CFGC 3503: "It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." CFGC 3503.5: "It is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto."*

The Project site, and areas in the immediate vicinity, contains trees, shrubs, and grasslands that provide suitable nesting habitat for a number of migratory bird species known to nest in the Project area. Impacts to nesting bird species must be avoided at all times. The period from approximately January 1 to August 31 is the expected breeding season for bird species occurring in the Project area. Under **Mitigation Measure MM-BIO-16**, if Project activity or vegetation removal must be initiated during the breeding season, a qualified biologist will check for nesting birds within three days prior to such activity. If active bird nests are found, avoidance buffers will need to be established and observed. With the implementation of **Mitigation Measure MM-BIO-16** impacts to nesting birds will be less than significant.

In summary, implementation of the proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any endangered or threatened species as discussed in Threshold 7.a. above and the following Thresholds 7.c., 7.d, and 7.e. With the incorporation of **Mitigation Measures MM-BIO-1** through **MM-BIO-3** and **MM-BIO-18**, potential impacts to listed species will be reduced to less than significant levels. The Project will be required to pay applicable MSHCP Mitigation Fees pursuant to Ordinance No. 810.2. These are standard

fees and are not considered unique mitigation under CEQA. Any impacts will be reduced to less than significant levels.

c) *Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service?*

Less Than Significant with Mitigation Incorporated

Discussion is referenced in Threshold 7.a, 7.d, 7.e., and 7.f. Based on this data, the Project will not 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. Mitigation related to nesting birds (**MM-BIO-16**), as well as standard conditions for payments of the applicable MSHCP fee will ensure all impacts remain at less than significant levels.

d) *Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Less Than Significant with Mitigation Incorporated

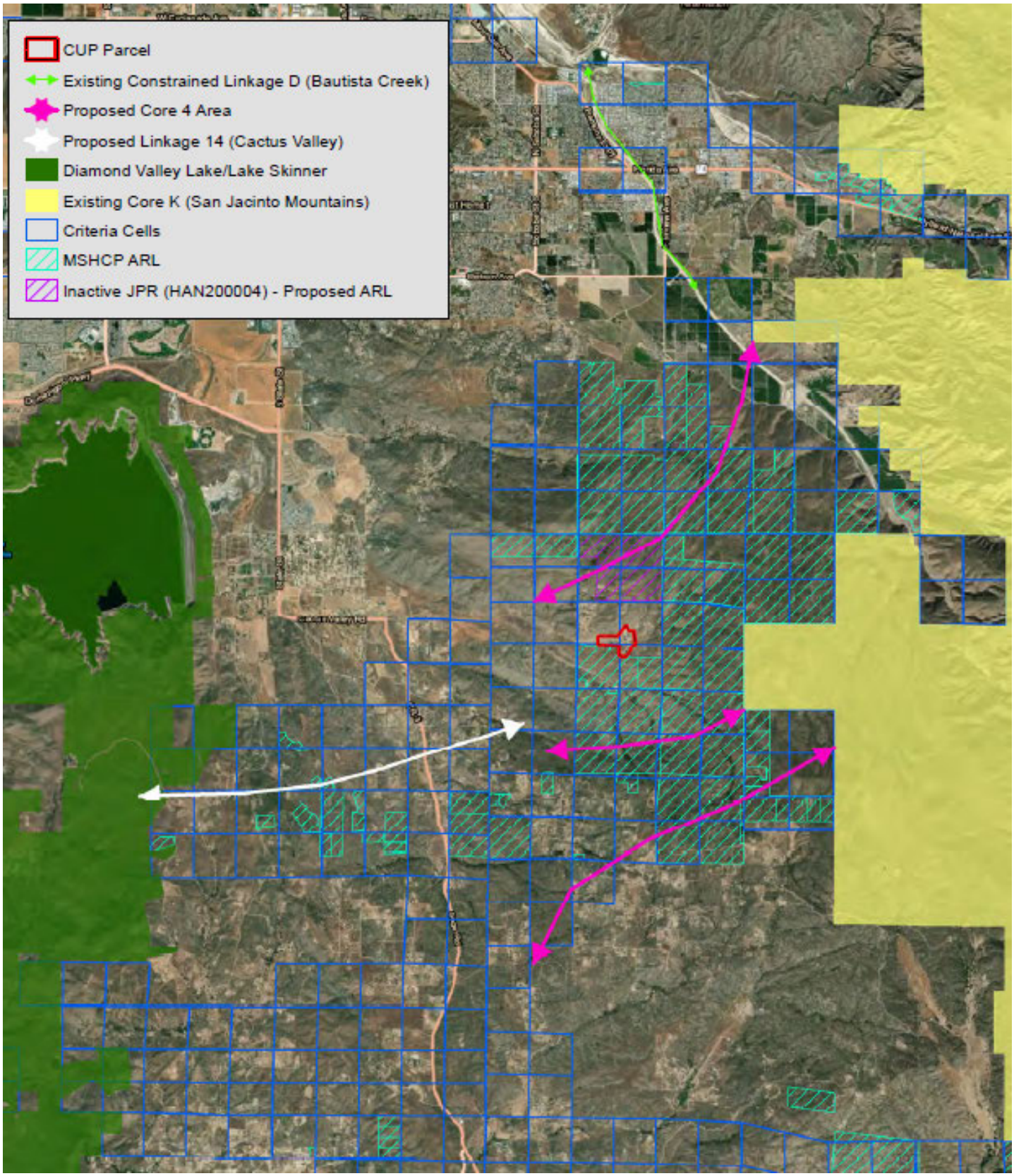
Under the MSHCP, the proposed Core 4 (East Cactus Valley) is comprised mainly of private lands and is generally unconstrained by existing urban development or agricultural use. Connections are anticipated Core 4 via Existing Constrained Linkage D (Bautista Creek) connecting to Existing Core K (the San Jacinto Mountains). The Core also functions as a Linkage connecting the Diamond Valley Lake/Lake Skinner and Cactus Valley areas in the west with the San Jacinto Mountains in the east. The fact that Proposed Core 4 is contiguous with the Existing Core K greatly enlarges the functional area of the Core.

The Project site contains a man-made pond that may provide indirect support for small to large mammals that inhabit natural areas to the east and northeast, or resident or migratory birds that may utilize or inhabit the Project area. In addition, leaving the remaining 84.3% of the site vacant will help protect any wildlife movement through this area, including the identified cores and linkages (see **Figure 7-10, *Area Cores and Linkages***).

As discussed in Threshold 7.b, nesting bird species are protected by California Fish and Game Code Sections 3503 and 3503.5 and by the MBTA of 1918 (16 USC 703-711), which makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any migratory bird or bird of prey. A number of resident and migratory birds utilize the general Project area although the site itself is disturbed and contains no native habitat. However, lands in the immediate vicinity of the Project contain trees, shrubs, and grasslands that may provide potential suitable nesting habitat for migratory bird species.

Based on the results of the *MSHCP Analysis*, the site contains no native wildlife nursery sites, and the site itself is not identified as being part of or functions as a migratory wildlife corridor for any fish or wildlife species.

FIGURE 7-10
Local Cores and Linkages



Source: Biological Report (**Appendix C1**)

Impacts to nesting bird species must be avoided at all times. The period from approximately January 1 to August 31 is the expected breeding season for bird species occurring in the Project area, including raptors. Under **Mitigation Measure MM-BIO-18**, if Project activity or vegetation removal is initiated during the breeding season, a qualified biologist should check for nesting birds within three days prior to such activity. If active bird nests are found, avoidance buffers of 1,000 feet for large birds of prey, 500 feet for small birds of prey, and 250 feet for songbirds, decided by CDFW on a case-by-case basis, will need to be observed and implemented. With the implementation of **Mitigation Measure MM-BIO-18**, potential impacts to nesting birds will be less than significant.

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

Less Than Significant Impact

As discussed in Threshold 7.a, the *MSHCP Analysis* identified and mapped 16 potentially state jurisdictional features including four ephemeral waterways, nine isolated ephemeral waterways/erosional gullies, two basin/berm areas, and one man-made pond. in the *MSHCP Analysis* found 1.63 acres of land that were potential riparian/riverine resources under the MSHCP (see previous Table 7.A). There are no drainages that meet the federal definition of wetlands or other federal jurisdictional designations on the site.

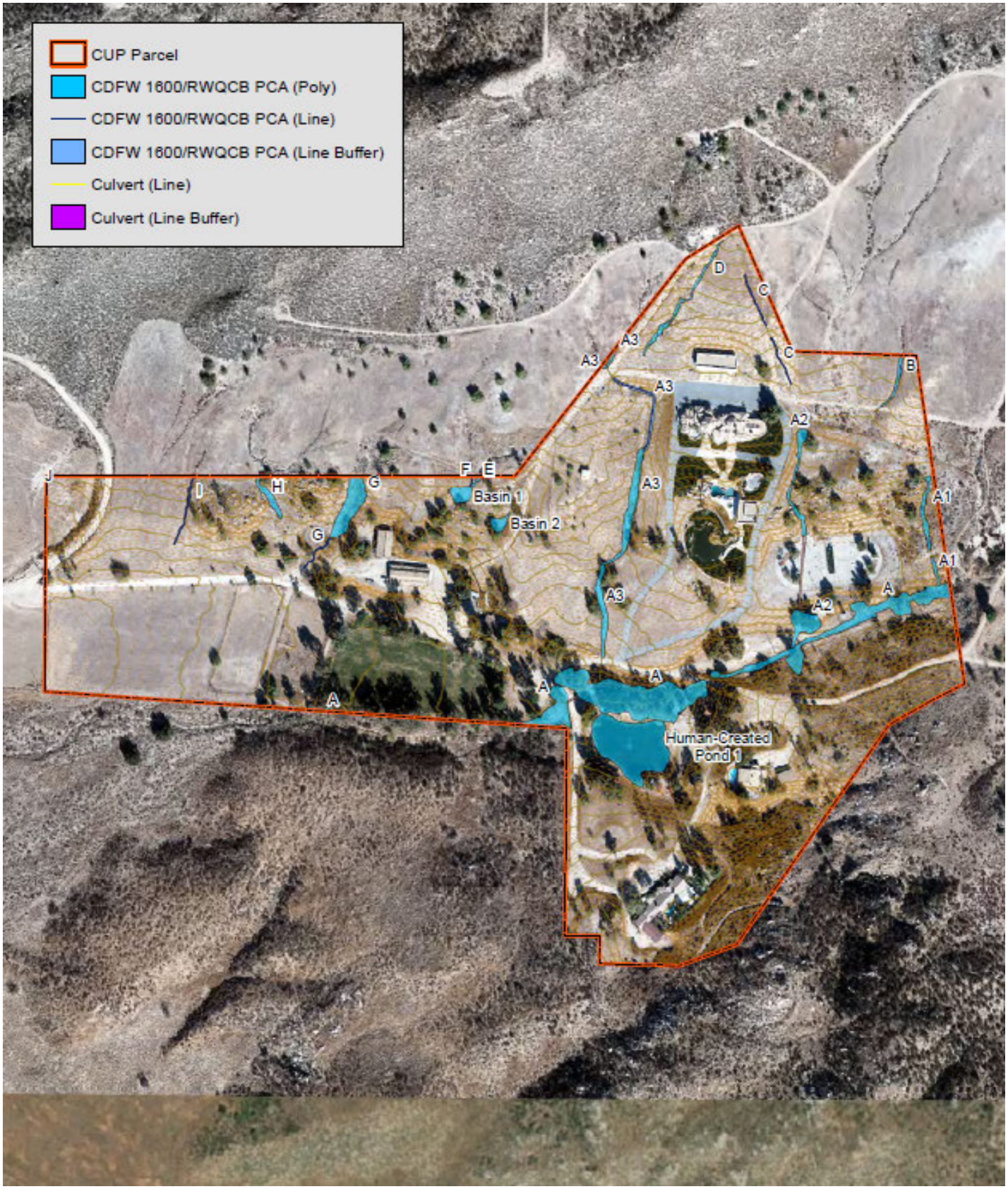
In addition, a Jurisdictional Delineation (*JD Report*) was prepared for the Project that went into more detail on the various onsite drainage features. The *JD Report* found a total of 2.51 acres of land that could fall under the jurisdiction of the California Department of Fish and Wildlife (CDFW) and/or the Regional Water Quality Control Board (RWQCB), as shown in **Table 7-3, *Potential Onsite Jurisdictional Areas*** and **Figure 7-11, *Potential Onsite Jurisdictional Areas***.

Table 7-3
Potential Onsite Jurisdictional Areas

FEATURE ID[1]	ENTIRE SITE[2] PARCEL 3 (CDFW/RWQCB)		DISTURBED PROJECT AREA[3] (CDFW/RWQCB)	
	Square Feet	**Acres**	**Square Feet**	**Acres**
A	50,040.68	1.15	2,873.28	0.07
A1	2,408.77	0.06	0	0
A2	7,462.01	0.17	0	0
A3	10,906.03	0.25	0	0
B	1,011.26	0.02	0	0
C	566.09	0.01	0	0
D	2,472.22	0.06	0	0
E	224.17	0.005	0	0
F	26.50	0.0006	0	0
G	6,577.79	0.15	0	0
H	1,579.40	0.04	0	0
I	371.59	0.009	0	0
J	3.10	0.00007	0	0
Basin 1	1,927.77	0.04	0	0
Basin 2	1,302.35	0.03	0	0
Human-Created Pond 1	22,627.56	0.52	0	0
TOTAL	**109,507.29**	**2.51**	**2,873.28**	**0.07**

[1] See Figure 7-9 – Features A-A3 are within the disturbance area, Features B-J are in the non-development portion of the site
[2] State jurisdiction either “waters of the state” (RWQCB) or riparian resources under State Fish and Game Code 1600 (CDFW)
[3] 0.07-acre impact is to tree canopy **ONLY** from trimming- No trees will be removed, and no impacts will occur to the beds or banks

FIGURE 7-11
Potential Onsite Jurisdictional Areas



Source: Jurisdictinal Report (**Appendix C2**)

Both the *MSHCP Analysis* and *JD Report* found that development of the Project would only result in the potential trimming of 0.07-acre of tree canopy associated with drainage feature A (i.e., but **not** within the bed or bank). In addition, the existing overall hydrologic flow regime of the site and surrounding area will remain unchanged. The Project will result in the potential loss of 0.07-acre of (only) tree canopy from the trimming of native trees to allow adequate fire truck access. However, this does not represent a significant impact to jurisdictional resources and no permits are expected to be required from the resource agencies in this regard. With these actions, the Project will not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations of the California Department of Fish and Game or U. S. Fish and Wildlife Service. Impacts will be less than significant, and no mitigation is required.

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

No Impact

Both the *MSHCP Analysis* and *JD Report* found that the Project site contains no habitat meeting the criteria of a wetlands or vernal pool. Therefore, no impacts to vernal pools will occur with Project implementation. In addition, no suitable habitat for fairy shrimp was detected on the Project site. Therefore, the Project will not 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 impacts will occur, and no mitigation is required.

g) Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

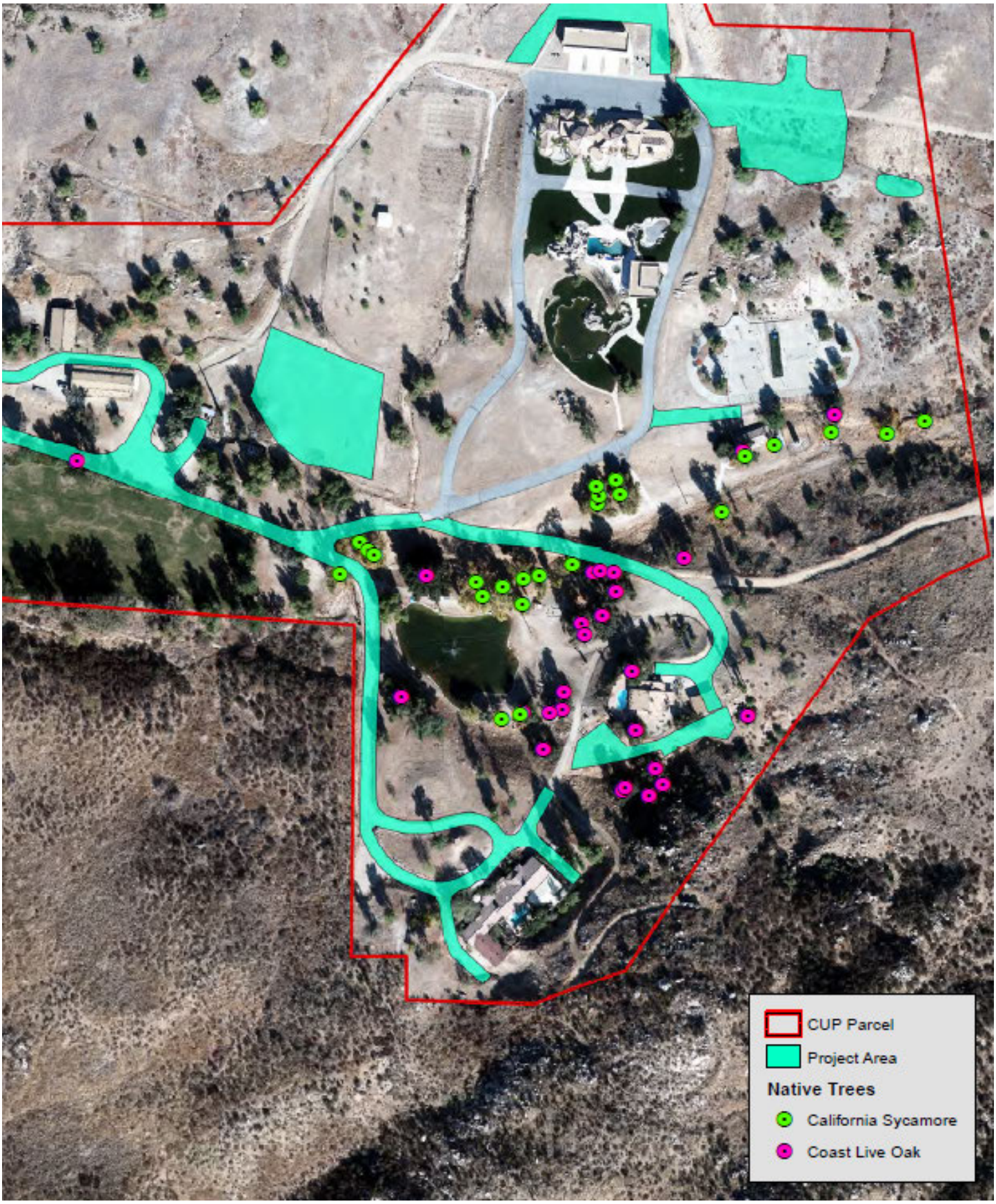
Less Than Significant with Mitigation Incorporated

The Project site contains several dozen native or naturalized tree species and the Project will likely require the removal of one planted coast live oak in the western end of the site. This oak is a healthy, irrigated tree with a diameter at breast height (DBH) of 25 inches (see **Figure 7-12, *Onsite Trees***). The County protects native oak trees and oak woodlands through the Riverside County Oak Tree Management Guidelines. The Project's landscape plan includes the planting of 21 new coast live oak trees (24-inch box size) and additional sycamore trees. These plantings will offset the removal of the one planted coast live oak (see **Mitigation Measure MM-BIO-17**).

The provisions of County Ordinance No. 559 would not apply since the Project site is not above 5,000 feet in elevation. No other tree preservation or other local policy or ordinance relative to biological resources apply to the Project site.

Therefore, the proposed Project will not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Impacts will be less than significant with implementation of the referenced mitigation.

FIGURE 7-12
Onsite Trees



Source: Biological Report (**Appendix C1**)

Mitigation Measures:

The following measures were identified during the discussion of Project impacts on biological resources under Thresholds 7.a through 7.g.

MSHCP Consistency

MM-BIO-1 **Consistency with MSHCP Report.** All Project construction and operations shall generally conform to those activities outlined in the Project MSHCP Analysis (*Preliminary Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis, Paradise Valley Ranch*, prepared by Searl Biological, 12-2-2022) and the Project Jurisdictional Delineation Report (*Jurisdictional Delineation Report, Paradise Valley Ranch*, prepared by Searl Biological, 12-2021). Major deviations, changes, or additions to construction of operation (i.e., any action that increases the estimated impact area by more than 10%) shall require an evaluation of the proposed change(s) relative to the Project Reports. This evaluation will be to determine if a new or modified report is required and if additional actions are needed to protect biological resources under the MSHCP to the level afforded by the Project Reports at the time the Project is approved. Any changes from those improvements outlined in Project Reports must be documented and found consistent with the conclusions and mitigation measures outlined in approved IS/MND.

MM-BIO-2 **Biological Monitor.** Prior to the start of any Project construction, the applicant shall retain a qualified biological consultant to monitor all activities including any minor trimming of branches that might be required along Project access roads to allow the passage of a full-sized fire truck per County requirements. The Project Biologist shall monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat and species of concern outside the project footprint. This measure shall be implemented and documented by the Project Monitor consistent with the Project Biological Reports outlined in **MM-BIO-1**.

MM-BIO-3 **LAPM Monitoring.** The new buildings, basins, and road widening for the Project will impact 0.75-acre of Los Angeles Pocket Mouse (LAPM) moderate quality habitat land which accounts for 6.4% of the long-term conservation value habitat within the Project site. Since this is within the 10% impact threshold, the MSHCP does not require a Determination of Biologically Equivalent or Superior Preservation (DBESP) process. The Biological Monitor identified in **MM-BIO-2** shall also monitor Project activities to assure no impacts to LAPM habitat occur greater than those estimated by the Project MSHCP Analysis outlined in **MM-BIO-1**.

MSHCP Best Management Practices

In addition to the BMPs required by the Project Water Quality Management Plan (WQMP), the Project shall implement the following BMPs to help reduce potential impacts related to biological resources that may utilize onsite drainages and water features:

MM-BIO-4 **Training Sessions.** Prior to issuance of a grading permit, a condition shall be placed on grading plans requiring a qualified biologist to conduct a training session for

project personnel prior to grading. The training shall include a description of the species of concern and their habitats, the general provisions of the Endangered Species Act (Act) and the MSHCP, the need to adhere to the provisions of the Act and the MSHCP, the penalties associated with violating the provisions of the Act, the general measures that are being implemented to conserve the species of concern as they relate to the project, and the access routes to and project site boundaries within which the project activities must be accomplished.

MM-BIO-5 **Minimize Impacts to Drainages.** Per **MM-BIO-2**, the Project Biological Monitor shall help assure the footprint of disturbance shall be minimized to the maximum extent feasible. Access to sites shall be via pre-existing access routes to the greatest extent possible. The upstream and downstream limits of projects disturbance plus lateral limits of disturbance on either side of any stream or drainage feature within the work area shall be clearly defined and marked in the field and reviewed by the biologist prior to initiation of work. This work shall include avoiding the placement of equipment and personnel within a stream channel, banks, and adjacent upland habitats used by target species of concern.

MM-BIO-6 **Erosion Control Cleanup.** Per **MM-BIO-2** and prior to completion of construction, the Project Biologist shall ensure that any silt fencing of other sediment trapping materials shall be installed at the downstream end of construction activity to minimize the transport of sediments offsite. Settling ponds where sediment is collected shall be cleaned out in a manner that prevents the sediment from reentering any downstream drainages.

MM-BIO-7 **Spill Prevention/Notification.** Per **MM-BIO-2** and prior to and during construction, the Project Biologist shall ensure that equipment storage, fueling, and staging areas shall be located on upland sites with minimal risks of direct drainage into riparian areas or other sensitive habitats. These designated areas shall be located in such a manner as to prevent any runoff from entering any sensitive habitat or water features to the extent practical. All heavy equipment shall have oil pans placed underneath them when they are not in use. Necessary precautions shall be taken to prevent the release of cement or other toxic substances into surface waters. Project-related spills of hazardous materials shall be reported to appropriate entities including but not limited to the County, CDFW, and RWQCB as appropriate, and shall be cleaned up immediately and contaminated soils removed to approved disposal areas.

MM-BIO-8 **Construction Limits.** Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed project footprint and designated staging areas and routes of travel. The construction area(s) shall be the minimal area necessary to complete the project and shall be specified in the construction plans. Construction limits will be fenced with orange snow screen. Exclusion fencing should be maintained until the completion of all construction activities. Employees shall be instructed that their activities are restricted to the construction areas.

MM-BIO-9 **Site Cleanup.** Per **MM-BIO-2**, the Project Biologist shall ensure that erodible fill material shall not be deposited into drainage or water features. Brush, loose soils, or other similar debris material shall not be stockpiled within any drainage channels

or on their banks. The removal of native vegetation shall be avoided or minimized to the maximum extent practicable. Temporary impacts shall be returned to pre-existing contours and revegetated with appropriate native species. Exotic species that prey upon or displace target species of concern should be permanently removed from the site to the extent feasible. To avoid attracting predators of the species of concern, the project site shall be kept as clean of debris as possible. All food related trash items shall be enclosed in sealed containers and regularly removed from the site(s).

MM-BIO-10 **Permittee Access.** The Permittee shall have the right to access and inspect any construction sites including any restoration/enhancement areas for compliance with project approval conditions including these BMPs.

MM-BIO-11 **Lighting.** New or modified lighting shall be installed to be directed down and/or away from any habitat areas in the general vicinity (i.e., to the south).

MM-BIO-12 **Noise.** The Project site shall not use amplified sound systems or audible paging systems to minimize noise impacts on nearby habitat areas (i.e., to the south).

MM-BIO-13 **Landscaping.** Project landscaping shall avoid those species listed in Table 6-2 of the MSHCP which is also provided in Appendix H of the *MSHCP Analysis*. Further, the Project will be landscaped with the appropriate native species such as coast live oak and California sycamore.

MM-BIO-14 **Signage.** The Project is not proposing new fencing; however, a barbed wire fence is currently present along the site's southern boundary where ARL is present. Signs shall be attached to the existing fence stating, "Conservation Area Beyond This Point" or "Environmentally Sensitive Area," or utilize those the County/RCA utilizes to demarcate conservation areas.

MM-BIO-15 **Weed Abatement/Land Disturbance.** No grading or Project-related activities shall extend into the ARL area immediately south of the site. Although fuel modification/weed abatement activities are typically not permitted in the ARL area, the RCA and the Applicant have agreed to conduct light weed abatement activities along the southern boundary of the Project site given the potential for a high severity fire in this location. All activities shall conform to the Project Fire Protection and Management Plan (*Fire Protection and Management Plan, Paradise Valley Ranch*, prepared by Matt Rahn et al, 9-2021). This measure shall be implemented to the satisfaction of the Project Biologist and/or the County Planning Department.

Nesting Birds

MM-BIO-16 **Nesting Bird Surveys.** If Project-related grading or construction occurs during the nesting season (i.e., January 1 – August 31 for raptors and hummingbirds; February 1 – August 31 for all other birds), a pre-construction nesting bird survey shall be conducted within a maximum of three (3) days prior to the start of onsite equipment mobilization and staging, clearing, grubbing, vegetation removal, or grading, whichever occurs first. This survey shall be conducted by a qualified biologist holding a Memorandum of Understanding (MOU) with Riverside County. The findings shall

be submitted to the County of Riverside Planning Department for review and approval prior to issuance of any ground disturbing activity.

Surveys shall be conducted in proposed work areas, staging and storage areas, and soil, equipment, and material stockpile areas. For passerines and small raptors, surveys shall be conducted within a 250-foot radius surrounding the work area (in areas where access is feasible). For larger raptors, the survey area shall encompass a 500-foot radius. Surveys shall be conducted during weather conditions suited to maximize the observation of possible nests and shall concentrate on areas of suitable habitat. If a lapse in project-related work of five (5) days or longer occurs, an additional nest survey shall be required before work can be reinitiated. If nests are encountered during any preconstruction survey, a qualified biologist shall determine if it may be feasible for construction to continue as planned without impacting the success of the nest, depending on conditions specific to each nest and the relative location and rate of construction activities.

If the qualified biologist determines construction activities have potential to adversely affect a nest, the biologist shall immediately inform the construction manager to halt construction activities within minimum exclusion buffer of 50 feet for songbird nests, and 200 to 500 feet for raptor nests, depending on species and location. Active nest(s) within the Project site shall be monitored by a qualified biologist during construction if work is occurring directly adjacent to the established no-work buffer. Construction activities within the no-work buffer may proceed after a qualified biologist determines the nest is no longer active due to natural causes (e.g., young have fledged, predation, or other non-human causes of nest failure).

If nesting bird surveys result in the need for a biological monitor to be present during construction activities, then one shall be present full-time to monitor construction activities to ensure no direct or indirect impacts occur to potential nest success. The biologist shall have the authority to suspend construction activities if potential impacts are observed.

Native Trees

MM-BIO-17 **Tree Removal.** The Project's landscape plan includes planting of 21 coast live oak trees (24-inch box size) to offset the removal of one existing coast live oak tree. Prior to and during removal of any native trees, the applicant shall demonstrate compliance with Riverside County's Oak Tree Management Guidelines and the Project landscape plan as applicable.

California Gnatcatcher

MM-BIO-18 **CAGN Monitoring.** A California Gnatcatcher (CAGN)-permitted biologist shall be designated and responsible for overseeing compliance with avoidance measures (e.g., pre-construction buffers) for CAGN during grading activities. If grading occurs during the CAGN nesting season in areas that support CAGN, at least three presence/absence surveys shall be conducted one week apart per the USFWS CAGN Presence/Absence Survey Guidelines (U. S. Fish & Wildlife Service, 1997) between February 15 and August 30, shall be conducted prior to the commencement of grading activities. If

grading occurs during the CAGN nesting season, a CAGN-permitted biologist shall conduct full-time biological monitoring during grading operations and will have the authority to establish a 500- foot no disturbance buffer around active nests, if present.

Monitoring: Provide results of biological monitoring and nesting bird and CAGN surveys to County of Riverside for review and approval.

CULTURAL RESOURCES Would the Project:				
8. Historic Resources a) Alter or destroy a historic site?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?	☐	☒	☐	☐

Source(s): *Historical/Archaeological Resources Survey Report, Paradise Valley Ranch Project*, prepared by CRMTECH, 10-8-2021 (*Archaeological Survey,* **Appendix D**); Public Resources Code (PRC) §5020.1(j); and 14 California Code of Regulations §15064.5(a)(1)-(3).

Findings of Fact:

a) Would the Project alter or destroy a historic site?

Less Than Significant Impact with Mitigation Incorporated

The *Archaeological Survey* of the Project site included a review of an archaeological records search at the Eastern Information Center (EIC) at the University of California at Riverside in order to assess previous archaeological studies and identify any previously recorded sites within the Project boundaries, or in the immediate vicinity. The EIC records search indicated that sixteen (16) cultural resource properties are located within one mile of the Project. The records search results also indicated that there have been at least 8 cultural resource studies conducted within a one-mile radius of the Project. The cultural resources identified during the records search consists of food processing/bedrock milling sites associated with the many seasonal drainages within the area.

During the site survey conducted between April 8, 2021 and April 13, 2021, two historic-period sites, a small portion of the third historic-period site, and five prehistoric isolates were found to be located within the 50-acre Project area. The historic-period resources include two groups of buildings that are part of the Paradise Valley Ranch retreat and guest complex, a water conveyance feature, and an isolated horseshoe, as outlined below:

Ponderosa House (42730 Cactus Valley Road on the Schuster Property). This ranch house was originally built around 1952 and expanded sometime between 1967 and 1978, and the Chaparral House was added sometime during that time. This and adjoining properties were combined and eventually became known as the Paradise Valley Ranch. The facilities became a group retreat with the two houses being uses as guest lodges, and a pond added in the 1980s.

Paradise Valley Ranch (43750 Cactus Valley Road). This ranch complex dates to around 1964 although the southern portion of the property may contain an older building. Historical photos indicate two historical residences (see above regarding Ponderosa House and Chaparral House).

The residences appear associated with agricultural fields to the south across Cactus Valley Road suggesting the buildings/structures were built between 1941 and 1949 by either the Charlton or Murphy group. In 1960, Erich Schuster, believed to be a County official at one time, acquired the property along with several adjoining parcels. Historical aerial photos show as many as four buildings, all north of Cactus Valley Road, including the Hacienda House, but which appears to have been modified over time. A barn and stable were also in place by 1978.

Water Conveyance System (Site 3684-04H). The water conveyance system supplied water to the local ranch for domestic and agricultural purposes before it was replaced by a modern well water system. The materials and methods of construction associated with the cistern were common during the late 19th and early 20th centuries but do not indicate a specific installation date. The concrete cistern became obsolete following construction of the earthen levees/weirs and windmill.

Historical Isolate 3684-ISO-02H. This isolated resource is not considered unique or distinctive according to the State historical resource criteria as outlined below.

According to the CEQA Guidelines, a resource that meets one or most listing criteria of the California Register of Historic Resources (CRHR) can be considered historically significant. A resource may be listed in the CRHR if it meets any of the following criteria:

(1) Is associated with events that have made a significant contribution to the broad patterns of California history and cultural heritage.
(2) Is associated with the lives of persons important in our past.
(3) Embodies the distinctive character of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
(4) Has yielded, or may be likely to yield, information important in prehistory or history.

After a detailed review of all onsite facilities and resources, the *Archaeological Survey* determined that all the historic-period sites and the isolates do not meet any of the four CRHR criteria and thus do not meet CEQA's definition of "historical resources". Therefore, potential Project impacts on these resources will not constitute "a substantial adverse change in the significance of a historical resource" or "a significant effect on the environment" (PRC §21084.1).

Although the *Archaeological Survey* determined that it is anticipated that the Project will not impact or cause a significant impact on cultural resources, standard practices for development projects mandate the inclusion of conditions of approval that will mitigate impacts to unknown resources discovered during the course of construction. With the inclusion of **Mitigation Measure MM-CUL-3** the Project will not cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5. Any impacts will be less than significant with mitigation incorporated.

b) Would the Project cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?

Less Than Significant Impact with Mitigation Incorporated

According to Public Resources Code (PRC) §5020.1(j), "'historical resource' includes, but is not limited to, any object, building, site, area, place, record, or manuscript which is historically or

archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California."

More specifically, CEQA guidelines state that the term "historical resources" applies to any such resources listed in or determined to be eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined to be historically significant by the lead agency (Title 14 CCR §15064.5(a)(1)-(3)). Regarding the proper criteria for the evaluation of historical significance, CEQA guidelines mandate that "generally a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources" (Title 14 CCR §15064.5(a)(3)). A resource may be listed in the California Register if it meets any of the four criteria previously outlined in Threshold 8.a.

As outlined in Threshold 8.a, the cultural resources identified in the "Project area" as defined in the *Archaeological Survey* do not satisfy any of the criteria for a historic resource as defined in Section 15064.5 of the State CEQA Guidelines. In addition, the Project site itself is not listed with the State Office of Historic Preservation or the National Register of Historic Places.

However, based on input provided by the Pechanga Band regarding general historical events in the area, there is a potential for unanticipated cultural resources at this site. Based on this possibility and the historic sensitivity of the area, and to ensure impacts to potential unanticipated resources, monitoring during grading will be performed. With the inclusion of **MM-CUL-3**, the Project will not cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5. Any impacts will be less than significant with mitigation incorporated.

9. Archaeological Resources a) Alter or destroy an archaeological site?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Source(s): *Historical/Archaeological Resources Survey Report, Paradise Valley Ranch Project*, prepared by CRMTECH, 10-8-2021 (*Archaeological Survey,* **Appendix D**); Public Resources Code (PRC) §5020.1(j); Health and Safety Code § 7050.5; and 14 California Code of Regulations §15064.5(a)(1)-(3).

Findings of Fact:

a) Would the Project alter or destroy an archaeological site?

Less Than Significant Impact with Mitigation Incorporated

The *Archaeological Survey* identified the presence of five (5) cultural resources (which includes archaeological resources) within the Project area. None of these resources meet the criteria for listing in the California Register of Historic Places. However, standard practices, incorporated as mitigation measures for this Project, include Native American monitoring of any ground-disturbing

activity, as well as the handling of unknown artifacts and/or/ human remains discovered during construction and grading. **Mitigation Measures MM-CUL-1** through **MM-CUL-3** will reduce any impacts to less than significant.

b) Would the Project cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?

Less Than Significant Impact with Mitigation Incorporated

As discussed in Threshold 9.a, it has been determined that there are no significant archaeological resources as defined in California Code of Regulations, Section 15064.5. However, in the event unanticipated resources are identified, **Mitigation Measures MM-CUL-1** through **MM-CUL-3** are required in the event an unanticipated resource is identified during ground disturbing activities. Any Project impacts that could cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5 will be less than significant with mitigation incorporated.

c) Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact with Mitigation Incorporated

Based on input provided by the Pechanga Band, there is a potential for human remains to be present in the Project area.

In order to reduce potentially significant impacts to previously unknown human remains that may be unexpectedly discovered during Project implementation, County conditions of approval and State Law requires that in the unlikely event that human remains are uncovered the contractor is required to halt work in the immediate area of the find and to notify the County Coroner, in accordance with Health and Safety Code § 7050.5, who must then determine whether the remains are of forensic interest. If the Coroner, with the aid of a supervising archaeologist, determines that the remains are or appear to be of a Native American, he/she must contact the Native American Heritage Commission for further investigations and proper recovery of such remains, if necessary.

Further, pursuant to Public Resource Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "most likely descendant". The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

To further ensure compliance with the above-referenced state laws, **Mitigation Measure MM-CUL-2** shall be implemented to reduce any Project impacts that could disturb any human remains, including those interred outside of formal cemeteries to less than significant levels.

Mitigation:

MM-CUL-1 Native American Monitoring. Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor.

In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel. In addition, the Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.

The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist shall clear this condition. Monitoring: Native American Monitoring will be conducted by a representative from the consulting tribe(s).

MM-CUL-2 If Human Remains found. In the event that human remains are encountered and by ensuring that no further disturbance occur until the County Coroner has made the necessary findings as to origin of the remains. Furthermore, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made

MM-CUL-3 Unanticipated Resources. The developer/permit holder or any successor in interest shall comply with the following for the life of this permit. If during ground disturbance activities, unanticipated cultural resources* are discovered, the following procedures shall be followed:

All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representative (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource. Resource evaluations shall be limited to nondestructive analysis.

Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.

* A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other.

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

** If not already employed by the project developer, a County approved archaeologist shall be employed by theproject developer to assess the significance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.

Monitoring: A copy of all agreements between the Project developer and the appropriate Band of Luiseño Indians shall be provided to the County for retention. Field inspections by County Staff shall verify that all aspects of the agreement are being implemented by the developer, professional monitor and Tribal monitors, during ground disturbing activities. Any cultural resources reports produced as a result of Project monitoring shall be provided to the County within 60 days of completion. All reports and field notes shall be retained in the Project file. The Planning Department will also monitor any potential changes to the Project and their impacts to prehistoric resources.

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

Source(s): *Paradise Valley Ranch Energy Conservation Analysis County of Riverside,* prepared by RK Engineering Group, Inc., 7-23-2021 (*Energy Analysis*, **Appendix E**); *Paradise Valley Ranch Trip Generation Analysis*, prepared by RK Engineering Group, Inc., 10-8-2021(*Trip Generation Analysis*, **Appendix J1**); *Paradise Valley Ranch Vehicle Miles Traveled Analysis*, prepared by RK Engineering Group, Inc., 10-8-2021(*VMT Analysis*, **Appendix J2**); and *Paradise Valley Ranch Air Quality and Greenhouse Gas Analysis*, prepared by RK Engineering Group, Inc., 7-23-2021 (*AQ/GHG Study,* **Appendix B**).

Note: Any tables or figures in this section are from the *Energy Analysis*, unless otherwise noted.

Findings of Fact:

a) Would the Project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

Less Than Significant Impact

Background Information

There are many different types and sources of energy produced and consumed in the United States. The U.S. Energy Information Administration (EIA) categorizes energy by primary and secondary sources, renewable and nonrenewable sources, and by the different types of fossil fuels. Primary energy is captured directly from natural resources and includes fossil fuels, nuclear energy, and renewable sources of energy. Electricity is a secondary energy source that results from the transformation of primary energy sources.

A renewable energy source includes solar energy from the sun, geothermal energy from heat inside the earth, wind energy, biomass from plants, and hydropower from flowing water. Nonrenewable energy sources include petroleum products, hydrocarbon gas liquids, natural gas, coal, and nuclear energy.

Fossil fuels are non-renewable resources formed by organic matter over millions of years and include oil, coal and natural gas. The EIA defines the five energy consuming sectors within the United States as follows:

- **Industrial Sector:** Includes facilities and equipment used for manufacturing, agriculture, mining, and construction.
- **Transportation Sector:** Includes vehicles that transport people or goods, such as cars, trucks, buses, motorcycles, trains, aircraft, boats, barges, and ships.
- **Residential Sector**: Includes homes and apartments.
- **Commercial Sector:** Includes offices, malls, stores, schools, hospitals, hotels, warehouses, restaurants, and places of worship and public assembly.
- **Electric Power Sector**: Consumes primary energy to generate most of the electricity the other four sectors consume.

Energy sources are measured in different physical units: liquid fuels are measured in barrels or gallons, natural gas in cubic feet, coal in short tons, and electricity in kilowatts and kilowatt-hours. In the United States, British thermal units (Btu), a measure of heat energy, is commonly used for comparing different types of energy to each other.

Project Energy Consumption

According to the *Energy Study*, the three (3) main types of energy expected to be consumed by the Project include electricity, natural gas, and petroleum products in the form of gasoline and diesel fuel. Energy usage for the proposed Project is calculated based on the *AQ/GHG Study*. The California Emissions Estimator Model Version 2016.3.2 (CalEEMod) is used to calculate energy usage from Project construction and operational activities.

Electricity Consumption

The Project will use electricity for many different operational activities including, but not limited to, building heating and cooling, lighting, appliances, electronics, mechanical equipment, electric vehicle charging, and parking lot lighting. Indirect electricity usage will also be required to supply, distribute, and treat water and wastewater. Electricity will be provided to the site by Southern California Edison and private solar. It should be noted the proposed facilities will have private solar equipment installed which will help reduce the consumption of electrical energy from the regional grid during the day. However, the consumption of electricity estimated below assumes no onsite solar equipment. Therefore, the electrical use shown in **Table 10-1, *Project Electricity Consumption*** is a “worst case” estimate,

Temporary electricity usage for construction activities may include lighting, electric equipment and mobile office uses, however, CalEEMod does not calculate electricity usage during construction. Electricity usage during construction is expected to be short-term and relatively minor compared to the operational demand, and therefore electricity usage during construction is not counted in this analysis.

Table 10-1, *Project Electricity Consumption*, shows the Project's estimated operational electricity consumption in kilowatt-hours per year (kWh/year) and millions of Btu per year.

Table 10-1
Project Electricity Consumption

Land Use/Activity	Electricity Consumption[1]	
	(kWhr/yr)	(MBtu/yr)
Project Total	290,433.00	990.96

[1] kWhr/yr. = Kilowatt Hours per Year; MBtu/yr = Million British Thermal Units per Year.

Propane Consumption

The Project is expected to use propane for building heating and cooling, cooking and kitchen appliances and water heating. The Project is not anticipated to have natural gas supplied to the site. All propane used by the Project is expected to be imported and stored on-site via on-site storage tanks. Propane is not expected to be used during construction in any significant quantities and is not included in the overall calculation of the Project's propane consumption. It should be noted that the CalEEMod do not provide propane consumption. Therefore, for the purpose of this analysis, it is assumed that the Project uses same amount BTUs for propane consumption as is reported for natural gas in CalEEMod. **Table 10-2, *Project Natural Gas Consumption***, shows the Project's estimated operational natural gas consumption in millions of Btu per year.

Table 10-2
Project Natural Gas Consumption

Land Use/Activity	Consumption (MBtu/yr.)[1]
Project Total	302.99

[1] MBtu/yr. = Million British Thermal Units per Year.

Petroleum Consumption

The Project's energy consumption from petroleum products is primarily associated with transportation related activities. This includes gasoline and diesel fuel used for auto and truck trips and off-road equipment during construction and operation and off-road equipment usage during construction.

Construction

Construction of the Project is estimated (worst-case) to last at most 15 months and consist of site preparation, grading, building construction, paving, and architectural coating phases. Construction activities will consume energy in the form of motor vehicle fuel (gasoline and diesel) for off-road construction equipment and on-road vehicle trips. Vehicle trips include workers and vendors traveling to and from the job-site. **Table 10-3, *Construction Off-Road Equipment Energy Consumption***, shows the Project's energy consumption for all off-road equipment during construction. For purposes of this analysis, all off-road equipment is assumed to run on diesel fuel. **Table 10-4, *Construction On-Road Trips Energy Consumption***, shows the Project's energy consumption from on-road vehicle trips during construction.

Table 10-3
Construction Off-Road Equipment Energy Consumption

Construction Activity	Diesel Fuel Consumption[1]	
	gallons	MBtu/yr
Demolition	3,778.2	519.048
Site Preparation	4,756.3	653.429
Grading	15,560.0	2,137.648
Building Construction	25,002.2	3,434.822
Paving	4,584.5	629.820
Architectural Coatings	607.1	83.409
TOTAL	**54,288.3**	**7,458.175**

[1] MBtu/yr = Millions of Btu per year; assuming 1 gallon of diesel fuel = 137,381 Btu.

Table 10-4
Construction On-Road Equipment Energy Consumption

Construction Activity	Fuel Consumption[1]		
	Gasoline (gal)	Diesel (gal)	MBtu/yr
Demolition	277.91	1.64	33.69
Site Preparation	416.86	2.46	50.54
Grading	795.02	3.09	96.17
Building Construction	187,625.51	729.25	22,695.74
Paving	477.01	1.85	57.70
Architectural Coatings	9,381.28	36.46	1,134.79
Vendor Trips	6,674.36	102,027.49	14,820.43
TOTAL	**205,370.04**	**102,802.25**	**38,889.05**

[2] MBtu/yr = Millions of Btu per year; assuming 1 gallon of gasoline fuel = 120,429 Btu and 1 gallon of diesel fuel = 137,381 Btu

Operation

The Project is expected to consume energy from auto and truck trips generated by the proposed land uses, as described in the *TIA* and the *AQ/GHG Study*. Operational vehicle trips are associated with workers, customers and vendors/non-workers (i.e., delivery, service, maintenance vehicles, etc.) traveling to and from the site. **Table 10-5, *Operational Trips Energy Consumption***, shows the Project's energy consumption for all operational trips generated by the Project on an annual basis.

Table 10-5
Operational Trip Energy Consumption

Mitigated Annual VMT for All Vehicle Types	Fuel Consumption[1]		
	Gasoline (gal)	Diesel (gal)	MBtu/yr
1,226,318	**47,346.41**	**18,021.94**	**8,177.75**

[1] MBtu/yr = Millions of Btu per year; assuming 1 gallon of gasoline fuel = 120,429 Btu and 1 gallon of diesel fuel = 137,381 Btu

Total Project Energy Consumption

The Project's total energy consumption is calculated in MBtu and shown in **Table 10-6, *Total Project Energy Consumption***. Total Project energy consumption includes electricity, natural gas and petroleum usage during construction and operation. The Project will be required to comply with the mandatory requirements of California's Building Energy Efficiency Standards (Title 24, Part 6) and Green Building Standards (CALGreen, Title 24, Part 11). California's building energy efficiency standards are some of the strictest in the nation and the Project's compliance with California's building code will ensure that wasteful, inefficient or unnecessary consumption of energy is minimized. The building standards code is designed to reduce the amount of energy needed to heat or cool a building, reduce energy usage for lighting and appliances and promote usage of energy from renewable sources.

Table 10-6
Total Project Energy Consumption

Activity	Total Energy Consumption (MBtu)[1]
Construction[2]	**46,337.225**
Off-Road Equipment	7,458.175
On-Road Vehicle Trips	38,889.05
Operational	**7,798.01**
Electricity	990.96
Natural Gas	302.99
Petroleum	6,504.06

[1] MBtu = Millions of Btu
[2] MBtu/yr = Millions of Btu per year
[3] Assumes all construction activity will occur within one year timespan.

Project Impacts

The Project will implement the mandatory requirements of California's Building Energy Efficiency Standards (Title 24, Part 6) and Green Building Standards (CALGreen, Title 24, Part 11). California's building energy efficiency standards are some of the strictest in the nation and the project's compliance with California's building code will ensure that wasteful, inefficient or unnecessary consumption of energy is minimized. The building standards code is designed to reduce the amount of energy needed to heat or cool a building, reduce energy usage for lighting and appliances and promote usage of energy from renewable sources.

b) Would the Project conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?

Less Than Significant Impact

The Project will purchase electricity through Southern California Edison which is subject to the requirements of California Senate Bill 100 (SB 100). SB 100 is the most stringent and current energy legislation in California, requiring that renewable energy resources and zero-carbon resources

supply 100% of retail sales of electricity to California end-use customers and 100% of electricity procured to serve all state agencies by December 31, 2045.

The Project will further comply with the mandatory requirements of California's Green Building and Building Energy Efficiency standards that promote renewable energy and energy efficiency; refer to Threshold 10.a. Therefore, the Project will not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Impacts are considered less than significant, and no mitigation is required.

The *Energy Study* recommended implementation of eight (8) "project design features" (DF-1 through DF-8) that would further reduce wasteful, inefficient and unnecessary consumption of energy during Project construction and operation. With implementation of the state building code standards and **Project Design Features ENERGY-DF-1** through **ENERGY-DF-8**, the Project will not result in wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Therefore, impacts in this regard will be less than significant and no mitigation is required.

Construction Design Features:

ENERGY-DF-1 Construction equipment shall be maintained in proper tune.

ENERGY-DF-2 All construction vehicles shall be prohibited from excessive idling. Excessive idling is defined as five (5) minutes or longer.

ENERGY-DF-3 Establish an electricity supply to the construction site and use electric powered equipment instead of diesel-powered equipment or generators, where feasible.

Operational Design Features:

ENERGY-DF-4 Comply with the mandatory requirements of Title 24 Part 11 of the California Building Standards Code (CALGreen) and the Title 24 Part 6 Building Efficiency Standards.

ENERGY-DF-5 Implement water conservation strategies, including low flow fixtures and toilets, water efficient irrigation systems, drought tolerant/native landscaping, and reduce the amount of turf.

ENERGY-DF-6 Use electric landscaping equipment, such as lawn mowers and leaf blowers, where feasible.

ENERGY-DF-7 Provide the necessary infrastructure to support electric vehicle charging, as required by CALGreen.

ENERGY-DF-8 Utilize solar renewable energy to supply the project's electricity demand to the maximum extent feasible.

Mitigation: No mitigation measures are required.

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

Monitoring: No mitigation monitoring is required.

GEOLOGY AND SOILS Would the Project directly or indirectly:				
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?	☐	☐	☐	☒

Source(s): *Map My County* (**Appendix A**); *Geotechnical Investigation, Paradise Valley Ranch,* prepared by Sladden Engineering, 3-10-2021 (*Geo Investigation*, **Appendix F1**); and Riverside County General Plan, Chapter 6, Safety Element, Figure S-2 *Earthquake Fault Study Zones*.

Note: Any tables or figures in this section are from the *Geo Investigation*, unless otherwise noted.

Findings of Fact:

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?

No Impact

The Project site is not located within an Alquist-Priolo Earthquake Fault Zone. There are no active faults geologically mapped within five miles of the Project site.

Furthermore, the Project site is not located within a County or State-mandated "fault hazard investigation zone", as shown on the General Plan, Chapter 6, Safety Element, Figure S-2 *Earthquake Fault Study Zones*.

The Project site development plan does not propose any structures in the vicinity of the unnamed fault; therefore, no potential impact from surface rupture is anticipated.

There will be no impacts and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

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

Source(s): *Map My County* (**Appendix A**); *Geotechnical Investigation, Paradise Family Ranch,* prepared by Sladden Engineering, 3-10-2021 (*Geo Investigation*, **Appendix F1**); *Paradise Valley Ranch Percolation Testing for On-Site Sewage Disposal Feasibility,*

prepared by Sladden Engineering, 3-10-2021 (*Infiltration Report*, **Appendix F2**); Riverside County General Plan, Chapter 6, Safety Element, Figure S-3 *Generalized Liquefaction*; and County of Riverside, Ordinance No. 457 (An Ordinance of the County of Riverside amending ordinance no.457 relating to building requirements and adopting as amended, including any errata and supplements, the 2019 California administrative code, the 2019 California building code, the 2019 California residential code, the 2019 California electrical code, the 2019 California mechanical code, the 2019 California plumbing code, the 2019 California energy code, the 2019 California historic building code, the 2019 California green building standards code; declaring as a public nuisance all substandard buildings and portions thereof; implementing the procedures required by the state ord. 457.105 – page 2 housing law; and, incorporating the abatement cost recovery procedures of Riverside County Ordinance).

Findings of Fact:

a) Be subject to seismic-related ground failure, including liquefaction?

Less Than Significant Impact

Liquefaction commonly occurs when three conditions are present on-site simultaneously:

(1) Relatively loose, cohesionless (sandy) soil;
(2) High groundwater; and
(3) Earthquake-generated seismic waves.

The presence of these conditions may cause a loss of shear strength and, in many cases, the settlement of subsurface soils.

Subsurface exploration at the Project site was conducted on December 30, 2020, February 16, 2021, and February 23, 2021, by Sladden Engineering in conjunction with both the *Geo Investigation* and the *Infiltration Report*.

The *Geo Investigation* determined that the possibility of liquefaction on the Project site is negligible, based on the presence of shallow seated bedrock, and previous studies in the Project vicinity.

With respect to the *Infiltration Report*, fifteen exploratory test holes, three (3) test pits, and six (6) boreholes to depths between approximately five (5) and thirty-four (34) feet were conducted to evaluate the subsurface earth materials. The exploratory holes were excavated and logged (see Appendix A of the *Infiltration Report*). Groundwater was not observed at the Project site conducted to a maximum depth of fifteen (15) feet.

California Building Code (CBC) requirements pertaining to new development and construction will minimize the potential for structural failure or loss of life during earthquakes by ensuring that the proposed Project site structures are constructed pursuant to applicable seismic design criteria for the region. CBC requirements are applicable to all development; therefore, they are not considered mitigation for CEQA implementation purposes. In addition, the proposed Project site shall development complies with the *Geo Investigation*. This is also a standard condition and is not considered mitigation for CEQA implementation purposes.

With adherence to these standard conditions, any potential impacts to the Project from seismic-related ground failure, including liquefaction, will be reduced to a less than significant level.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

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

Source(s): *Map My County* (**Appendix A**); *Geotechnical Investigation, Paradise Valley Ranch,* prepared by Sladden Engineering, 3-10-2021 (*Geo Investigation*, **Appendix F1**); Riverside County General Plan Figure S-4 "Earthquake-Induced Slope Instability Map;" and Ordinance No. 457.

Findings of Fact:

a) Be subject to strong seismic ground shaking?

Less Than Significant Impact

The Project site, as well as the surrounding Cactus Valley area, is in a seismically active area, and thus will likely be affected by regional ground shaking. In general, the entire southern California area is dominated by northwest-trending faults associated with the San Andreas fault system. The San Andreas accommodates most right-lateral relative motion between the Pacific and North American plates. In the Project's area, the dominant faults are part of the San Jacinto system, the main trace of which traverses directly through Hemet and San Jacinto.

As previously set forth in Threshold 11.a, the Project site is not located within an Alquist-Priolo Earthquake Fault Zone and there are no active faults geologically mapped within or projecting toward the Project site.

The Project site is not located within a County or State-mandated "fault hazard investigation zone."

The nearest known "active faults" are part of the San Jacinto system, the closest of which is located approximately 3 miles northeast of the Project site and which according to the *Geo Investigation* is capable of producing a 7.2 maximum earthquake on the Richter Scale.

The nearest known faults to the Project site are summarized in **Table 13-1, *Closest Known Active Faults***.

The Project site could be subjected to moderate ground shaking in the event of a major earthquake on significant faults in the southern California and northern Baja California area.

Table 13-1
Closest Known Active Faults

Fault – Section Name	Approximate Distance from Project Site		Slip Rate Category	Slip Rate (Millimeters/Year)	Probable Magnitude
	Miles	Kilometers			
Elsinore Fault					
Temecula Section	19.0	30.6	Btw 1.0 and 5.0	5.00	6.8
Julian Section	21.1	34.0	Btw 1.0 and 5.0	5.00	7.1
Glen Ivy Section	25.8	41.5	>5.0 mm/yr.	5.00	6.8
San Jacinto Fault					
Anza Section	8.4	5.2	>5.0 mm/yr.	12.00	7.2
San Jacinto Valley Section	5.0	8.1	>5.0 mm/yr.	12.00	6.9
San Andreas Fault					
San Bernardino Mountains Section	22.8	36.7	>5.0 mm/yr.	14 – 30	7.5
Coachella Section	22.8	36.7	>5.0 mm/yr.	23 – 35	7.2

Source(s):
1 Quaternary Fault and Fold Database of the United States, Earthquake Hazards Program, U.S. Geological Survey (USGS); https://earthquake.usgs.gov/hazards/qfaults/.
2 Caltech's Southern California Earthquake Date Center (SCEDC); http://scedc.caltech.edu/significant/sanandreas.html, http://scedc.caltech.edu/significant/sanjacinto.html, and http://scedc.caltech.edu/significant/elsinore.html.
3 Appendix F: Summary of Geologic Data and Development of A Priori Rupture Models for the Elsinore, San Jacinto, and Garlock Faults, USGS Open File Report 2007-1437F, CGS Special Report 203F, SCEC Contribution #1138F, Version 1.0, 2008, U.S. Department of the Interior, U.S. Geological Survey California Department of Conservation, California Geological Survey; https://pubs.usgs.gov/of/2007/1437/f/of2007-1437f.pdf.
4 Google Earth/KML Files for Quaternary Faults and Folds in the U.S.; https://earthquake.usgs.gov/learn/kml.php

Due to the absence of any active faults mapped faults across the Project site, no potential impact from surface rupture at the Project site is anticipated.

The Project site is located within an area mapped by Riverside County as having no potential for liquefaction.

Subsidence resulting from scarification and recompaction of bottom excavations is expected to be negligible. Furthermore, in areas to receive compacted fill, the removal of low density, compressible soils, such as undocumented artificial fill and topsoil, should continue until firm competent bedrock is encountered. The *Geo Investigation* determined that the risk of subsidence in the project site is "negligible".

California Building Code (CBC) requirements pertaining to new development and construction will minimize the impacts from strong seismic ground shaking by ensuring that the proposed Project site structures are constructed pursuant to applicable seismic design criteria for the region. CBC requirements are applicable to all development; therefore, they are not considered mitigation for CEQA implementation purposes. In addition, the proposed Project site shall development complies with the *Geo Investigation*. This is also a standard condition and is not considered mitigation for CEQA implementation purposes.

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

With adherence to these standard conditions, any potential impacts to the Project from strong seismic ground shaking, will be reduced to less than significant level and no mitigation is required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): *Map My County* (**Appendix A**); *Geotechnical Investigation, Paradise Valley Ranch,* prepared by Sladden Engineering, 3-10-2021 (*Geo Investigation*, **Appendix F1**); Riverside County General Plan, Chapter 6, Safety Element, Figure S-5 *Regions Underlain by Steep Slope*.

Findings of Fact:

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

According to the *Geo Investigation*, no landslide debris was observed during the field exploration and no ancient landslides are known to exist on the Project site. Additionally, the investigation concluded that the risks associated with slope stability will be “low”.

The site is generally in a valley but does have some structures on the hillsides above the valley floor. There are no existing on-site cut or fill slopes greater than ten (10) feet in height or steeper than 2:1 (horizontal:vertical). Furthermore, the Project site development plan does not propose the creation of cut or fill slopes greater than ten (10) feet in height or steeper than 2:1 (horizontal:vertical).

Based on the above, the Project site’s proposed development plan will not 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. There will be no impacts and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

	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?	☐	☐	☒	☐

Source(s): *Map My County* (**Appendix A**); *Geotechnical Investigation, Paradise Valley Ranch,* prepared by Sladden Engineering, 3-10-2021 (*Geo Investigation*, **Appendix F1**); Riverside County General Plan, Chapter 6, Safety Element, Figure S-7 *Documented Subsidence Areas Map*; and Ordinance No. 457.

Findings of Fact:

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?

Less Than Significant Impact

Subsidence refers to the sudden sinking or gradual downward settling and compaction of soil and other surface material with little or no horizontal motion. It may be caused by a variety of human and natural activities, including earthquakes.

Subsidence typically occurs throughout a susceptible valley. In addition, differential displacement and fissures occur at or near the valley margin, and along faults. In the County of Riverside, the worst damage to structures as a result of regional subsidence may be expected at the valley margins. Alluvial valley regions are especially susceptible.

The three requirements for liquefaction to occur include seismic shaking, poorly consolidated cohesionless sands, and groundwater. Liquefaction results in a substantial loss of shear strength in loose, saturated, cohesionless soils subjected to earthquake induced ground shaking. Potential impacts from liquefaction include loss of bearing capacity, liquefaction related settlement, lateral movements, and surface manifestation in the form of sand boils.

The potential for design level earthquake induced liquefaction and lateral spreading to occur beneath the proposed structure on the Project site is considered very low to remote due to the recommended compacted fill and the shallow bedrock.

CBC requirements pertaining to new development and construction will minimize the impacts from the Project being 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, by ensuring that the proposed Project site structures are constructed pursuant to applicable seismic design criteria for the region. CBC requirements are applicable to all development; therefore, they are not considered mitigation for CEQA implementation purposes. In addition, the proposed Project site shall development complies with the *Geo Investigation*. This is also a standard condition and is not considered mitigation for CEQA implementation purposes.

With adherence to these standard conditions, any potential impacts to the Project from being 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, will be reduced to less than significant level and no mitigation is required.

	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.

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

Source(s): *Geotechnical Investigation, Paradise Valley Ranch,* prepared by Sladden Engineering, 3-10-2021 (*Geo Investigation*, **Appendix F1**); Google Maps; and **Figure 3, *Aerial Photo***, provided in Section I of this IS.

Findings of Fact:

a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?

No Impact

Seismically induced flooding is normally associated with a tsunami (seismic sea wave), a seiche (i.e., a wave-like oscillation of surface water in an enclosed basin that may be initiated by a strong earthquake) or failure of a major reservoir or retention system up gradient of the site. As a result of the site being at an elevation of more than 1,000 feet above mean sea level and being approximately 30 more than 20 miles inland from the nearest coastline of the Pacific Ocean, the potential for seismically induced flooding due to a tsunami is considered remote. The likelihood of induced flooding due to a seiche overcoming a dam's freeboard is considered remote. In addition, it is considered remote that any major reservoir up gradient of the Project site would be compromised to a point of failure.

Based on the above, implementation of the Project would not be subject to geologic hazards, such as tsunami, or seiche.

There are no volcanic hazards in proximity of the Project site. Any mudflows associated with a volcanic hazard is not applicable to the Project.

The Project site is not subject to geologic hazards, such as seiche, mudflow, or volcanic hazard. There will be no impacts and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation 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?	☐	☐	☒	☐

Source(s): *Map My County* (**Appendix A**); *Geotechnical Investigation, Paradise Valley Ranch,* prepared by Sladden Engineering, 3-10-2021 (*Geo Investigation*, **Appendix F1**); Project Plans (**Appendix L**); and Ordinance No. 457.

Findings of Fact:

a) Change topography or ground surface relief features?

Less Than Significant Impact

The site is located within the Cactus Valley southeast of the City of Hemet. All of the proposed development will occur on the relatively flat areas in the southwest portion of the property. There are no existing on-site cut or fill slopes greater than ten (10) feet in height or steeper than 2:1 (horizontal:vertical). Furthermore, the Project site development plan does propose the creation of cut or fill slopes greater than ten (10) feet in height but will not be steeper than 2:1 (horizontal:vertical).

Two new facilities will be constructed on the project site; a new treatment facility and a new administrative office building. Each of these facilities will be constructed with the requisite amount of parking. However, no new slopes of ten (10) feet in height or steeper than 2:1 (horizontal:vertical).

The Project will result in minor changes to the topography and surface relief features. These changes will be required in order to re-contour the Project topography in a manner to accommodate the Project.

As designed, the changes to the topography and ground surface relief features will be in keeping with the existing and proposed physical developments adjacent to the Project site. Any impacts are considered less than significant.

b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?

Less Than Significant Impact

No cut or fill slopes greater than 2:1 or higher than 10 feet are being proposed in conjunction with the proposed Project.

CBC requirements (as implemented through Ordinance No. 457) pertaining to new development and construction will minimize the potential for structural failure or loss of life due to geological constraints by ensuring that structures are constructed pursuant to applicable seismic design criteria for the region. CBC requirements are applicable to all development; therefore, they are not considered mitigation for CEQA implementation purposes. In addition, the Project will be required to comply with the Geo Investigation and the report's various recommendations.

The County of Riverside Building and Safety Department has standard conditions that apply to manufactured slopes which require the Project applicant to plant and irrigate all manufactured slopes equal to or greater than 3 feet in vertical height with drought tolerant grass or ground cover; slopes 15 feet or greater in vertical height shall also be planted with drought tolerant shrubs or trees in accordance with the requirements of Ordinance 457 and the current CBC. Impacts will be less than significant, and no mitigation is required.

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

c) Result in grading that affects or negates subsurface sewage disposal systems?

Less Than Significant Impact

The Project site is currently serviced by subsurface septic systems for the existing facilities. The new facilities will be proximate to the existing structures and will utilize subsurface sewage disposal systems (septic systems). The Project will expand / enhance the existing subservice septic system currently in place, subject to design and permitting requirements of the County Department of Environmental Health. The County of Riverside Building and Safety Department has standard conditions that will prevent impacts on existing or proposed septic systems. No portion of the proposed Project will result in grading that affects or negates subsurface sewage disposal systems. Impacts will be less than significant, and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

18. Soils				
a) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐

Source(s): Site visit by Matthew Fagan on September 9, 2020; *Map My County* (**Appendix A**); *Geotechnical Investigation, Paradise Valley Ranch,* prepared by Sladden Engineering, 3-10-2021 (*Geo Investigation*, **Appendix F1**); *Paradise Valley Ranch Percolation Testing for On-Site Sewage Disposal Feasibility,* prepared by Sladden Engineering, 3-10-2021 (*Infiltration Report*, **Appendix F2**); *CUP-21-0005 Well and Septic Exhibit,* prepared by 4M Engineering and Development, Inc., 10-1-2021 (**Appendix F3**); and Ordinance No. 457.

Findings of Fact:

a) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact

Subsurface exploration at the Project site was conducted on December 30, 2020, February 16, 2021, and February 23, 2021, by Sladden Engineering in conjunction with both the *Geo Investigation* and the *Infiltration Report*.

The subsurface conditions at the site were investigated by excavating a total of fourteen (14) exploratory test holes, three (3) test pits and six (6) boreholes to depths between approximately five (5) and thirty-four (34) feed bgs.

Site grading will create the potential for the proposed Project to result in soil erosion or the loss of topsoil. The County of Riverside Building and Safety Department has standard conditions, as they apply to manufactured slopes. In addition, wind erosion will be minimized through mandated soil stabilization measures by South Coast Air Quality Management District (SCAQMD) Rule 403 (Fugitive Dust), such as daily watering.

Lastly, water erosion will be prevented through the County's standard, mandated, erosion control practices required pursuant to the CBC, and the National Pollution Discharge Elimination System (NPDES), such as silt fencing, fiber rolls, or sandbags.

Therefore, based upon the required compliance with these regulations and County ordinances, impacts related to soil erosion will be less than significant and no mitigation is required.

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?

Less Than Significant Impact

Preliminary laboratory test results indicate that the soils onsite exhibit a VERY LOW expansion potential as classified by the 2019 CBC Section 1803.5.3. Since the onsite soils exhibit expansion indices of 20 or less, the design of slab on grade foundations is exempt from the procedures outlined in Section 1808.6.1 or 1808.6.2. Consistent with Ordinance No. 457, each building pad will be evaluated for its expansive potential and foundation design parameters will be incorporated.

California Building Code (CBC) requirements (as implemented through Ordinance No. 457) pertaining to new development and construction will minimize the potential for structural failure or loss of life during earthquakes by ensuring that structures are constructed pursuant to applicable seismic design criteria for the region. CBC requirements are applicable to all development; therefore, they are not considered mitigation for CEQA implementation purposes.

The Project would not be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), creating substantial risks to life or property; with adherence to listed regulations and County ordinances, impacts would remain less than significant level and no mitigation is required.

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

Less Than Significant Impact

The Project is proposing an onsite water treatment system (OWTS). A total of eight (8) percolation tests were conducted on May 4 to 8, 2019 to evaluate the feasibility of utilizing leach fields for onsite wastewater treatment. As set forth in the OWTS Report, there is sufficient area on the lot to support a primary and expansion OWTS that will meet the current standards of the County Department of Environmental Health and the Regional Water Quality Control Board. New or expanded septic systems onsite will require future permitting approval by the County Department of Environmental Health.

With aggregate waste flows significantly greater than 1200 gallons per day but not exceeding 10,000 gallons per day, advanced on-site wastewater treatment will be required within this area to provide adequate protection to the ground water basin from the anticipated waste flows. The advanced on-site wastewater treatment must meet National Sanitation Foundation (NSF) performance standards of 40 and 245. All pretreatment equipment must be certified by the NSF as well as the County's Health Department permitting. These are covered by conditions of approval which is considered regulatory compliance and not unique mitigation under CEQA. Therefore, impacts will be less than significant, and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation 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?	☐	☐	☒	☐

Source(s): *Map My County* (**Appendix A**); Riverside County General Plan Figure S-8 "Wind Erosion Susceptibility Map;" Ordinance No. 484 (An Ordinance of the County of Riverside for the Control of Blowing Sand); and Ordinance No. 457.

Findings of Fact:

a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?

Less Than Significant Impact

The proposed Project site is located in an area of "Moderate Wind Eroding" rating. Implementation of the proposed Project may be impacted by or result in an increase in wind erosion and blowsand, either on or off site.

All grading shall conform to the California Building Code, Ordinance No. 457, and all other relevant laws, rules, and regulations governing grading in Riverside County and prior to commencing any grading which includes 50 or more cubic yards, the applicant shall obtain a grading permit from the Building and Safety Department. This is a standard condition for the County of Riverside and is not considered mitigation for CEQA implementation purposes.

The Project will be required to implement a Storm Water Pollution Prevention Plan (SWPPP) to address wind erosion and blow sand during the construction process. The SWPPP is required by the California Regional Water Quality Board and the NPDES General Permit Number R8-2010-0033 (County MS4 Permit). As part of the SWPPP, the Project will implement construction BMPs per the California Stormwater Quality Association Construction BMP Handbook that are used to control wind erosion and blow sand, as well as stormwater runoff. This is a standard condition for the County of Riverside as well as compliance with required state regulations and is not considered mitigation for CEQA implementation purposes.

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

With the inclusion of these standard conditions, any impacts from implementation of the proposed Project related to an increase in wind erosion and blowsand, either on- or off-site, will remain less than significant and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

GREENHOUSE GAS EMISSIONS Would the Project:				
20. Greenhouse Gas Emissions				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Source(s): *Paradise Valley Ranch Air Quality and Greenhouse Gas Impact Study County of Riverside,* prepared by RK Engineering Group, Inc., 7-23-2021 (*AQ/GHG Study*, **Appendix B**); County of Riverside, Climate Action Plan Update, November 2019.

Note: Any tables or figures in this section are from the *AQ/GHG Study*, unless otherwise noted.

Findings of Fact:

a) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact

The Riverside County 2019 Climate Action Plan (CAP) Update was adopted by the County Board of Supervisors (BOS) on December 17, 2019. The 2019 CAP Update refines the County's efforts to meet greenhouse gas (GHG) reduction strategies, specifically for the years 2035 and 2050. The 2019 CAP Update builds upon the GHG reduction strategies set forth in the initial 2015 Climate Action Plan.

Following the State's adoption of Assembly Bill 32 (AB 32) in 2006, the California Air Resources Board (ARB) developed a climate change scoping plan that included directives for local governments to reduce GHG emissions associated with land use 15 percent below baseline levels by 2020.

The passage of AB 32, the California Global Warming Solutions Act of 2006, marked a watershed moment in California's history. By requiring in law, a sharp reduction of greenhouse gas (GHG) emissions, California set the stage for its transition to a sustainable, low carbon future. AB 32 is the first program in the country to take a comprehensive, long-term approach to addressing climate change, and does so in a way that aims to improve the environment and natural resources while maintaining a robust economy.

The County adopted its first Climate Action Plan in 2015 that included GHG inventories of community-wide and municipal sources using the baseline data for the year 2008. The 2015 CAP included the GHG reduction target of 15 percent below 2008 levels by 2020. The inventory baseline year 2008, was established as a starting point against which other inventories may be compared and targets may be set and was the earliest year with a full emissions inventory. As recommended in the AB 32 Scoping Plan, the County had set a target to reduce emissions back to 1990 levels by the year 2020. Based on the County's socio-economic growth projections per the 2015 General Plan Update, this target was calculated as a 15 percent decrease from 2008 levels by 2020 and was determined sufficient for the County to meet the AB 32 target.

The CAP Update sets a target to reduce community-wide GHG emission emissions by 15 percent from 2008 levels by 2020, 49 percent by 2030, and 83 percent by 2050. The California Air Resources Board (CARB) Scoping Plan outlines the reduction strategies designed to meet the State-wide reduction goal of AB 32.

The implementation mechanisms for the CAP/CAP Update are the Screening Tables for New Development. The Screening Tables allow new development projects a streamlined option for complying with CEQA requirements for addressing GHG emissions. Additionally, Riverside County's Climate Action Plan details policies to reduce emissions from municipal and community-wide sources; including emissions from existing buildings and new development.

Projects have the option of preparing a project-specific technical analysis to quantify and mitigate GHG emissions. A threshold level above 3,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year will be used to identify projects that require the use of Screening Tables or a project-specific technical analysis to quantify and mitigate project emissions. The screening tables are setup similar to a checklist, with points allocated to certain elements that reduce greenhouse gas emissions. If a project garners 100 points (by including enough GHG reducing elements), then the project is consistent with Riverside County's plan for reducing emissions.

Construction Greenhouse Gas Emissions

Greenhouse gas emissions are estimated for on-site and off-site construction activity using CalEEMod. **Table 20-1, *Construction Greenhouse Gas Emissions***, shows the construction greenhouse gas emissions, including equipment and worker vehicle emissions for all phases of construction of the proposed Project. Construction emissions are averaged over 30 years and added to the long-term operational emissions, pursuant to SCAQMD recommendations.

Table 20-1
Construction Greenhouse Gas Emissions

Activity	Emissions ($MTC0_2e$/yr.)[1]		
	On-site	**Off-site**	**Total**
Site Preparation	33.71	2.14	35.85
Grading	54.94	2.38	57.32
Building Construction	291.37	2,607.18	2,898.55
Paving	20.19	1.72	21.91
Architectural Coating	2.56	21.69	24.25
Total	**402.77**	**2,635.11**	**3,037.88**
Averaged over 30 years[2]	**13.43**	**87.84**	**101.26**

[1] $MTCO_2e$/yr. = metric tons of carbon dioxide equivalents per year.
[2] The emissions are amortized over 30 years and added to the operational emissions, pursuant to SCAQMD recommendations.

Operational Greenhouse Gas Emissions

Greenhouse gas emissions for the proposed Project are estimated for on-site and off-site operational activity using CalEEMod. Greenhouse gas emissions from mobile sources, area sources and energy sources are shown below in **Table 20-2, *Operational Greenhouse Gas Emissions***.

Table 20-2
Operational Greenhouse Gas Emissions

Emission Source	GHG Emissions ($MTCO_2e$/yr.)[1]
Mobile Source	533.81
Energy Source	109.13
Area Source	1.78
Water	43.95
Waste	12.76
Construction (30-year amortization)	101.26
Total Annual Emissions	**802.69**
Riverside County CAP Screening Threshold	3,000
Exceed CAP Threshold?	**No**

[1] $MTCO_2e$/yr. = metric tons of carbon dioxide equivalents per year.

The analysis first compares the Project's GHG emissions to the SCAQMD's Tier 3 approach, which limits GHG emissions to 3,000 $MTCO_2e$. As shown in **Table 20-2**, Project GHG emissions are expected to be 802.7 MTCO2e/year which is well below the 3,000 $MTCO_2e$ threshold based on the unmitigated business as usual scenario.

In addition, the Project shall comply with **Project Design Features AQ/GHG-DF-1** through **AQ/GHG-DF-17**. Compliance with **Project Design Features AQ/GHG-DF-1** through **AQ/GHG-DF-17** are considered standard requirements and included as part of the Project's design features, not unique mitigation under CEQA.

Therefore, the proposed Project will not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Any impacts will be less than significant, and no mitigation is required.

b) Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact

The Riverside County CAP has been adopted to ensure the County meets the State-wide policies for reducing GHG emissions, as required by the California Global Warming Solutions Act (AB 32).

A threshold level above 3,000 $MTCO_2e$ per year is used to identify projects that require the use of Screening Tables or a project-specific technical analysis to quantify and mitigate project emissions. The Screening Tables allow new development projects a streamlined option for complying with

CEQA requirements for addressing GHG emissions. The screening tables are setup similar to a checklist, with points allocated to certain elements that reduce greenhouse gas emissions. If a project garners 100 points, then the project is considered to be consistent with Riverside County's plan (and the broader state-wide policies) for reducing GHG emissions.

As shown in **Table 20-2**, the proposed Project is expected to generate less than 3,000 $MTCO_2e$ per year and would therefore be in compliance with the CAP and no additional mitigation would be necessary.

The Project will also be required to comply with the mandatory requirements of Title 24 part 11 of the California Building Standards Code (CALGreen) and Title 24 Part 6 Building Efficiency Standards to further reduce energy usage and GHG emissions. CALGreen and building code compliance are considered part of the project's design features. The Project shall also comply with **Project Design Features AQ/GHG-DF-1** through **AQ/GHG-DF-21**. Compliance with **Project Design Features AQ/GHG-DF-1** through **AQ/GHG-DF-21** are considered standard requirements and included as part of the Project's design features, not unique mitigation under CEQA.

Therefore, the proposed Project will not conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of greenhouse gases and the impact is considered less than significant and no mitigation is required.

The *AQ/GHG Study* recommended **Project Design Features AQ/GHG-DF-1** through **AQ/GHG-DF-17** which include standard rules and requirements, best practices and recognized design features for reducing air quality and GHG emissions. **Project Design Features AQ/GHG-DF-1** through **AQ/GHG-DF-17** are assumed to be part of the conditions of approval for the Project and integrated into the design.

Construction Design Features:

AQ/GHG-DF-1 The Project must follow the standard SCAQMD rules and requirements with regards to fugitive dust control, which includes, but are not limited to the following:

- All active construction areas shall be watered two (2) times daily.
- Speed on unpaved roads shall be reduced to less than 15 mph.
- Any visible dirt deposition on any public roadway shall be swept or washed at the site access points within 30 minutes.
- Any on-site stockpiles of debris, dirt or other dusty material shall be covered or watered twice daily.
- All operations on any unpaved surface shall be suspended if winds exceed 15 mph.
- Access points shall be washed or swept daily.
- Construction sites shall be sandbagged for erosion control.
- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Cover all trucks hauling dirt, sand, soil, or other loose materials, and maintain at least 2 feet of freeboard space in accordance with the requirements of California Vehicle Code (CVC) section 23114.
- Pave or gravel construction access roads at least 100 feet onto the site from the main road and use gravel aprons at truck exits.

- Replace the ground cover of disturbed areas as quickly possible.
- A fugitive dust control plan should be prepared and submitted to SCAQMD prior to the start of construction.

AQ/GHG-DF-2 Prepare and implement a Construction Management Plan which will include Best Available Control Measures to be submitted to the County of Riverside.

AQ/GHG-DF-3 Construction equipment shall be maintained in proper tune.

AQ/GHG-DF-4 All construction vehicles shall be prohibited from excessive idling. Excessive idling is defined as five (5) minutes or longer.

AQ/GHG-DF-5 Minimize the simultaneous operation of multiple construction equipment units.

AQ/GHG-DF-6 The use of heavy construction equipment and earthmoving activity shall be suspended during Air Alerts when the Air Quality Index reaches the "Unhealthy" level.

AQ/GHG-DF-7 Utilize low emission "clean diesel" equipment with new or modified engines that include diesel oxidation catalysts, diesel particulate filters or Moyer Program retrofits that meet California Air Resources Board best available control technology.

AQ/GHG-DF-8 Establish an electricity supply to the construction site and use electric powered equipment instead of diesel-powered equipment or generators, where feasible.

AQ/GHG-DF-9 Establish staging areas for the construction equipment that are as distant as possible from adjacent sensitive receptors (residential land uses).

AQ/GHG-DF-10 Use haul trucks with on-road engines instead of off-road engines for on-site hauling.

AQ/GHG-DF-11 Utilize zero volatile organic compounds (VOC) and low VOC paints and solvents, wherever possible.

AQ/GHG-DF-12 A lead hazard evaluation should be performed prior to the demolition or occupancy of any structure on the project site built before 1978. If necessary, 1-7 a lead abatement plan and clearance inspection should be provided prior to occupancy.

Operational Design Features:

AQ/GHG-DF-13 Comply with the mandatory requirements of Title 24 Part 11 of the California Building Standards Code (CALGreen) and the Title 24 Part 6 Building Efficiency Standards.

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

AQ/GHG-DF-14 Implement water conservation strategies, including low flow fixtures and toilets, water efficient irrigation systems, drought tolerant/native landscaping, and reduce the amount of turf.

AQ/GHG-DF-15 Comply with the mandatory requirements of CalRecycle's commercial recycling program and implement zero waste strategies.

AQ/GHG-DF-16 Provide the necessary infrastructure to support electric vehicle charging, as required by CALGreen.

AQ/GHG-DF-17 Use electric landscaping equipment, such as lawn mowers and leaf blowers, where feasible.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation 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?	☐	☐	☒	☐
c) Impair implementation of or physically interfere with an adopted emergency response plan or an 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Source(s): *Map My County* (**Appendix A**); *Phase I Environmental Site Assessment,* prepared by Earth Strata, Inc., 12-11-2020 (*Phase I ESA*, **Appendix G**); Project Plans (**Appendix K**); Hemet Unified School District website; GEOTRACKER website; and The Department of Toxic Substances Control EnviroStor website.

Findings of Fact:

a) Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact

The proposed Project could result in a significant hazard to the public if the Project includes the routine transport, use, or disposal of hazardous materials or places housing near a facility which routinely transports, uses, or disposes of hazardous materials.

The Project site is located in an unincorporated rural area of southwest Riverside County identified in the *Map My County* as the community of Diamond Valley, approximately five (5) miles east of Diamond Valley Lake. The Project site is mostly surrounded by large expanses of vacant lands with a combination of Rural Mountainous (RM), Open Space Rural (OS-R), and Open Space - Conservation Habitat (CH) land use designations.

The Project proposes to repurpose existing Paradise Valley Ranch (PVR) property to accommodate the west coast "Center of Excellence" for firefighter mental and behavioral health and research/training for the Wildfire Conservancy.

The proposed Project does not place "for sale" or "for lease/rent" housing near any hazardous materials facilities. However, the Project does propose to repurpose some of the existing buildings for use as a mental and behavior health treatment facility that would accommodate up to 112 beds, in addition to the existing guest cottage and the existing manager's residence slated for extensive remodel as either offices for the Wildfire Conservancy or continued use as a manager's residence.

The previous retreat and conference center use included a residential use in the form of an existing 7-bedroom main house (Silverado House; Facility 1), a freestanding garage (Facility 2), two lodges (Chaparral Lodge & Ponderosa Lodge; Facility 3 & Facility 4), a manager's residence (Hacienda House).

The routine use, transport, or disposal of hazardous materials is most typical of industrial uses that require hazardous materials for manufacturing operations. Phases 1 and 2 of the Project propose to rehab a number of existing facilities and construct a number of new facilities, including a limited private photovoltaic (PV) solar panel array for onsite power. The proposed Project does not propose or facilitate any activity involving significant use, routine transport, or disposal of hazardous substances as part of the proposed use.

During construction, there would be a minor level of transport, use, and disposal of hazardous materials and wastes that are typical of construction projects. This would include fuels and lubricants for construction machinery, coating materials, etc. Routine construction control measures and best management practices for hazardous materials storage, application, waste disposal, accident prevention and clean-up, etc. would be sufficient to reduce potential impacts to a less than significant level.

With regard to Project operation, widely used hazardous materials commonly used at residential health care treatment facilities with administrative functions may include cleaners, pesticides, and food waste. The remnants of these and other products are disposed of as household hazardous waste that are prohibited or discouraged from being disposed of at local landfills.

Regular operation and cleaning of these uses, inclusive of the PV solar energy use, would not result in significant impacts involving use, storage, transport or disposal of hazardous wastes and substances. Use of common household hazardous materials and their disposal does not present a substantial health risk to the community. The Project would not generate significant impacts

associated with the routine transport and use of hazardous materials or wastes, and no mitigation is required.

b) *Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

Less Than Significant Impact

The *Phase I ESA* did not reveal evidence of any recognized environmental conditions (RECs) or concerns in connection with the Project site.

During construction, there is a potential for accidental release of petroleum products from vehicles and equipment that would pose a significant hazard to people and the environment. Impacts may occur during construction; however, with the incorporation of standard conditions, such as the SWPPP and WQMP, any impacts will remain less than significant. These standard conditions are applicable to all development; therefore, they are not considered mitigation for CEQA implementation purposes.

Hazardous materials anticipated during operations are anticipated to be those most commonly associated with residential health care treatment facilities (with administrative functions), which include cleaning products, petroleum products, etc. These types of hazardous materials are not potentially hazardous to large numbers of people, especially at the scale they would be stored and used in conjunction with the Project's proposed use, inclusive of the PV solar energy facility use. In addition, the facility will handle medicines and small amounts of medical waste. Disposal of these materials will comply with existing federal, state, and local (i.e., County Health Department) regulations and not disposed of onsite, which is especially important given the site's continued use of septic systems for wastewater disposal. Bathrooms will have signage that prohibits flushing of medicine for disposal. This is a standard condition of approval and is considered regulatory compliance and not unique mitigation under CEQA. There will be no impacts from this potential source of hazardous materials.

The Project propose to rehab a number of existing facilities and construct a number of new facilities, including a limited private PV solar panel array for onsite power. None of the solar components would have any impacts related to hazardous materials.

Some use of potentially hazardous materials, such as herbicides, may be used for the maintenance of the drainage facilities and ornamental landscaped areas. The use of such materials will be in accordance with state and federal regulations pertaining to their use. Therefore, no phase of the Project would 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. Any impacts would be less than significant, and no mitigation is required.

c) *Would the Project impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?*

Less Than Significant Impact

Given the Project site's location at the easterly terminus of Cactus Valley Road, there is an extremely limited potential to interfere with an emergency response or evacuation plan during construction. Control of access would ensure emergency access to the site and Project area during construction through the submittal and approval of a traffic control plan (TCP). The TCP is designed to lessen and abate any construction circulation impacts. This is a standard condition applicable to all development; therefore, it is not considered mitigation for CEQA implementation purposes

Following construction, emergency access to the Project site and area would remain as it was prior to the proposed Project. Therefore, implementation of the Project would not impair implementation of, or physically interfere, with an adopted emergency response plan or an emergency evacuation plan. Impacts would be less than significant, and no mitigation is required.

d) *Would the Project 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 Project area is served by the Hemet Unified School District (HUSD). The schools that serve the Project area are as follows:

- McSweeny Elementary School (grades K-5) located at 451 W. Chambers Avenue in the City of Hemet approximately 8.2 miles (driving distance) northwest of the site;
- Diamond Valley Middle School (grades 6-8) located at 291 W. Chambers Avenue in the City of Hemet approximately 7.6 miles (driving distance) northwest of the site; and
- West Valley High School (grades 9-12) located at 3401 W. Mustang Way in the City of Hemet approximately 9.1 miles (driving distance) northwest of the site.

There are no existing schools located within one-quarter mile of the Project site. Furthermore, there are no proposed schools located within one-quarter mile of the Project site.

Based on this information, implementation of the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. There would be no impact, and no mitigation is required.

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

No Impact

The California State Waterboards GEOTRACKER site provides information regarding Leaking Underground Storage Tanks, Other Cleanup Sites, Land Disposal Sites, Military Sites, Waste Discharge Requirement (WDR) Sites, Permitted Underground Storage Tank (UST) Facilities, Monitoring Wells, Department of Toxic Substances Control (DTSC) Cleanup Sites and DTSC Hazardous Waste Permit Sites.

According to the GEOTRACKER site, there are no active or open cases involving Leaking Underground Storage Tanks, Other Cleanup Sites, Land Disposal Sites, Military Sites, WDR Sites,

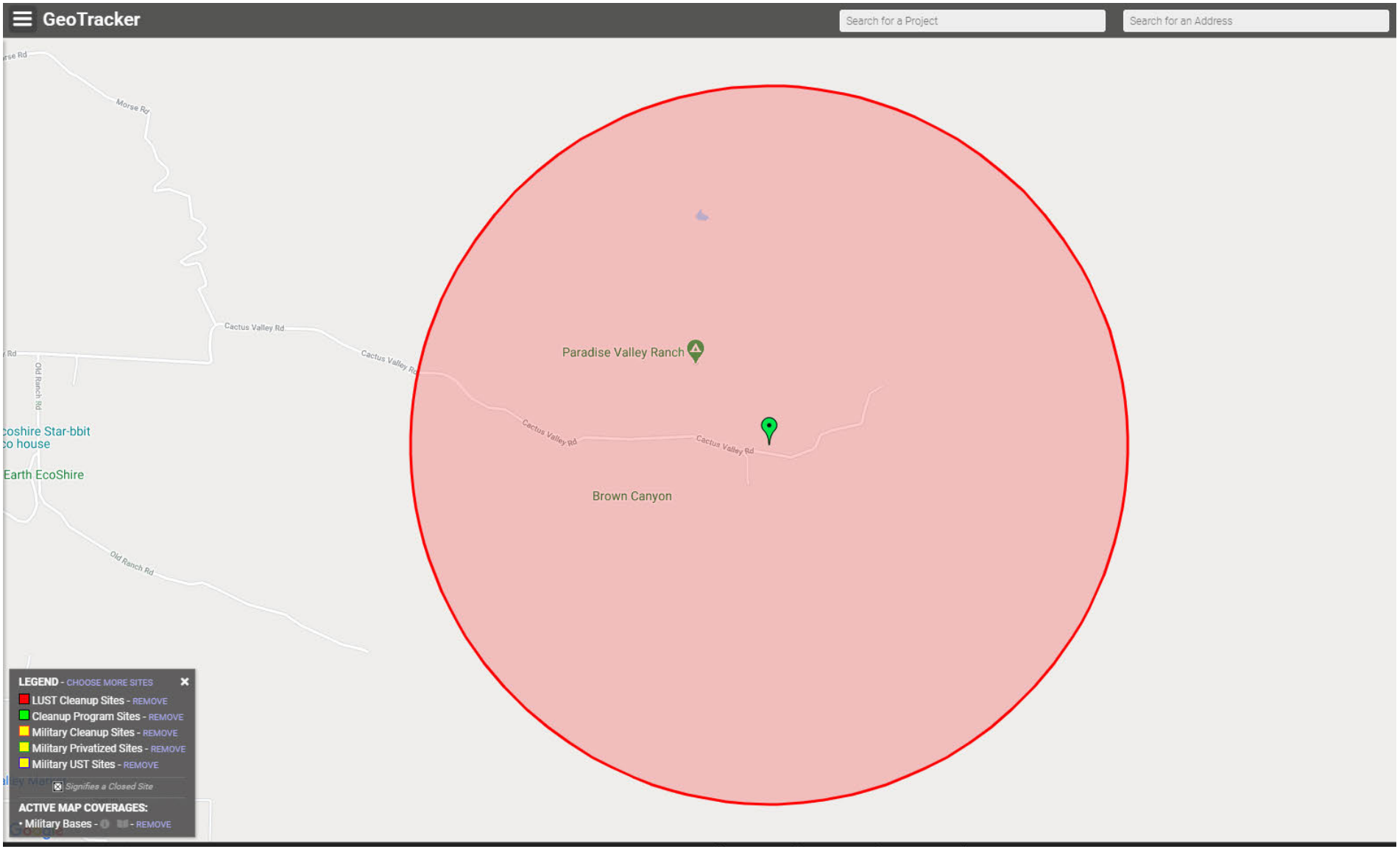
Permitted UST Facilities, Monitoring Wells, DTSC Cleanup Sites and DTSC Hazardous Waste Permit Sites on the proposed Project site, or within two (2) miles of the Project site. Detailed information is shown on **Figure 21-1, *Geotracker Site***.

Likewise, the DTSC's EnviroStor site does not show any active Hazardous Waste and Substances Sites located within a 2-mile radius of the proposed Project site. This information was verified at the web-link cited in the sources, and shown on **Figure 21-2, *EnviroStor Site***.

These conclusions are supported by the information contained in the *Phase I ESA*. The Project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

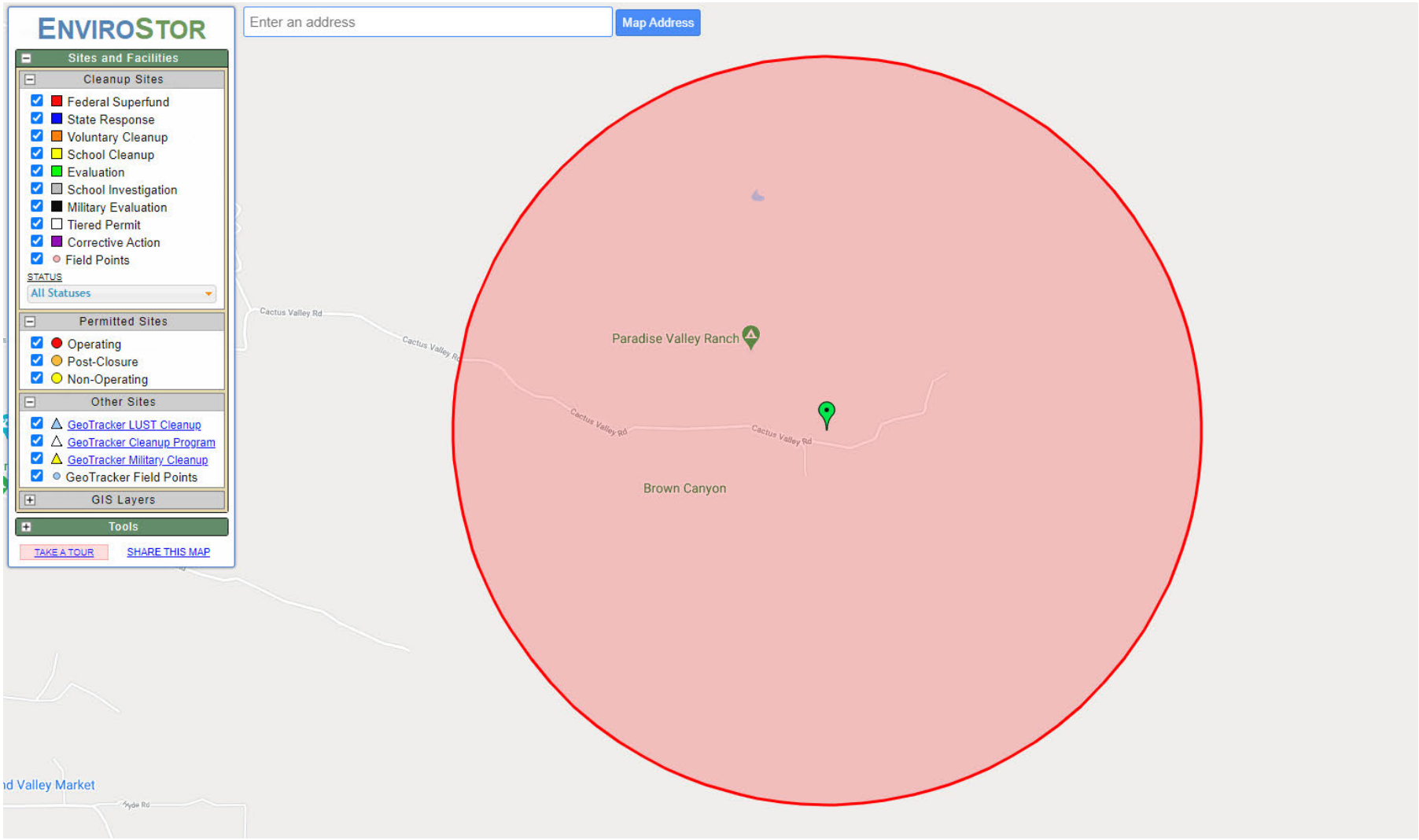
Based upon the available data, there is no evidence to support that hazardous wastes or contamination would be present on the Project site and, therefore, would not create a significant hazard to the public or the environment. There would be no impact, and no mitigation is required.

FIGURE 21-1
GeoTracker Site



Source: GeoTracker https://geotracker.waterboards.ca.gov/

FIGURE 21-2
Envirostor Site



Source: Envirostor https://www.envirostor.dtsc.ca.gov/public/

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

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

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?	☐	☐	☐	☒

Source(s): *Map My County* (**Appendix A**); Riverside County General Plan Figure S-20 "Airport Locations;" *SJVAP* Figure 5, *Hemet-Ryan Airport Influence Area*; AirNav.com website; and Google Earth.

Findings of Fact:

a) *Would the Project result in an inconsistency with an Airport Master Plan?*

No Impact

The Project site is not located in an area which is governed by an airport master plan. The closest airport is the Hemet-Ryan Airport which is located approximately eight (8) miles northwest of the Project site. Therefore, implementation of the proposed Project would not result in a safety hazard for people residing or working in the proposed Project area. There would be no impact, and no mitigation is required.

b) *Would the Project require review by the Airport Land Use Commission?*

No Impact

Please reference the discussion in Threshold 22.a. The Project site is not located in an area which is governed by an airport land use plan; therefore, review by an airport land use commission is not required. The closest airport is the Hemet-Ryan Airport which is located approximately eight (8) miles northwest of the Project site. This criterion is not applicable to the Project. There would be no impact, and no mitigation is required.

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?*

No Impact

The Project site is not located in an area which is governed by an airport master plan. The closest airport is the Hemet-Ryan Airport which is located approximately eight (8) miles northwest of the Project site. Therefore, this criterion is not applicable to the Project. There would be no impact, and no mitigation is required.

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

The closest private airstrip is the Billy Joe Airport - 37CA which is located approximately 14½ miles southwest of the Project site; the closest heliport is at the Hemet Valley Medical Center (Hospital) located approximately 6½ miles northwest of the Project site. These distances are out of the immediate vicinity of the Project Site.

Therefore, implementation of the proposed Project would not result in a safety hazard for people residing or working in the proposed Project area from a private airstrip, or heliport. There would be no impact, and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

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

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Source(s): *Geotechnical Investigation, Paradise Valley Ranch,* prepared by Sladden Engineering, 3-10-2021 (*Preliminary Geotechnical Report*, **Appendix F1**); *Paradise Valley Ranch Percolation Testing for On-Site Sewage Disposal Feasibility,* prepared by Sladden Engineering, 3-10-21 (*Infiltration Report*, **Appendix F2**)*; Center of Excellence and Wildlife Conservancy Project Specific WQMP*, prepared by Valued Engineering, Inc., 1-2022 (*WQMP*, **Appendix H2**); *Paradise Valley Ranch Preliminary Hydrology Study,* prepared by Valued Engineering, 12-2021 (*Drainage Study*, **Appendix H1**); FEMA website; **Figure 5, *Landscape Plan***, provided in Section I of this IS; Ordinance No. 458 (An Ordinance of the County of Riverside Regulating Special Flood Hazard Areas and Implementing the National Flood Insurance Program); Ordinance No. 754 (As Amended through 754.2; An Ordinance of the County of Riverside Amending Ordinance No. 754 Establishing Stormwater/Urban Runoff Management and Discharge Controls); Riverside County General Plan, Safety Element, Figure S-9 *Special Flood Hazard Areas*, and Figure S-10 *Dam Failure Inundation Zone*; Riverside County General Plan, Southwest Area Plan, Figure 12, *Southwest Area Plan Seismic Hazards*; Project Plans (**Appendix K**); and Map My County (**Appendix A**).

Note: Any tables or figures in this section are from the *WQMP and/or Hydrology Report*, unless otherwise noted.

Findings of Fact:

a) Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact

The federal Clean Water Act (CWA) establishes the framework for regulating municipal storm water discharges (construction and operational impacts) via the National Pollutant Discharge Elimination System (NPDES) program. A project would have an impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Water Code Section 13050, or that cause regulatory standards to be violated as defined in the applicable NPDES storm water permit or Water Quality Control Plan for a receiving water body.

For the purpose of this specific issue, a significant impact could occur if the Project would discharge water that does not meet the quality standards of the agencies which regulate surface water quality and water discharge into storm water drainage systems. Significant impacts could also occur if the Project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include preparation of a Water Quality Management Plan (WQMP) to reduce potential post-construction water quality impacts.

According to the *WQMP*, the Project site is located in the Santa Ana River Watershed - San Johns Canyon Sub-Area with a size of approximately 48 gross acres. **Table 23-1, *Downstream Receiving Waters***, shows the receiving water bodies that are downstream of the Project site. The

table also shows their federal CWA Section 303(d) listed impairments in terms of water quality, as well as their designated beneficial uses such as municipal water supply (MUN), groundwater recharge (GWR), contact and non-contact recreation (REC1 and REC2), warm freshwater habitat (WARM), wildlife habitat (WILD), and habitat for listed or sensitive species (RARE). The *WQMP* concludes the Project will require coverage by the Statewide Construction General Permit to adequately protect area water quality.

Table 23-1
Downstream Receiving Waters

Receiving Waters	EPA Approved 303(d) List Impairments	Designated Beneficial Uses
Canyon Lake (Railroad Canyon Reservoir)	Nutrients	MUN, AGR, GWR, REC1, REC2, COMM, WARM, WILD
Lake Elsinore	DDT, Nutrients, Organic Enrichment/Low Dissolved Oxygen, PCB, Toxicity	GWR, REC1, REC2, COMM, WARM, WILD, RARE

All new development in the County is required to comply with provisions of the NPDES program, including Waste Discharge Requirements (WDR) and MS4 Order No. R8-2010-0033, NPDES Permit No. CAS618033, as enforced by the Santa Ana Regional Water Quality Control Board.

The Project proposes the construction and operation of two new buildings (Proposed Facility 6 and Proposed Facility 7 as shown on the Site Plan). The Project will provide 179 parking spaces in Phases IA, IB, and II, and 5 accessible spaces. The Project will also include street improvements, utility infrastructure, impervious surfaces and landscaping for drainage and water quality purposes. The construction and grading activity necessary for implementation of the Project is limited to approximately 7.5 acres of the Project site. The area that would be disturbed consists of roofs, pervious concrete (parking areas), ornamental landscaping, and decomposed granite (for drive aisles). development is proposing two ±9,000 SF buildings and required parking lot. The Project will include pervious concrete for the parking lot, but the majority of the site will be left unaltered to preserve natural infiltration. Only areas under the proposed building will be compacted for structural integrity. Graded slopes around the proposed buildings will be compacted to prevent erosion and sediment transport downstream. In addition, roof drains will discharge to natural pervious areas then be captured in an infiltration basin.

According to the Site Plan, the Project site's existing topography is very hilly, with elevations ranging from 1,972 feet above mean sea level (AMSL) to 2,326 feet AMSL. The development area to be disturbed is divided into two drainage sub-areas as depicted on **Figure 23-1, *Proposed Condition Hydrology Map***. The proposed Project development will utilize low impact development standards intended to preserve the natural topography of the Project site to the maximum extent possible and a combination of the landscaped areas and infiltration trenches are included in the Project design.

The Project proposes to remodel five existing buildings with future development of two new structures into the west coast "Center for Excellence". The site plan refers to these new structures as Facility 6 in the northeast portion of the development area and Facility 7 in the southwest portion of the development area. Other improvements include pervious parking areas, landscaping, curbs, and Class II base roadway for fire access. The development will preserve the existing onsite drainage pattern by ultimately draining stormwater runoff from the eastern portion of the site to the western portion of the site as part of Facility 7 improvements, while Facility 6 drains to the south.

Offsite stormwater runoff which flows onto the property will blow along an existing berm and roadway just east of the proposed development area. The onsite flows associated with Facility 7 will flow into the detention basin on the west part of the site for Facility 7. A large amount of offsite runoff in the Facility 6 area could impact the Project improvements, In order to protect onsite facilities from inundation, offsite flows will be initially captured in a swale north of the proposed access road, then conveyed through a 48-inch pipe culvert under the roadway to the south and discharge to the existing natural drainage course. **Table 23-2, *Hydrology Conditions***, shows the pre- and post-development conditions for the site as well as the storage of the proposed detention basins per the *Hydrology Study*.

Table 23-2
Hydrology Conditions

Drainage Area	Q_{100} Conditions		Proposed Basin Storage
	Pre-Development	Post-Development	
Facility 6	86.34 cfs	87.16 cfs	20,027 cf
Facility 7	10.39 cfs	13.76 cfs	2,712 cf

cfs = cubic feet per second cf = cubic feet

As set forth in the *Hydrology Study*, the existing detention basin designed to accommodate the 10-year return frequency, 24-hour duration event peak flow from the Project site consistent with the RCFCWCD methodology based on the calculated difference in runoff hydrograph volume between the undeveloped and developed conditions (015-Flood Increased Runoff Criteria).

Since the Project involves more than one acre of ground disturbance, it is subject to NPDES permit requirements for the preparation and implementation of a project-specific Storm Water Pollution Prevention Plan (SWPPP). Adherence to NPDES permit requirements and the measures established in the SWPPP are routine actions conditioned by the County and will ensure applicable water quality standards are appropriately maintained during construction of the proposed Project.

The proposed Project has been reviewed and conditioned by the Riverside County Flood Control and Water Conservation District (RCFC&WCD), the County Building Department, and the County Transportation Department to mitigate any potential impacts as listed above through site design and the preparation of a WQMP and adherence to the requirements of the NPDES. These are standard conditions for the County of Riverside and are not considered mitigation for CEQA implementation purposes.

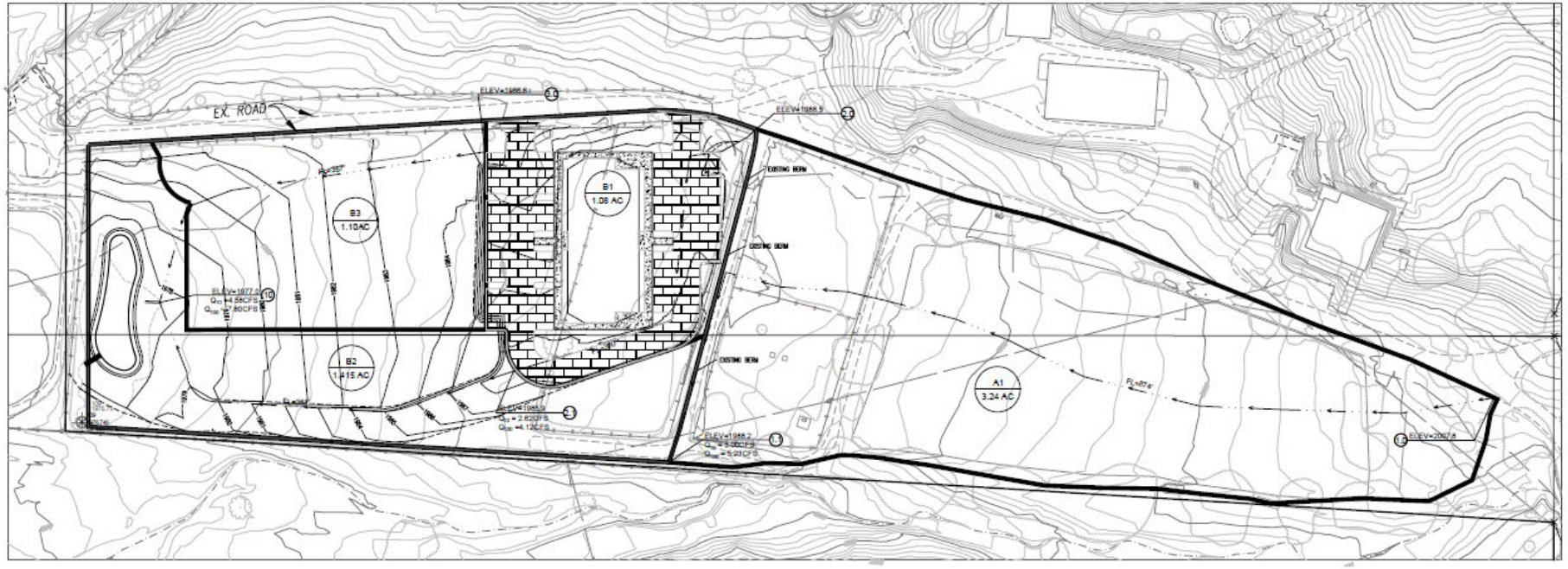
The Project proposes an on-site self-contained septic system that would be reviewed and approved by the County Department of Environmental Health that will allow the Project to operate below regional water quality thresholds. The proposed facility will handle medicines and small amounts of medical waste. Disposal of these materials will comply with existing federal, state, and local (i.e., County Health Department) regulations and not disposed of onsite, which is especially important given the site's continued use of septic systems for wastewater disposal. Bathrooms will have signage that prohibits flushing of medicine for disposal. This is a standard condition of approval and is considered regulatory compliance and not unique mitigation under CEQA. There will be no impacts from this potential source of surface or groundwater contamination.

For the reasons outlined above, implementation of the proposed Project will not require, or result in, the construction of new wastewater treatment facilities or expansion of existing facilities, the

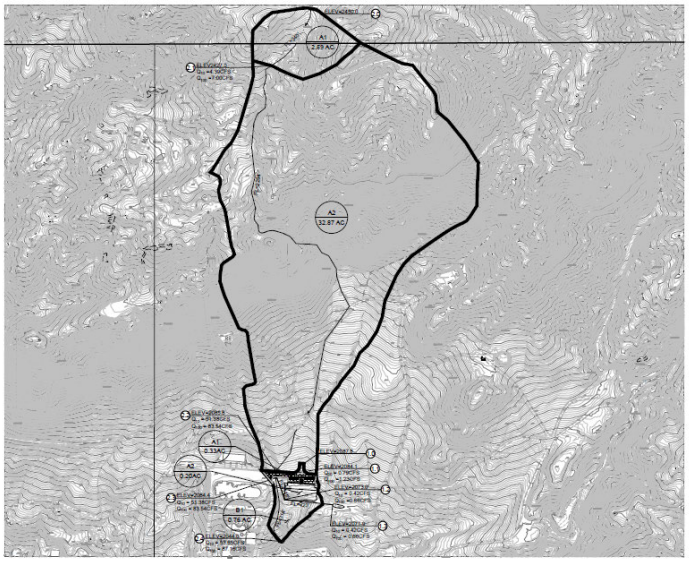
construction of which would cause significant environmental effects. Therefore, the proposed Project will not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Any impacts will be less than significant, and no mitigation is required.

FIGURE 23-1
Proposed Drainage Map

LOCATION A



LOCATION B



Source: Hydrology Report (**Appendix H1**)

b) Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

Less Than Significant Impact

The Project site is not located within the water service district boundary of any service provider. The Project is currently provided water by its own existing onsite well system which has been approved by the Riverside County Environmental Health Department. To serve additional he onsite uses or facilities, the onsite well system will have to be expanded and/or augmented which will require subsequent review and permit approval by the County Department of Environmental Health.

Except in the areas being graded in conjunction with the proposed Project development, the site will remain in its existing condition. Driveways and access roadways will be constructed to the minimum widths required and on-site parking is being designed to minimum requirements to minimize impervious areas. Paved walkways are being limited to those areas in the vicinity of the proposed buildings. Where feasible, the runoff from the building roof areas will be directed to landscaped areas prior to entering the on-site storm drain system.

Impervious areas have been designed to drain to localized landscaping and natural areas that have been designed as infiltration areas. Landscaping is designed per landscaped architectural plans consistent with County standards.

The Project *WQMP* details two (2) drainage management areas (DMAs) in conjunction with the proposed Project development. A summary of the DMAs is included below and **Figure 23-2, *WQMP Site Plan***, identifies the proposed on-site drainage system for the Project site.

- DMA-1 consists of 139,208 square feet and is located at the southwest area of the Project site and encompasses Facility 7, as shown on the Site Plan.

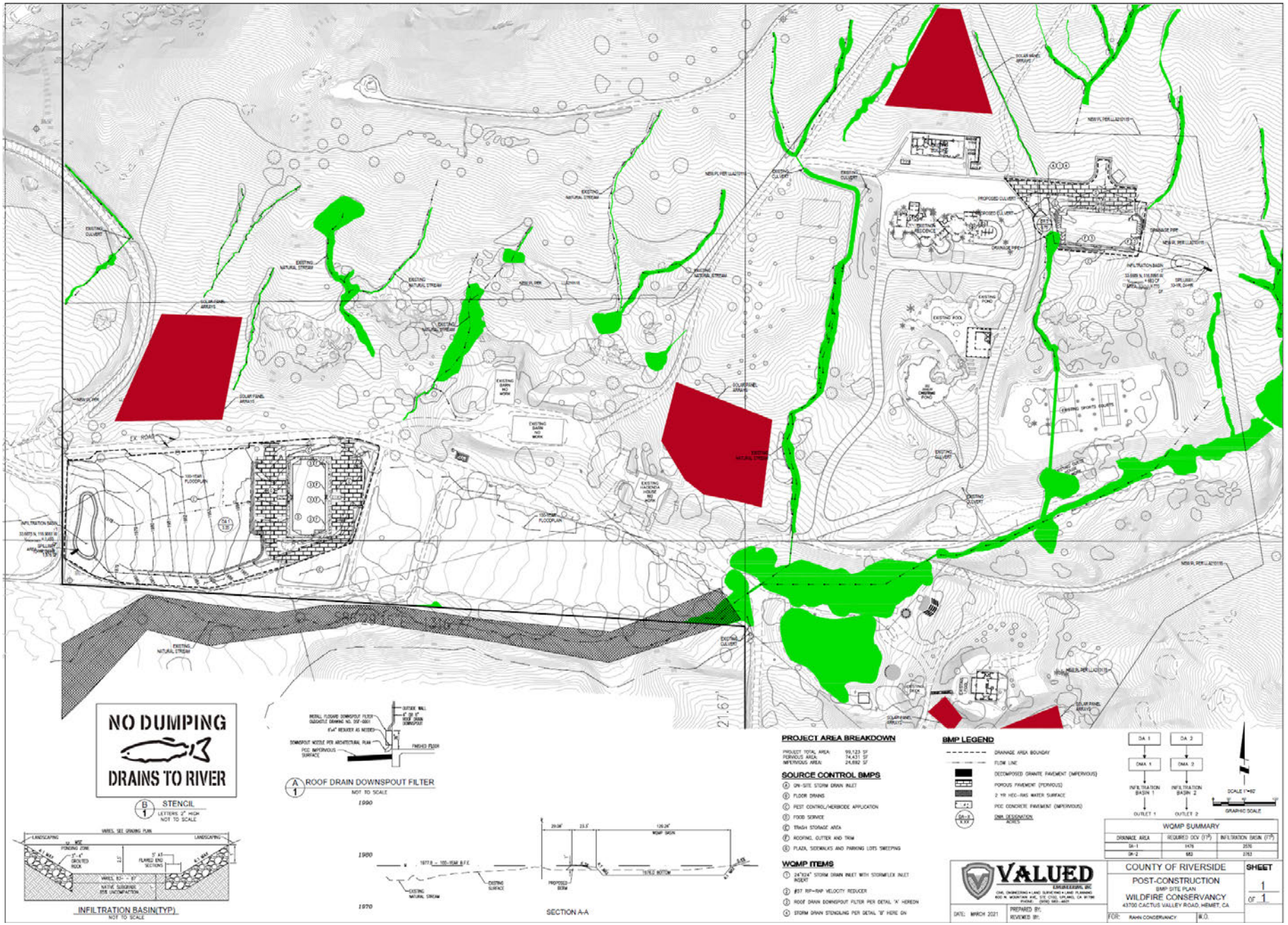
- The DMA-2 consists of 32,735 square feet and is located in the central portion of the Project site and encompasses Facility 6 as shown on the Site Plan.

Both DMAs will drain to the proposed Infiltration Basin shown on the Project Site Plan. The proposed Project development will utilize low impact development standards intended to preserve the natural topography of the Project site to the maximum extent possible.

No component of the proposed Project will deplete groundwater supplies. The Project design, as depicted on the Project plans and Project-specific *WQMP*, will allow for water to percolate back into the ground and allow for groundwater recharge. This will help to offset any potential effects on groundwater recharge from other non-pervious elements of the proposed Project.

Therefore, implementation of the proposed Project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted). Impacts are considered less than significant, and no mitigation is required.

FIGURE 23-2
WQMP Site Plan



Source: WQMP (**Appendix H2**)

c) *Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?*

Less Than Significant Impact

Please refer to the hydrology discussion set forth under Threshold 23.a. The proposed Project development will utilize low impact development standards intended to preserve the natural topography of the Project site to the maximum extent possible and a combination of the landscaped areas and infiltration trenches are included in the Project design. The proposed Project drainage and water quality systems meet the requirements and criteria established by the Riverside County Flood Control and Water Conservation District (RCVCWCD) and will include flood control protection by providing the necessary Best Management Practices to treat the runoff generated by the Project in a manner that meet the requirements outlined in the Water Quality Management Plan Guidance Document.

As outlined in Threshold 23.a, the Project proposes to remodel five existing buildings with future development of two new structures into the west coast "Center for Excellence". The site plan refers to these new structures as Facility 6 in the northeast portion of the development area and Facility 7 in the southwest portion of the development area. Other improvements include pervious parking areas, landscaping, curbs, and Class II base roadway for fire access. The development will preserve the existing onsite drainage pattern by ultimately draining stormwater runoff from the eastern portion of the site to the western portion of the site as part of Facility 7 improvements, while Facility 6 drains to the south.

Offsite stormwater runoff which flows onto the property will blow along an existing berm and roadway just east of the proposed development area. The onsite flows associated with Facility 7 will flow into the detention basin on the west part of the site for Facility 7. A large amount of offsite runoff in the Facility 6 area could impact the Project improvements, In order to protect onsite facilities from inundation, offsite flows will be initially captured in a swale north of the proposed access road, then conveyed through a 48-inch pipe culvert under the roadway to the south and discharge to the existing natural drainage course. The previous **Table 23-1, *Hydrology Conditions***, shows the pre- and post-development conditions for the site as well as the storage of the proposed detention basins per the Hydrology Study. As set forth in the Hydrology Study, the existing detention basin has adequate capacity to convey the expected 10-year return frequency, 24-hour duration event peak flow from the Project site consistent with the RCFCWCD methodology based on the calculated difference in runoff hydrograph volume between the undeveloped and developed conditions (015-Flood Increased Runoff Criteria). Therefore, the post-Project drainage pattern will remain essentially the same as in the pre-Project condition.

The proposed Project has been reviewed and conditioned by the RCFC&WCD, the County Building Department, and the County Transportation Department, to mitigate any potential impacts as listed above through site design and the preparation of a WQMP and adherence to the requirements of the NPDES. These are standard conditions for the County of Riverside and are not considered mitigation for CEQA implementation purposes**.**

The Project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces. Any impacts will be less than significant, and no mitigation is required.

d) Would the Project result in substantial erosion or siltation on-site or off-site?

Less Than Significant Impact

Refer also to Thresholds 18.a and 19.a, pertaining to the potential for erosion to occur with Project implementation.

Existing and proposed drainage conditions are summarized under Threshold 23.c. Furthermore, as stated in Threshold 23.c, the post-Project drainage pattern will remain essentially the same as in the pre-Project condition. Implementation of the Project as proposed, would not result in substantial erosion on-site or off-site. Runoff will be directed to onsite landscaping features and other pervious areas and eventually reach an onsite infiltration basin, as shown on the Project Site Plan.

Since the Project involves more than one acre of ground disturbance, it is subject to NPDES permit requirements for the preparation and implementation of a Project-specific SWPPP. Adherence to NPDES permit requirements and the measures established in the SWPPP are routine actions conditioned by the County and will ensure applicable water quality standards are appropriately maintained during construction of the proposed Project.

The proposed Project has been reviewed and conditioned by the RCFC&WCD, the County Building Department, and the County Transportation Department, to mitigate any potential impacts as listed above through site design and the preparation of a WQMP and adherence to the requirements of the NPDES. These are standards conditions for the County of Riverside and are not considered mitigation for CEQA implementation purposes.

Therefore, no phase of the Project will result in substantial erosion or siltation on-site or off-site. Any impacts will be less than significant, and no mitigation is required.

e) Would the Project substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?

Less Than Significant Impact

A detailed description of the post-Project storm drain system design is included in Thresholds 23.a and 23.b. The Project has been designed such that no substantial increase in surface runoff would occur with Project implementation. According to the Project *Drainage Study*, the existing site does not retain any stormwater in the existing condition. In the developed condition, the runoff will be detained in a basin designed to accommodate the 10-year return frequency, 24-hour duration event peak flow from the Project site consistent with the RCFCWCD methodology based on the calculated difference in runoff hydrograph volume between the undeveloped and developed conditions (015-Flood Increased Runoff Criteria).

The proposed conditions presented by the Project's site layout incorporate low impact development standards, green elements, hydromodification elements, permeable options, among others. The overall drainage patterns are preserved in the proposed condition by matching existing condition discharge points, dispersing impervious area flows to permeable areas, and includes infiltration areas to mitigate increases in peak storm runoff quantities.

These elements mitigate the proposed increases in the imperviousness over the existing conditions while allowing for the installation of all the proposed impervious elements. Using this type of treatment control plan, the Project design has minimized the proposed impervious area footprint as much as feasible without sacrificing design and use elements.

Therefore, the Project will not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site. Any impacts from implementation of the Project will be less than significant, and no mitigation is required.

f) Would the Project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact

A detailed description of the post-Project drainage condition is included in Thresholds 23.a and 23.b. **Figure 23-2, *WQMP Site Plan***, provided in Threshold 23.b, identifies the proposed on-site drainage basin for the Project site.

The Project *WQMP* details two (2) DMAs in conjunction with the proposed Project development. The DMA-1 is approximately 139,208 square feet and includes Facility 7 as shown on the Site Plan. DMA-2 is 32,735 square feet and includes Facility 6 as shown on the Site Plan.

According to the Project *Drainage Study*, the existing site does not retain any stormwater in the existing condition. In the developed condition, the runoff will be detained in a basin designed to accommodate the 10-year return frequency, 24-hour duration event peak flow from the Project site consistent with the RCFCWCD methodology based on the calculated difference in runoff hydrograph volume between the undeveloped and developed conditions (015-Flood Increased Runoff Criteria). Therefore, the post-Project drainage pattern will remain essentially the same as in the pre-Project condition, and Project implementation would not result in an increase in the volume or rate of runoff from the Project site in its undeveloped condition.

The proposed Project has been reviewed and conditioned by the RCFC&WCD, County Building Department, and County Transportation Department, to mitigate any potential impacts as listed above through site design and the preparation of a WQMP and adherence to the requirements of the NPDES. The incorporation of BMP's during construction and operation would ensure that the Project does not result in substantial additional sources of polluted runoff.

These are standard conditions for the County of Riverside and are not considered mitigation for CEQA implementation purposes. With the inclusion of these standard conditions, any impacts from implementation of the proposed Project that would create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, would be less than significant, and no mitigation is required.

g) Would the Project impede or redirect flood flows?

Less Than Significant Impact

Based on a review of the FEMA Flood Rate Insurance Map (FIRM), Panel No. 06065C2120G, with the exception of a relatively small sliver of land along the Project site's southerly boundary, the

Project site is not located within a FEMA designated flood hazard area. Refer to **Figure 23-3, *FEMA Firmette Map*** and Project Plans. The post-Project on- and off-site drainage plan has been designed such that the Project would not impede or redirect flows and will eliminate the existing flood zone in the southwest portion of the site per the Project *Hydrology Study* and *Grading Plan*. Therefore, impacts will be less than significant, and no mitigation is required.

h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to Project inundation?

Less Than Significant Impact

As outlined in Threshold 23.g, the Project site is not located within a FEMA designated flood hazard area except for a relatively small sliver of land along the Project site's southerly boundary. The FEMA Flood Rate Insurance Map (FIRM), Panel No. 06065C2120G indicates the northern and eastern portions of the Project site and surrounding properties to the north, northwest, east, and southeast are located in Zone X, which corresponds to areas outside the 100-year floodplain. The southwest portion of the Project site (i.e., the administration/trailer area), along with contiguous lands south of the Project site, is depicted as being located in Zone A (Special Flood Hazard Areas). Refer to **Figure 23-3, *FEMA Firmette Map*** and Project Plans. The Project grading plan shows that the entire administration/trailer area will be elevated one foot above the floodplain base flood elevation to comply with FEMA flood zone requirements.

This information is consistent with Figure 10 (Special Flood Hazard Areas) of Riverside County's San Jacinto Valley Area Plan which shows that a portion of the Project site's southeasterly boundary is impacted but that the remaining majority of the Project site is not within the Special Flood Hazard Area or Dam Inundation Area. The Project site is located approximately 4 1/4 miles southeast of the Diamond Valley Lake spillway.

It is noted that Map My County states that the Project site is outside of the flood plain but that a "flood plain review may be required."

The Project site is located approximately 31 miles northeast of the nearest coastline (Pacific Ocean); therefore, the risk associated with tsunamis is negligible.

The Project site not located adjacent to a body of water; a seiche is a run-up of water within a lake or embayment triggered by fault or landslide induced ground displacement. The Project site is located approximately 5 miles east of Vail Lake, and 9 miles northeast of Lake Skinner. Therefore, the risk associated with a seiche is negligible.

In summary, the Project site development area is not located within a flood hazard, tsunami, or seiche zone. Any impacts would be less than significant, and no mitigation is required.

FIGURE 23-3
FEMA Firmette Map

Source: FEMA https://msc.fema.gov/portal/search?AddressQuery=hemet%2C%20ca#searchresultsanchor

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

i) Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact

The Project *WQMP* has been prepared specifically to comply with the requirements of Riverside County for County Ordinance No. 754 (Riverside County Water Quality Ordinance) which includes the requirement for the preparation and implementation of a Project-Specific WQMP.

As discussed in Threshold 23.a, the Project site is located in the Santa Ana Region Watershed - San Johns Canyon Sub-Area with a size of approximately 48 gross acres. With adherence to, and implementation of the conclusions and recommendations set forth in the Project *WQMP,* Project site development will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Any impacts would be less than significant, and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

LAND USE/PLANNING Would the Project:				
24. Land Use				
a) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
b) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?	☐	☐	☒	☐

Source(s): *Map My County* (**Appendix A**); Riverside County General Plan - SJVAP; **Figure 4, *Site Plan***, provided in Section I of this Initial Study; and Project Plans (**Appendix K**).

Findings of Fact:

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

Less Than Significant Impact

The Project site is located in the San Jacinto Valley Area Plan (SJVAP), one of nineteen (19) planning areas within the County of Riverside's General Plan. As set forth in *Map My County*, the SJVAP, and **Figure 4, *Site Plan***, the Project site's underlying General Plan land use designation is Rural Residential (R-R) in the southern portion and Rural Mountainous (R-M)in the northern portion. The Project site is currently zoned Rural Residential (R-R). The current General Plan Land Use Designations are Rural Residential and Rural Mountainous (R-M). Surrounding zoning and land uses to the north and west are Rural Residential and Rural Mountainous, respectively. Surrounding zoning and land use to the east are Rural Residential and Open Space Rural, respectively.

Surrounding zoning and land use to the south are Rural Residential and Conservation Habitat, respectively. The zoning and land use designations of the site and surrounding area are delineated in **Table 24-1, *Land Use and Zoning Designations***. The site plan of the proposed facilities is consistent with the existing onsite zoning and General Plan land use designations. The proposed uses are also consistent and compatible with surrounding zoning and land use designations.

Table 24-1
Land Use and Zoning Designations

Location/ Direction	General Plan Land Use Designation	County Zoning
Project Site	Rural Residential (R-R)	Rural Residential (R-R)
North	Rural Mountainous (R-M) Rural Residential (R-R)	Rural Residential (R-R)
South	Conservation Habitat	Rural Residential (R-R)
East	Rural Residential (R-R)	Rural Residential (R-R)
West	Rural Mountainous (R-M) Rural Residential (R-R)	Rural Residential (R-R)

Source: Map My County https://gis1.countyofriverside.us/Html5Viewer/index.html?viewer=MMC_Public

For the treatment facility (i.e., Center for Excellence), either the Residential Facility or Residential Care Facility would be the closest permitted uses allowed in the current R-R zone. The use being permitted would either be classified as a Residential Facility or Residential Care Facility as defined by the zoning. The R-R zoning would also allow the wildfire research facility (i.e., Wildfire Conservancy) to be permitted since it would be similar in character and intensity to other uses permitted in the zone.

Therefore, the proposed treatment and research facilities are consistent with the existing zoning and General Plan land use designations for the site. In addition, they are of low intensity and would be compatible with surrounding zoning and General Plan land use designations (e.g., Rural Mountainous, Open Space Rural, and Conservation Habitat). Therefore, the Project's proposed development plan is consistent with the existing zoning of the Project site and is compatible with the surrounding area's zoning. The Project site is also not located within a specific plan area.

The Project, as designed, meets the R-R standards of development in terms of heights, setbacks, lot coverage, parking and landscaping. Therefore, no change to the zoning is proposed for the Project.

Based on the above information, the Project will not 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. Impacts will be less than significant, and no mitigation is required.

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

No Impact

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

The Project is consistent with the existing General Plan land use designations, zoning and developed uses. There are no identified low-income or minority communities on or in the vicinity of the Project site, therefore, this issue is not applicable.

The area surrounding the Project site is largely vacant land at present with scattered rural and agricultural uses to the west and southwest. The site is at the east end of a long rural road so activities on this site would not divide or disrupt any existing neighborhoods.

Based on this information, the proposed Project would not disrupt or divide the physical arrangement of an established community (including a low-income or minority community). There will be no impact and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation 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?	☐	☐	☐	☒
c) Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?	☐	☐	☐	☒

Source(s): *Map My County* (**Appendix A**); Riverside County General Plan, *Multipurpose Open Space Element*, Figure OS-6, *Mineral Resource Zones*; San Jacinto Valley Area Plan (SJVAP); mindat.org website; United States Geological Service (USGS) website; California State Mining and Geology Board (CSMGB) website; California Geological Survey (CGS) website; and Site visit by Matthew Fagan March 2021.

Findings of Fact:

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?

No Impact

The California State Mining and Geology Board (SMGB) has established Mineral Resources Zones (MRZ) using the following classifications:

- MRZ-1: Areas where the available geologic information indicates no significant mineral deposits or a minimal likelihood of significant mineral deposits.
- MRZ-2a: Areas where the available geologic information indicates that there are significant mineral deposits.
- MRZ-2b: Areas where the available geologic information indicates that there is a likelihood of significant mineral deposits.

- MRZ-3a: Areas where the available geologic information indicates that mineral deposits are likely to exist; however, the significance of the deposit is undetermined.
- MRZ-4: Areas where there is not enough information available to determine the presence or absence of mineral deposits.

As shown on *General Plan Multipurpose Open Space Element*, Figure OS-6, "Mineral Resource Zones," the Project site is within a large portion of the County that has not been studied or designated relative to mineral resource zones ("unstudied"). In addition, the Project site and surrounding areas have not been and are not being used for mining. Therefore, the Project is not expected to result in the loss of availability of a known mineral resource in an area classified or designated by the State that would be of value to the region or the residents of the State. No impacts will occur, and no mitigation is required.

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

As stated in Threshold 25.a, the Project site and surrounding areas have not been studied or designated as mineral resource zones ("unstudied") and the area is not designated for mineral resource extraction in the County's General Plan or the San Jacinto Valley Area Plan (SJVAP). In addition, the Project site and surrounding areas have not been used for mining in the past or at present. Therefore, implementation of the proposed Project will not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. No impacts will occur, and no mitigation is required.

c) Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?

No Impact

Based on a site visit, it was observed that the Project is not located on, or adjacent to, an existing or abandoned quarry or mine. According to the USGS, CSMGB, and CGS websites, the following five mines or mining claims are registered in the region surrounding the Project site[3]:

- Nichols Magnesite Deposit, Valle Vista (Latitude 33.7083N, Longitude 116.9175W) located approximately 3.8 miles northwest of the Project Site;
- Lucky Strike Mine, Meadowbrook (Latitude 33.7189N, Longitude 116.9265W) located approximately 4.5 miles northwest of the Project site;
- Hemet Magnesite Mine, Hemet (Latitude 33.6961N, Longitude 116.9747W) located approximately 7.0 miles west-northwest of the Project site:
- Hemet Silica Mine, Hemet (Latitude 33.7086N, Longitude 116.9616W) located approximately 6.9 miles west-northwest of the Project site: and
- Anita Gemstone Mine, Valle Vista (Latitude 33.6400N, Longitude 116.8705W) located 3.5 miles southeast of the Project site.

[3] Approximate location of the Project site is Latitude 33.4008N, Longitude 116.5406W

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

Therefore, implementation of the proposed Project will not expose people or property to hazards from proposed, existing or abandoned quarries or mines. No impacts will occur, and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

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

Source(s): *Map My County* (**Appendix A**); Riverside County General Plan Figure S-20 "Airport Locations," County of Riverside Airport Facilities Map*;* **Figure 3, *Aerial Photo***, provided in Section I of this IS; and Google Maps.

Note: Any tables or figures in this section are from the *Noise Analysis*, unless otherwise noted.

Findings of Fact:

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?

No Impact

The Project site is not located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport. The closest airport is the Hemet-Ryan Airport which is located 8.1 miles northwest of the Project site (reference **Figure 3, *Aerial Photo***, provided in Section I of this IS). Therefore, implementation of the proposed Project would not expose people residing or working in the Project area to excessive noise levels. There will be no impacts and no mitigation is required.

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

Based on a review of an aerial photo of the Project site and its immediate environs (reference **Figure 3, *Aerial Photo***, provided in Section I of this IS), the proposed Project is not located within the vicinity of a private airstrip or heliport. The closest private airstrip is the Temecula Valley Airpark which is located approximately 15.6 miles southwest of the Project site and the closest

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

heliport is at the Hemet Valley Hospital located approximately 6.3 miles northwest of the Project site. Therefore, implementation of the proposed Project would not expose people residing or working in the Project area to excessive noise levels. No impacts will occur, and no mitigation is required.

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

Source(s): Riverside County General Plan, Table N-1 ("Land Use Compatibility for Community Noise Exposure"), Project Plans (**Appendix K**); and *Paradise Valley Ranch Noise Impact Study County of Riverside,* prepared by RK Engineering Group, Inc., 7-23-2021 (*Noise Analysis,* **Appendix I**).

Findings of Fact:

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 Impact

Noise Characteristics

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air. Noise is generally defined as unwanted sound. Sound is characterized by various parameters which describe the rate of oscillation of sound waves, the distance between successive troughs or crests, the speed of propagation, and the pressure level or energy content of a given sound wave. In particular, the sound pressure level has become the most common descriptor used to characterize the loudness of an ambient sound level. The unit of sound pressure ratio to the faintest sound detectable by a keen human ear is called a decibel (dB).

Because sound or noise can vary in intensity by over one million times within the range of human hearing, decibels are on a logarithmic loudness scale similar to the Richter Scale used for earthquake magnitude. Since the human ear is not as equally sensitive to all sound frequencies within the entire spectrum, noise levels at maximum human sensitivity are factored more heavily into sound descriptions in a process called "A-weighting" written as "dBA." Any further reference to decibels written as "dB" should be understood to be A-weighted values.

Time variations in noise exposure are typically expressed in terms of a steady-state energy level equal to the energy content of the time varying period (called Leq), or, alternately, as a statistical description of the sound pressure level that is exceeded over some fraction of a given observation period. Finally, because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, State law requires that, for planning purposes, an artificial dB increment be added to quiet time noise levels in a 24-hour noise descriptor called the Community Noise Equivalent Level (CNEL). In some jurisdictions, the day-night level (called "Ldn") is used for noise exposure planning. Ldn is almost equivalent to CNEL.

CNEL or Ldn-based standards apply to noise sources whose noise generation is preempted from local control (such as from on-road vehicles, trains, airplanes, etc.). Since local jurisdictions cannot regulate the noise generator, they exercise land use planning authority on the receiving property. Uses that are amenable to local control are generally considered "stationary sources." Local jurisdictions generally regulate the level of noise that one use may impose upon another.

One noise source associated with land use intensification governed by local regulation is noise from construction activities. Construction noise is exempted from requirements during the hours from 7:00 a.m. to 6:00 p.m. on weekdays. Construction noise impacts are only considered to be significant if they occur outside these allowed hours on weekdays or at any time on Sundays and holidays.

Project Noise Setting

The Project site is located within the San Jacinto Valley Area Plan (SJVAP) of the Riverside County General Plan east of the City of Hemet approximately 4 miles east of State Street at the end of Cactus Valley Road. Existing land uses surrounding the proposed project site include Rural Residential and Rural Mountainous use to the north and west, Rural Residential and Open Space Rural to the east and Rural Residential and Conservation Habitat to the south. The nearest noise-sensitive land use is considered to be the residential property located at least 1,000 feet from the western property line of the Project site. Noise sources in the Project area include traffic on Cactus Valley Road although overall noise levels in the surrounding area are relatively low given the rural nature of the area.

Riverside County Noise Standards

For noise sources generated on private property (such as the proposed Project), the appropriate noise standards, as contained in the Riverside County Noise Element indicates the normally acceptable noise level (i.e., Community Noise Equivalent Level or CNEL) for residential properties is less than 60 dBA. Similarly, the County's Stationary Source Noise Standards for residential uses are 65 dB Lmax from 7:00 a.m. to 10:00 pm, and to 45 dB Lmax from 10:00 p.m. to 7 a.m. However, it should be noted these are only preferred standards and the final decisions is made by the Riverside County Planning Department and Office of Public Health based on the County's General Plan Policy N-2.3 Stationary Source Land Use Noise Standards. In addition, County Ordinance No. 847 establishes a maximum noise standard of 45 dBA (Lmax) at any time for rural land uses such as those surrounding the Project site (i.e., in Rural Residential and Rural Mountainous zones).

Construction Noise Impacts

Temporary construction noise impacts vary markedly because the noise strength of construction equipment ranges widely as a function of the equipment used and its activity level. Short-term construction noise impacts tend to occur in discrete phases dominated initially by earth-moving sources, then by foundation and roadway paving, and finally for finish construction.

The earth-moving sources are seen to be the noisiest with equipment noise ranging up to about 90 dB (A) at 50 feet from the source. Spherically radiating point sources of noise emissions are atmospherically attenuated by a factor of 6 dB per doubling of distance, or about 20 dB in 500 feet of propagation. The loudest earth-moving noise sources will therefore sometimes be detectable above the local background beyond 1,000 feet from the construction area. An impact radius of 1,000 feet or more pre-supposes a clear line-of-sight and no other machinery or equipment noise that would mask project construction noise. With buildings and other topographical barriers to interrupt line-of-sight conditions, the potential "noise envelope" around individual construction sites is reduced. Construction noise impacts are, therefore, somewhat less than that predicted under idealized input conditions.

The *Noise Analysis* evaluated potential noise impacts during all expected phases of construction, including demolition, site preparation, grading, building construction, paving, and architectural coating. Noise levels are calculated based on an average distance of equipment over an 8-hour period to the nearest adjacent property. **Table 27-1, *Project Construction Noise Levels – Residential Uses to the West*** shows the noise level impacts at the western (residential) property line.

As shown in **Table 27-1**, the Project is expected to generate noise levels which range from 55.2 dBA to 62.2 dBA at nearest residential use to the west. It should be noted that these estimates are based on anticipated construction activities for the proposed Phase I and 2 facilities.

Table 27-1
Project Construction Noise Levels – Residential Uses to the West

Phase	Equipment	Quantity	Equipment Noise Level at 1,000 feet (dBA Leq)	Combined Noise Level (dBA Leq)
Site Preparation	Rubber Tired Dozers	3	51.7	61.6
	Tractors/Loaders/Backhoes	4	54.0	
Grading	Excavators	2	50.7	62.2
	Graders	1	55.0	
	Rubber Tired Dozers	1	51.7	
	Scrappers	2	53.6	
	Tractors/Loaders/Backhoes	2	54.0	
Building Construction	Cranes	1	46.6	71.9
	Forklifts	3	45.0	
	Generator Sets	1	51.6	
	Tractors/Loaders/Backhoes	3	54.0	
	Welders	1	44.0	
Paving	Pavers	2	48.2	55.2
	Paving Equipment	2	47.0	
	Rollers	2	47.0	
Architectural Coating	Air Compressors	1	47.7	47.7
Worst case construction noise levels				71.9

There are no specific performance standards that apply to construction, but these short-term noise impacts are typically minimized by time restrictions placed on grading permits. Per Riverside County Ordinance No. 847, the following noise restrictions apply to the proposed Project:

- Whenever a construction site is within one-quarter (1/4) mile of an occupied residence(s), no construction activities shall be undertaken between the hours of 6:00 p.m. and 7:00 a.m. during the months of June through September and between the hours of 6:00 p.m. and 7:00 a.m. during the months of October through May.

This is a standard condition and is not considered unique mitigation under CEQA. In addition, the *Noise Analysis* recommended four (4) "project design features" to reduce construction noise. These features are incorporated into this CEQA document as **Project Design Features NOI-DF-2** through **NOI-DF-5** so the County can adequately monitor their implementation.

Adherence to **Project Design Features NOI-DF-2** through **NOI-DF-5** will ensure that noise impacts from Project construction will remain at less than significant levels and will help minimize annoyance in the surrounding community. These measures will apply to all Project-related construction activities.

Operation Noise Impacts

Implementation of the Project involves construction of new institutional uses (i.e., Center for Excellence and Wildfire Conservancy). The main sources of noise would include on-site operational activities from vehicular traffic noise circulating within the parking lot, HVAC equipment, pool equipment, general outdoor recreational activities and future off-site traffic noise. However, the Project is not expected to significantly change the operational activities at the site. The existing Paradise Valley Ranch has been in operation for over 40 years and will continue to be used in a similar manner. The Project does not include firefighting field training exercises that would require the use of firetrucks, sirens, helicopters, water hoses, live regiments, and/or other field training activities and equipment that may generate noise. Due to the physical distance between the Project site and nearest sensitive receptor (at least 1,000 feet to the west), the Project will not generate significant operational noise at the adjacent property line compared to County noise standards. The *Noise Analysis* estimated the Project's operational traffic noise impact would be 40.5 dBA which is below the County's normally acceptable noise standards and will not exceed the County's Noise/Land Use Compatibility normally acceptable CNEL for residential land use.

The *Noise Analysis* also evaluated the change in ambient noise levels during the peak daytime hour from the increased traffic noise along Cactus Valley Road from Project operation. The Noise Analysis determined that the ambient noise level along Cactus Valley Road from Morse Road to the Paradise Valley Ranch is 46.1 dBA while Project traffic is expected to increase noise levels to 48.1 dBA or an additional 2 dBA.

The Federal Highway Administration Highway Traffic Noise Analysis and Abatement Policy and Guidance indicates that a change in noise level of 3 dBA is considered barely perceptible while a change in noise level of 5 dBA is considered readily perceptible to the human ear. Therefore, an increase of 3 dBA or more above ambient conditions is generally considered to be the threshold of significance for causing a substantial permanent increase in noise in rural settings.

In addition, the County has a standard condition for new development requiring that all operational noise activities adhere to the County of Riverside Ordinance 847 sound level standards and shall not exceed at the nearest adjacent property line during all times (including long-term operations). The *Noise Analysis* recommended Design Feature 1 (DF-1) to assure that operational noise impacts of the Project would adhere to the long-term requirements of Ordinance 847. This feature has been incorporated into the CEQA document as **Project Design Feature NOI-DF-1**.

With implementation of **Project Design Feature DF-NOI-1**, the *Noise Analysis* demonstrates the Project will not cause a significant change in the existing traffic noise level near the surrounding residential homes. Therefore, this operational impact is considered to be less than significant, and no mitigation is required.

In summary, with implementation of **Project Design Features NOI-DF-1** through **NOI-DF-4**, potential short-term and long-term noise impacts of the Project will be reduced to less than significant levels and no mitigation is required.

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

Less Than Significant Impact

The *Noise Analysis* included an assessment of vibration impacts using referenced vibration levels and methodology set forth in the Caltrans Transportation and Construction Induced Vibration Guidance Manual. To determine the vibratory impacts during construction, reference construction equipment vibration levels were utilized and then extrapolated to the façade of the nearest adjacent structure. For the proposed Project, the closest sensitive receptors are residential homes located over 1,000 feet west of the site. For purposes of assessing structural impacts from vibration, the nearest sensitive receptors are considered "new residential structures" and no historical or fragile buildings are known to be located within the vicinity of the site.

The construction of any phase of the proposed Project is not expected to require the use of substantial vibration-inducing equipment or activities such as pile drivers or blasting. The main sources of vibration impacts during construction of the Project would be from bulldozer activity during site preparation and grading, loading trucks during excavation, and vibratory rollers during paving. Vibratory rollers would only be used on the paved surface areas of the site which are over 1,000 feet from the nearest structures. **Table 27-2, *Construction Vibration Impacts***, shows the Project's construction-related vibration analysis at the residential structures to the west.

Table 27-2
Construction Vibration Impacts

Construction Activity	Distance to Closest Structure	Duration	Calculated Vibration Level - PPV (in/sec)	Damage Potential Level	Annoyance Criteria Level
Vibratory Roller	1,000 feet	Continuous/ Frequent	0.004	No Impact	Barely Perceptible
Large Bulldozer	1,000 feet	Continuous/ Frequent	0.002	No Impact	Barely Perceptible
Loaded Trucks	1,000 feet	Continuous/ Frequent	0.001	No Impact	Barely Perceptible
Impact Pile Driver	1,000 feet	Continuous/ Frequent	0.026	No Impact	Barely Perceptible

The estimated vibration noise levels at the nearest sensitive receptors are compared to the Caltrans Vibration Manual thresholds. The "worst case" vibratory impact from the site is estimated to be 0.026 PPV (in/sec) at the residential structures to the west. The *Noise Analysis* concluded that the annoyance potential of vibration from construction activities would be "barely

perceptible", and no potential damage is expected to residential structures and modern commercial/industrial buildings in the nearby vicinity.

Therefore, potential vibration impacts from construction or operation of the Project will be less than significant and no mitigation is required.

The following "project design features" were recommended in the Project *Noise Analysis* (DF-1 through DF-4) and represent standard rules and requirements, best practices and recognized design guidelines for reducing noise levels. Therefore, are incorporated into this CEQA document as the following four (4) Design Features to be integrated into the site design and construction management plans as appropriate.

Operational:

NOI-DF-1 All operational noise activities shall adhere to the County of Riverside Ordinance 847 sound level standards and shall not exceed at the nearest adjacent property line during all times.

Construction:

NOI-DF-2 County of Riverside Ordinance No. 847 indicates that construction noise is exempt from the noise ordinance, provided any of the following are satisfied:

- Private construction projects located one-quarter (1/4) of a mile or more from an inhabited dwelling.
- Private construction projects located one-quarter (1/4) of a mile from an inhabited dwelling, provided that:
    - Construction does not occur between the hours of 6:00 PM and 6:00 AM during the months of June through September; and
    - Construction does not occur between the hours of 6:00 PM and 7:00 AM during the months of October through May.

NOI-DF-3 During construction, the contractor shall ensure all construction equipment is equipped with appropriate noise attenuating devices and equipment shall be maintained so that vehicles and their loads are secured from rattling and banging. Idling equipment shall be turned off when not in use.

NOI-DF-4 Locate staging area, generators and stationary construction equipment as far from the nearest residential receptors, as reasonably feasible.

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?	☐	☐	☒	☐

Source(s): Riverside County General Plan, Figure OS-8, *Paleontological Sensitivity*; *Map My County* (**Appendix A**); *Paleontological Resources Assessment Report, Paradise Valley Ranch Project*, prepared by CRMTECH, 7-22-2021 (*Paleontological Report*, **Appendix M**); and County Geologist.

Findings of Fact:

a) Would the Project directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?

Less Than Significant Impact

According to the *Paleontological Report*, the results of the records searches and the literature review suggest that the Project area consists of three distinct geological units: old alluvial fan deposits (*Qof*), Hemet Pluton (*Kh*), and Tonalite of the Coachella Valley (*Kcv*), which have the following descriptions:

- *Qof*: Old alluvial fan deposits geologically dated to the late to middle Pleistocene are sedimentary, moderately consolidated, indurated slightly dissected and consist of reddish brown, gravel, and sand. Thin alluvial-fan deposits of Holocene age may overlie *Qof* deposits in places.
- *Kh*: Hemet pluton geologically dated to the Cretaceous and consisting mainly of biotite-hornblende and biotite tonalite.
- *Kcv*: Tonalite of the Coahuila Valley pluton recorded by Sharp (1967) is relatively homogenous grey, medium grained hornblende-biotite tonalite and minor granodiorite. Weathers to form large boulder outcrops.

The central portion of the approximately 48-acre project area, lying on the relatively level terrain of the valley floor, contains the Pleistocene-aged alluvial deposits, which is considered to have a high potential for paleontological resources. The western, northern, and eastern tips of the project area and the southernmost portion extend to the surrounding hillside, where the Cretaceous pluton outcroppings and Holocene alluvial/residual deposits of weathered bedrock cover most of the rest of the study area.

No paleontological remains were observed on the ground surface of the study area during the field survey. Rocks and outcroppings included tonalite and granodiorite with some quartz monozonite and were consistent with previous geologic observations. Rocks were severely weathered and decomposing into gravel sands, which were the major contributor to sediments observed on the ground among outcrops. Along the northern border of the study area, a discrete outcrop of weathered sedimentary rocks (banded sandstone, or possibly breccia) was identified. Sandstone cobbles were observed as float downslope and into the adjacent valley.

In summary of the research results presented above, the central portion of the project area, lying on the relatively level terrain of the valley floor, contains Pleistocene-aged alluvial deposits (*Qof*),

which is considered to have a high potential for paleontological resources, to a maximum depth of 34 feet below the ground surface. The small portions of the project area that extend to the surrounding hillside, especially at the western, northern, and eastern tips and in the southernmost portion, features Cretaceous pluton outcroppings and Holocene alluvial/residual deposits of weathered bedrock, as does most of the rest of the study area. These geologic units are not conducive to the preservation of paleontological remains, and these areas are therefore low in sensitivity for paleontological resources.

Based on these findings, the following standard conditions shall be implemented to reduce potential impacts to paleontological resources to a level less than significant:

- Preparation of a Paleontological Resources Impact Mitigation Plan prior to the issuance of a grading permit.
- Monitoring all earth-moving operations during project construction in areas mapped as *Qof*. The monitor should be prepared to quickly salvage fossils, if they are unearthed, to avoid construction delays, but must have the power to temporarily halt or divert construction equipment to allow for removal of abundant or large specimens.
- Collection and processing of sediment samples for the recovery of micro fossil remains.
- Identification and analysis of all recovered specimens and curation of specimens at a repository with permanent retrievable storage that would allow for further research in the future.
- Preparation of a report of findings, including an itemized inventory of recovered specimens and a discussion of their significance when appropriate, upon completion of the research procedures outlined above. The approval of the report and the inventory by the County of Riverside would signify completion of these standard practices.

These are considered standard conditions and pursuant to CEQA, are not considered mitigation. Therefore, implementation of the proposed Project will result in less than significant impacts that would directly or indirectly destroy a unique paleontological resource, or site, or unique geologic features.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation 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?	☐	☐	☐	☒
b) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?	☐	☐	☐	☒
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)?	☐	☐	☒	☐

Source(s): *Map My County* (**Appendix A**); Project Plans (**Appendix K**); and Riverside County General Plan Housing Element.

Findings of Fact:

a) *Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No Impact

The Project proposes to repurpose the existing Paradise Valley Ranch (PVR) property to accommodate the west coast "Center of Excellence" for firefighter mental and behavioral health and research/training for the Wildlife Conservancy.

Therefore, implementation of the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. There would be no impact.

b) *Would the Project create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?*

No Impact

As stated in Threshold 29.a, the Project proposes to repurpose the existing PVR property to accommodate the west coast "Center of Excellence" for firefighter mental and behavioral health and research/training for the Wildlife Conservancy.

Since this Project is a rehabilitation of an existing facility, it will not introduce the demand for additional permanent residential housing.

Implementation of the proposed Project would not create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income. There would be no impact.

c) *Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

Less Than Significant Impact

As stated in Threshold 29.a, the Project proposes to repurpose the existing PVR property to accommodate the west coast "Center of Excellence" for firefighter mental and behavioral health and research/training for the Wildlife Conservancy.

The Proposed use is consistent with the San Jacinto Valley Area Plan and the existing RR, RM and OS-CH General Plan land use designations and will not induce substantial 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). Any impacts would be less than significant, and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
PUBLIC SERVICES Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:				
30. Fire Services	☐	☒	☐	☐

Source(s): Riverside County Fire Department (RCFD) website; Ordinance No. 659 (An Ordinance of the County of Riverside Establishing a Development Impact Fee Program); and Google Maps.

Findings of Fact:

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 fire services?

Less Than Significant With Mitigation Incorporated

The Project site is in a rural area served by the Riverside County Fire Department (RCFD) and the California Department of Forestry and Fire Protection (CALFIRE). The site is within the fire service area referred to as "Battalion 5" and the closest station to the site is Station 28 (Sage) located at 35655 Sage Road in the City of Hemet. This station is located 7.6 miles (driving distance) south of the Project site and the approximate response time is 13 minutes assuming an average driving speed of 35 miles per hour. It should also be noted the proposed Project includes the Wildfire Conservancy which is an institution devoted to research on new and better ways of combatting wildfires.

The Project involves construction and operation of a treatment facility (i.e., Center for Excellence) and a wildfire research facility (i.e., Wildfire Conservancy). These facilities would add patients and staff to the site which would incrementally increase the need for fire protection services especially during wind-driven wildfire events. Due to its isolated location and the number of persons who may be present, it is reasonable to recommend these facilities have direct communication with County fire staff in case emergency evacuation is necessary.

As part of the Project approval(s), standard conditions are assessed on the proposed Project to reduce impacts from the proposed Project to fire services. Funding for the RCFD is obtained from various sources, including the County's general fund, city general and benefit assessment funds, and other sources. RCFD capital funding is mostly provided by Development Impact Fees (DIF) collected by Riverside County or by the cities in which the specific project is located, pursuant to Ordinance No. 659. DIF for fire protection shall be paid prior to the issuance of a certificate of occupancy. Payment of DIF is a standard condition of approval and is not considered unique mitigation pursuant to CEQA.

Although there are a number of standard conditions that address fire protection services, the location of and access to the site plus the increased site occupancy as a result of the proposed Project are such that **Mitigation Measure MM-FIRE-2** is recommended to assure that Project

occupants will not be at a significant risk of loss, injury, or death involving wildland fires. (Note that this measure is also recommended under Threshold 44 relative to wildfire risks.)

With implementation of standard conditions of approval, fire protection regulatory compliance, and **Mitigation Measure MM-FIRE-2**, the Project would not 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 fire services. Any impacts are considered less than significant with mitigation.

Mitigation:

MM-FIRE-2 Prior to issuance of a certificate of occupancy, the applicant shall demonstrate the facility has communications equipment sufficient to directly contact and communicate with the Riverside County Fire Department in the event a wildfire threatens the Project facilities/occupants. In addition, the site shall have a public address and/or audible emergency alert system to quickly notify occupants and visitors to the site about emergency conditions or evacuation. This equipment shall be tested at least annually to assure proper function, to the satisfaction of the County Fire Marshal.

Monitoring: To be monitored through the Building Permit Process and site inspections by Riverside County Building and Safety Department and shall be included in the Mitigation Monitoring and Reporting Program for the Project to assure its implementation.

31. Sheriff Services	☐	☐	☒	☐

Source(s): Riverside County Sheriff's Department (RCSD) website; Ordinance No. 659 (An Ordinance of the County of Riverside Establishing a Development Impact Fee Program); and Google Maps.

Findings of Fact:

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 sheriff services?

Less Than Significant Impact

The proposed Project would have law enforcement services available from the Riverside County Sheriff's Department (RCSD). The closest County Sheriff's station to the Project site is the Hemet station located at 43950 Acacia Avenue in the City of Hemet. This station is 14 miles (driving distance) north of the Project site, and the approximate response time is 25 minutes assuming an average driving speed of 35 miles per hour.

As part of the Project approval(s), standard conditions are assessed on the proposed Project to reduce impacts from the proposed Project to sheriff services. The Project applicant shall comply

with the provisions of Ordinance No. 659, which requires payment of the appropriate fees set forth in the Ordinance. Furthermore, the Project must comply with County Ordinance No. 659 to prevent any potential effects to sheriff services from rising to a level of significance. County Ordinance No. 659 establishes the utilities and public services mitigation fee applicable to all projects to reduce incremental impacts to the sheriff services. Payment of DIF is a standard condition of approval and is not considered unique mitigation pursuant to CEQA.

Impacts from implementation of the proposed Project would not 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 sheriff services. Any potential impacts to Sheriff services are considered incremental for the Project, are less than significant, and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

32. Schools	☐	☐	☒	☐

Source(s): Hemet Unified School District website; and Google Maps.

Findings of Fact:

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 schools?

Less Than Significant Impact

The Project area is served by the Hemet Unified School District (HUSD). The schools that serve the Project area are as follows:

- McSweeny Elementary School (grades K-5) located at 451 W. Chambers Avenue in the City of Hemet approximately 8.2 miles (driving distance) northwest of the site;
- Diamond Valley Middle School (grades 6-8) located at 291 W. Chambers Avenue in the City of Hemet approximately 7.6 miles (driving distance) northwest of the site; and
- West Valley High School (grades 9-12) located at 3401 W. Mustang Way in the City of Hemet approximately 9.1 miles (driving distance) northwest of the site.

All of these schools are within a 20-minute drive of the Project site assuming an average driving speed of 35 miles per hour. The Project proposes institutional uses on the site that will not generate students who would require facilities or services of the HUSD.

The Project will be required to pay school fees to the Hemet Unified School District based on occupied or habitable square footage at the time of building permit issuance in order to mitigate

or offset any incremental impacts to school facilities. Payment of school fees is a standard condition and is not considered unique mitigation under CEQA. The proposed Project will not generate new students that would require school facilities or services, so any impacts will be less than significant with the payment of the applicable impact fee.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

33. Libraries	☐	☐	☒	☐

Source(s): Riverside County Library System website; Ordinance No. 659 (An Ordinance of the County of Riverside Establishing a Development Impact Fee Program); Riverside County Library System website; and Google Maps.

Findings of Fact:

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 libraries?

Less Than Significant Impact

The County of Riverside operates a system of thirty-five (35) libraries and two (2) bookmobiles to serve unincorporated populations. The library system manages a library catalog consisting of 1.3 million items in the library system and the annual checkout of over 3.5 million books, audios and videos. The closest libraries to the Project site are the Hemet Public Library located at 300 E. Latham Avenue in Hemet approximately 9.7 miles (driving distance) to the northwest; and the Valle Vista Library located at 25757 Fairview Avenue in Hemet approximately 14 miles (driving distance) to the north.

Library impacts are typically attributed to residential development as reflected in Ordinance No. 659. The Project proposes institutional type uses which will not generate the need for additional library facilities or services.

Implementation of the proposed Project will not result in the expansion of the existing library system or require any new construction of library facilities. The Project site's proposed "institutional" type development may result in an incremental, but less than significant, increase the demand of library services.

The Project applicant shall comply with the provisions of Ordinance No. 659, which requires payment of the appropriate fees set forth in the Ordinance. Adherence to the Ordinance No. 659 is typically a standard condition of approval and is not considered unique mitigation pursuant to CEQA.

With payment of the DIF, any impacts from implementation of the proposed Project that would result in substantial adverse physical impacts associated with the provision of new or physically

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

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 library services, are considered less than significant and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

34. Health Services	☐	☐	☒	☐

Source(s): Riverside County General Plan General Plan EIR No. 441; and Google Maps.

Findings of Fact:

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 health services?

Less Than Significant Impact

The closest comprehensive health service facility to the Project site is the Hemet Valley Medical Center (also known as the Hemet Global Medical Center) located at 1117 E. Devonshire Avenue in Hemet approximately 10 miles (driving distance) to the north. The approximate driving time from the site to this facility would be 20 minutes assuming an average speed of 35 miles per hour. The Project is institutional in nature and will increase the occupancy of the site, but it is not expected to result in a significant increase in the need for health services, the need to alter any existing health service facilities, or result in the need to construct new facilities for any phases of the Project. Therefore, any impacts would be less than significant.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation 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?	☐	☐	☐	☒
c) Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?	☐	☐	☐	☒

Source(s): *Map My County* (**Appendix A**); Ord. No. 460, Section 10.35 (Regulating the Division of Land – Park and Recreation Fees and Dedications); Ord. No. 659 (Establishing Development Impact Fees); and Parks & Open Space Department Review.

Findings of Fact:

a) *Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

Less Than Significant Impact

The Project proposes development of 2 new structures and re-development of a number of existing onsite facilities into the west coast "Center of Excellence" for firefighter mental and behavioral health and research/training site for the Wildfire Conservancy.

The proposed Project includes reconstructing existing and constructing new onsite recreational facilities to serve the patients/guests of the Center for Excellence as well as staff and visitors of the Wildfire Conservancy. However, the Project would not require the construction or expansion of public recreational facilities which might have an adverse physical effect on the environment.

The Project is not expected to have any impacts on recreational facilities and all new or expanded onsite recreational facilities will serve the needs of the Center for Excellence and the Wildfire Conservancy. Any impacts would be less than significant, and no mitigation is required.

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 is at the eastern terminus of Cactus Valley Road. The site is in a very rural area with few improvements and no parks or improved trails. All new or expanded onsite recreational facilities will serve the needs of the Center for Excellence and the Wildfire Conservancy.

The Project would not generate any need for, or use of existing, neighborhood or regional parks, or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. As discussed in Threshold 35.a, the proposed uses do not create impacts to these facilities. No impacts will occur.

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

According to *Map My County*, the Project site is not within an established County CSA. The Project's proposed low intensity "institutional" uses would not create impacts to a CSA or recreation and park district with a Community Parks and Recreation Plan (Quimby fees). No impacts will occur, and no mitigation is required.

Mitigation: No mitigation measures are required.

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

Monitoring: No mitigation monitoring is required.

36. Recreational Trails a) Include the construction or expansion of a trail system?	☐	☐	☒	☐

Source(s): San Jacinto Valley Area Plan (SJVAP) Figure 8, *Trails and Bikeway System;* and Project Plans (**Appendix K**).

Findings of Fact:

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

Less Than Significant Impact

According to SJVAP Figure 8, *Trails and Bikeway System*, there are no Regional Open Space Trails existing or planned on or adjacent to the Project site. The closest planned regional trails to the Project site are on Highway 74 about 8 miles to the north and on Highway 74/243 about 16 miles to the east. The Project will include minor construction or expansion of informal onsite trails if needed during Project site improvements, including erosion control as necessary. Therefore, any impacts from any phase of Project development will be less than significant and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

TRANSPORTATION Would the Project:				
37. Transportation a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	☐	☐	☒	☐
d) Cause an effect upon, or a need for new or altered maintenance of roads?	☐	☐	☒	☐
e) Cause an effect upon circulation during the Project's construction?	☐	☐	☒	☐
f) Result in inadequate emergency access or access to nearby uses?	☐	☒	☐	☐

Source(s): *Paradise Valley Ranch Trip Generation Analysis*, prepared by RK Engineering Group, Inc., 10-8-2021(*Trip Generation Analysis*, **Appendix J1**); *Paradise Valley Ranch Vehicle Miles Traveled Analysis*, prepared by RK Engineering Group, Inc., 10-8-2021(*VMT Analysis*, **Appendix J2**); *General Plan*; *SJVAP Figure 8, San Jacinto Valley Area Plan Trails and Bikeway System*; Ordinance No. 348; *Map My County* (**Appendix A**);

Riverside Transit Agency (RTA) website; Riverside County Transportation Commission website; Ordinance No. 659 (An Ordinance of the County of Riverside Establishing a Development Impact Fee Program); Ordinance No. 824 (An Ordinance of the County of Riverside Authorizing Participation in the Western Riverside County Transportation Uniform Mitigation Fee Program); Ordinance No. 461 (County of Riverside, State of California Road Improvement Standards and Specifications); *Technical Advisory on Evaluating Transportation Impacts in CEQA,* prepared by the California Governor's Office of Planning and Research (*OPR Advisory*) dated 12-2018; *Paradise Valley Ranch Air Quality and Greenhouse Gas Impact Study County of Riverside,* prepared by RK Engineering Group, Inc., 7-23-2021 (*AQ/GHG Study*, **Appendix B**); *Quantifying Greenhouse Gas Mitigation Measures*, California Air Pollution Control Officers Association, dated August 2010; *Emergency Vehicle Access Memo*, prepared by Sladden Engineering, 7-21-2021 (**Appendix N**); and Project Plans (**Appendix K**).

Findings of Fact:

a) *Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*

Less Than Significant Impact

Overview

Although the vehicle miles traveled (VMT) methodology is now applied in evaluating potential transportation impacts of a project, the County's General Plan identifies standards for maintaining an adequate level of service (LOS) for County streets and intersections. To evaluate Project consistency with the General Plan Circulation Element, a Trip Generation Analysis was prepared for the Project. As previously stated, to be consistent with the 2020 CEQA Guidelines, LOS analysis is not required for purposes of this Initial Study impact analysis.

The *Trip Generation Analysis* determined that an LOS analysis was not required due to the relatively small amount of traffic that would be generated by the Project. During weekday conditions, the proposed Project is expected to generate 198 trips per day including 14 AM peak hour trips and 6 PM peak hour trips. The weekend trip generation associated with the proposed project is expected to be even less than the weekday since the weekday has a lower level of staffing.

Based on the *Transportation Analysis Guidelines for Level of Service & Vehicle Miles Traveled (County of Riverside Transportation Department, December 2020),* projects that generate less than 100 peak hour trips are exempt from preparation of level of service and operational analysis and are deemed to have a less than significant level of service (LOS) impact on the surrounding circulation system due to their low number of trips. It should be noted a separate *VMT Analysis* was prepared for this Project (see Threshold 37.b).

Transit. Bus service in western Riverside County is provided by the Riverside Transit Authority (RTA). However, there is currently no bus service in the immediate vicinity of the Project site, mainly due to its rural nature and it is at the end of a long rural road (Cactus Valley Road). It is unknown at this time if the RTA will provide service to this area at some point in the future.

Bicycle and Pedestrian Trails. According to SJVAP Figure 8, *San Jacinto Valley Area Plan Trails and Bikeway System*, there are no Regional Open Space Trails located along Cactus Valley Road or in the immediate surrounding area. Therefore, the Project does not include construction or expansion of any trails at this time. Any impacts will be less than significant.

Roadways. Every county in California is required to develop a Congestion Management Program (CMP) that looks at the links between land use, transportation, and air quality. In its role as Riverside County's Congestion Management Agency, the Riverside County Transportation Commission (RCTC) prepares and periodically updates the County's CMP to meet federal Congestion Management System guidelines as well as state CMP legislation. The Southern California Association of Governments (SCAG) is required under federal planning regulations to determine that CMPs in the region are consistent with the Regional Transportation Plan. The RCTC's current Congestion Management Program was adopted in March 2011.

The RCTC CMP does not require traffic impact assessments for development proposals if they generate less than 50 peak hour trips at a particular intersection. However, local agencies are required to maintain the minimum level of service (LOS) thresholds included in their respective general plans. If a street or highway segment included as part of the CMP falls below the adopted minimum level of service of E, a deficiency plan is required. The Project could conflict with the CMP if the Project were to cause the CMP facility to operate at an unacceptable LOS.

Table 2 of the *Trip Generation Analysis* demonstrates that during weekday conditions, the proposed Project would generate 198 trips per day including 14 AM peak hour trips and 6 PM peak hour trips. Based on the analysis it is anticipated that the Project will not generate 50 or more peak hour trips at any intersection. While the Project does represent an increase in trips, this increase is not considered cumulatively considerable due to the relatively small percentage increase in regional trips it represents.

The Project will also be required to pay its Transportation Uniform Mitigation Fee (TUMF) and Development Impact Fees (DIF), assessed on all County projects, which collectively help reduce overall impacts to the transportation system (i.e., roads and intersections).

Summary. Based on this information, the Project will not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Any impacts will be less than significant, and no mitigation is required.

b) Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact

In response to Senate Bill (SB) 743, the California Natural Resource Agency certified and adopted new CEQA Guidelines in December 2018, which now identify Vehicle Miles Traveled (VMT) as the most appropriate metric to evaluate a project's transportation impact under CEQA (Section 15064.3). Effective July 1, 2020, the previous transportation metric under CEQA, level of service (LOS), typically measured in terms of automobile delay, roadway capacity and congestion, will no longer constitute a significant environmental impact. As a result, a separate VMT analysis was prepared for this Project.

The County of Riverside has updated its traffic study guidelines as contained in the *Transportation Analysis Guidelines for Level of Service & Vehicle Miles Traveled (County of Riverside Transportation Department, December 2020)* to establish requirements and criteria for evaluating VMT on projects. Based on these guidelines, some projects are screened out from requiring a VMT analysis and if the appropriate criteria are met, the project VMT impacts are considered less than significant.

Based on review of the screening criteria, the Project may be screened out of preparing a more detailed VMT analysis based on the "Small Projects" Criteria.

VMT Small Project Criteria

Based on the *County of Riverside Transportation Department, December 2020,* this applies to projects with low trip generation per existing CEQA exemptions or based on the County Greenhouse Gas Emissions Screening Tables, result in a 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO2e) per year screening level threshold. If a project results in GHG emissions less than 3,000 Metric Tons of Carbon Dioxide equivalent (MTCO2e) as determined by a methodology acceptable to the Transportation Department, the proposed project is screened out from requiring a VMT analysis and the VMT impacts are considered less than significant.

Based on the detailed greenhouse analysis and air quality evaluation prepared for the proposed Project (*AQ/GHG Study*), the proposed Project is forecast to result in 802.69 Metric Tons of Carbon Dioxide Equivalent (MTCO2e) per year, which is less than the County's threshold of 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO2e) per year. Therefore, based on the Small Projects criteria, the proposed Project is considered to have a less than significant VMT impact.

In summary, using the *County of Riverside Transportation Department, December 2020*, and based on the *AQ/GHG Study*, the proposed Project is screened out from preparing a detailed VMT analysis, and the Project VMT impacts are considered less than significant since it qualifies under the "Small Projects" criteria.

c) *Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?*

Less Than Significant Impact

The Project site is at the end of a long rural road (Cactus Valley Road) which has two lanes of travel and runs a distance of four miles east from its intersection with State Street. Cactus Valley Road has no sharp curves or dangerous intersections in proximity to the Project site. Farm equipment may occasionally utilize Cactus Valley Road but agricultural uses in this area are of low intensity and do not generate significant traffic volumes.

The Project site plan does not indicate any road improvements are required along Cactus Valley Road to serve the operations of the Center for Excellence or the Wildfire Conservancy.

If any proposed roadway improvements are necessary, they will be installed in conformance with Ordinance No. 461 and will be installed concurrently with other Project utilities or infrastructure facilities. Conditions of approval have been added to the Project to implement Ordinance No. 461. Therefore, implementation of the proposed Project will not create any roadways or road improvements that could increase hazards to a circulation system design feature (e.g., sharp

curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Any impacts are considered less than significant, and no mitigation is required.

d) Would the Project cause an effect upon, or a need for new or altered maintenance of roads?

Less Than Significant Impact

Maintenance of Cactus Valley Road may be incrementally increased by the slight increase in traffic from Project activities (total 198 weekday trips with 14 AM peak hour and 6 PM peak hour trips). However, development of the Project site would not cause a significant effect upon or result in the need for new or altered maintenance of roads since no new roads are being constructed and no existing roads are being substantially altered. Therefore, impacts will be less than significant, and no mitigation is required.

e) Would the Project cause an effect upon circulation during the Project's construction?

Less Than Significant Impact

A limited potential exists to interfere with any emergency response or evacuation plan during construction. Construction work near the Project entrance at the end of Cactus Valley Road will be minimal as no major utility work is required within Cactus Valley Road to serve the Project. Control of access will ensure emergency access to the site and Project area during construction through the submittal and approval of a traffic control plan (TCP) if required by the County (site is at the end of a long rural road so a TCP may not be required).

In addition, compliance with Ordinance No. 457 regulating construction hours of operation and other County of Riverside Transportation Department procedures and permits will ensure that the safety of the traveling public is protected during construction. Following construction, emergency access to the Project site and area will remain as it was prior to the proposed Project.

The proposed Project is required to comply with Fire Department requirements for adequate access. Project site access and onsite circulation will provide adequate access and turning radius for emergency vehicles, consistent with the Fire Department's requirements.

Therefore, the Project will not cause an effect upon circulation during any phase of the Project's implementation. Any impacts will be less than significant, and no mitigation is required.

f) Would the Project result in inadequate emergency access or access to nearby uses?

Less Than Significant with Mitigation Incorporated

The Project will not generate substantial amounts of additional total or peak hour traffic onto Cactus Valley Road so it will not result in inadequate emergency access or access to nearby uses. The County of Riverside Fire Prevention Department has reviewed and conditioned the proposed Project without requiring additional emergency access or secondary access through other uses. Sladden Engineering conducted an "Emergency Vehicle Access" study for the Project site that determined that with proper design and construction the onsite roads could safely accommodate emergency vehicles.

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

However, Section 30 of this Initial Study, evaluating Fire Services, recommended **Mitigation Measure MM-FIRE-2** to make sure the Center for Excellence and the Fire Conservancy can maintain communications with the County Fire Department during wildfires or other emergency conditions.

With implementation of **Mitigation Measure MM-FIRE-2**, any impacts related to inadequate emergency access (in terms of response time will be reduced to less than significant levels.

Mitigation:

MM-FIRE-2 Prior to issuance of a certificate of occupancy, the applicant shall demonstrate the facility has communications equipment sufficient to directly contact and communicate with the Riverside County Fire Department in the event a wildfire threatens the Project facilities/occupants. In addition, the site shall have a public address and/or audible emergency alert system to quickly notify occupants and visitors to the site but only during emergency conditions or a potential evacuation. This equipment shall be tested at least annually to assure proper function, to the satisfaction of the County Fire Marshal.

Monitoring: This measure shall be included in the Mitigation Monitoring and Reporting Program for the Project to assure its implementation.

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

Source(s): SJVAP Figure 8, *San Jacinto Valley Area Plan Trails and Bikeway System;* and Project Plans (**Appendix K**).

Findings of Fact:

a) Would the Project include the construction or expansion of a bike system or bike lanes?

Less Than Significant Impact

According to SJVAP Figure 8, *San Jacinto Valley Area Plan Trails and Bikeway System*, there are no Regional Open Space Trails (or bike lanes) along Cactus Valley Road or in the general vicinity of the Project site. The closest planned regional trails or bicycle lanes to the Project site are on Highway 74 about 8 miles to the north and on Highway 74/243 about 16 miles to the east. The Project will include minor construction or expansion of informal onsite trails if needed during Project site improvements, including erosion control as necessary. Implementation of the Project would not involve the construction or expansion of any trails as part of the regional trail system. Therefore, impacts would be less than significant, and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	☐	☒	☐	☐
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.)	☐	☒	☐	☐

Source(s): County Archaeologist, AB52 Tribal Consultation

Findings of Fact:

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)?*

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.)*

Less Than Significant Impact with Mitigation Incorporated

Changes in the California Environmental Quality Act, effective July 2015, require that the County address a new category of cultural resources – tribal cultural resources (TCR) – not previously included within the law's purview. Tribal Cultural Resources are those resources with inherent tribal values that are difficult to identify through the same means as archaeological resources. These resources can be identified and understood through direct consultation with the tribes who attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may also include other types of resources such as cultural landscapes or sacred places. The appropriate treatment of tribal cultural resources is determined through consultation with tribes.

In compliance with Assembly Bill 52 (AB52), notices regarding this project were mailed to all requesting tribes on April 23, 2021. No response was received from the Ramona Band, Morongo Band, Cahuilla Band of Indians, Colorado River Indian Tribes, the Santa Rosa Band or the Pala Band of Mission Indians.

Consultation was requested by the Soboba Band of Indians, the Agua Caliente Band of Cahuilla Indians, thePechanga Band of Luiseno Indians and the Rincon Band of Luiseno Indians.

The Soboba Band responded in an email letter dated May 25, 2021. This project was discussed during a meeting onJune 09, 2021. Soboba provided information that the project location is in proximity to known sites and is culturally sensitive to the people of Soboba. The cultural report was sent to the tribe on July 29, 2021 followed by the conditions of approval on August 24, 2021. A follow up meeting was held on September 08, 2021 in which Soboba concluded consultation.

The Rincon Band responded in an email letter dated May 13. 2021. Rincon provided information that the project location is within the Traditional Use Area (TUA) of the Luiseño people and within the Band's specific Area of HistoricInterest (AHI). As such, Rincon is traditionally and culturally affiliated to the project area. The cultural report was sent to the tribe on July 29, 2021 followed by the conditions of approval on August 24, 2021. After review of the cultural report the band provided recommendations for archaeological and tribal monitoring during grading activities. Consultation was concluded on September 28, 2021.

The Pechanga Band of Luiseno Indians responded in a email dated May 05, 2021 requesting consultation. The band told Planning that the Project area is part of *'Ataaxum* (Luiseño), and therefore the Tribe's, aboriginal territory as evidenced by the existence of cultural resources, named places, *tóota yixélval* (rock art, pictographs, petroglyphs), and an extensive *'Ataaxum* artifact record in the vicinity of the Project. This culturally sensitive area is affiliated with the Pechanga Band of Luiseño Indians because of the Tribe's cultural ties to this area.

Consultation was initiated on May 25,2021 and the project documents were provided to the tribe. The tribe mentioneda landscape in the Diamond Valley area but provided no specific regarding that landscape. No specific impacts were identified by Pechanga however they did make recommendations/ requests. One request was for all artifacts outside the grading footprint be left in place and a reburial area identified for any resources found during grading activities. Both of these were agreed upon.

Although no specific Tribal Cultural Resources or impacts were identified, all of the consulting tribes expressed concerns that the project has the potential for as yet unidentified subsurface tribal cultural resources. The tribes request that a Native American monitor be present during ground disturbing activities so any unanticipated finds willbe handled in a timely and culturally appropriate manner.

Based on information provided by the consulting tribes this project will require a Native American Monitor to bepresent during ground disturbing activities (**Mitigation Measure MM-CUL-1**). Prior to the issuance of grading permits, the developer/permit applicant shall enter into agreement(s) for NativeAmerican Monitor(s).

The project will also be required to adhere to State Health and Safety Code Section 7050.5 in the event that human remains are encountered and by ensuring that no further disturbance occur until the County Coroner has made the necessary findings as to origin of the remains. Furthermore, pursuant to Public Resources Code Section 5097.98 (b),remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made (**Mitigation Measure MM-CUL-2**).

CEQA requires the Lead Agency to address any unanticipated cultural resources discoveries during Project construction. Therefore, a condition of approval that dictates the procedures to be followed should any unanticipated cultural resources be identified during ground disturbing activities has been placed on this project (**Mitigation Measure MM-CUL-3**).

The proposed Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a Cultural Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k) or is 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.

With the inclusion of these Conditions of Approval/mitigation measures, impacts to any previously unidentified Tribal Cultural Resources would be less than significant.

Mitigation:

MM-CUL-1 Native American Monitoring. Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor.

In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel. In addition, the Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.

The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist shall clear this condition. Monitoring: Native American Monitoring will be conducted by a representative from the consulting tribe(s).

MM-CUL-2 If Human Remains found. In the event that human remains are encountered and by ensuring that no further disturbance occur until the County Coroner has made the necessary findings as to origin of the remains. Furthermore, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made

MM-CUL-3 Unanticipated Resources. The developer/permit holder or any successor in interest shall comply with the following for the life of this permit. If during ground disturbance

activities, unanticipated cultural resources* are discovered, the following procedures shall be followed:

All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representative (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource. Resource evaluations shall be limited to nondestructive analysis.

Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.

* A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other.

** If not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the significance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.

Monitoring: A copy of all agreements between the Project developer and the appropriate Band of Luiseño Indians shall be provided to the County for retention. Field inspections by County Staff shall verify that all aspects of the agreement are being implemented by the developer, professional monitor and Tribal monitors, during ground disturbing activities. Any cultural resources reports produced as a result of Project monitoring shall be provided to the County within 60 days of completion. All reports and field notes shall be retained in the Project file. The Planning Department will also monitor any potential changes to the Project and their impacts to prehistoric resources.

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?	☐	☒	☐	☐

Source(s): County of Riverside, General Plan Amendment No. 960, Environmental Impact Report No. 521, *Section 4.19, Water Resources*, Site Plan; *Paradise Valley Ranch Percolation Testing for On-Site Sewage Disposal Feasibility*, prepared by Sladden Engineering on 3-10-2021 (*Percolation Report,* **Appendix F2**); *Paradise Valley Ranch Preliminary Hydrology Study*, prepared by Valued Engineering, Inc, on 12-2021 (*Hydrology Study*, **Appendix H1**); and *CUP-21-0005 Well and Septic Exhibit,* prepared by 4M Engineering and Development, Inc., 10-1-2021 (**Appendix F3**).

Findings of Fact:

a) Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?

Less Than Significant with Mitigation Incorporated

Water

The Project site currently receives water from several onsite wells although only one of them (Silverado) which is permitted as a community (potable, drinking water) well (the rest are non-potable agricultural wells). As of January 2021, the existing wells produce the following volumes based on their individual conditions and future plans:

Well #6 – Current capacity approximately 28,000 gallons per day subject to seasonal variation. This well is not permitted as a Community well but supports all the facilities of Phase 1B (Ponderosa lodge and Chaparral lodge) and supplements the large pond/reservoir. No modifications to this well are proposed.

Well #8 – Current capacity approximately 68,000 gallons per day capacity subject to seasonal variation. This well is not permitted as a Community well but supports the large pond/reservoir, soccer field irrigation and small Hacienda office and barn. This well will be re-routed to support the temporary office facilities to be constructed as part of Phase 1A. Only office use is contemplated for either the temporary use or possible future Phase 2. The plan is to either retrofit the existing well casing or to drill a parallel well to Community standards and abandon the existing well. This work would be done if and when Phase 1B work is permitted.

Well #9 – Current capacity approximately 17,000 gallons per day capacity subject to seasonal variation. This well is not potable and is not used for any domestic use and serves only the large pond/reservoir. The plan is to either retrofit the existing well casing or to drill a parallel well to Community standards and abandon the existing well. While this work might be done as part of Phase 1A, it may also be possible to extend a line from Well #6 as well and then only perform the new work if and when Phase 2 work is permitted.

Well #7 – Current capacity approximately 47,000 gallons per day capacity subject to seasonal variation.

In comparison, the current facility and existing buildings use an average of 3,300 gallons of water per day. The existing wells currently do not produce sufficient potable water to service the existing buildings and will need to be redrilled or replaced to adequately serve the new administration building as well as new living quarters. The new onsite public water system will be designed and permitted through the County Department of Health to supply potable water to the occupied buildings as well as provide adequate volume and flow for fire protection per the County Fire Department requirements. The redesigned system will include a connection from the wells to the holding tanks with a manifold to split domestic supply from the fire flow to serve new fire hydrants. The new system will be approved as part of the final building plan permit process and obtain a separate permit. The new wells and public water system will meet anticipated water demand for all Project phases and new buildings. The system will likely be phased in concert with new buildings

on the site and will be permitted as needed for each phase. Provision for this new water system is required as part of the County's standard conditions of approval which are considered regulatory compliance and not unique mitigation under CEQA. With implementation of these standard conditions of approval, potential impacts related to water supply for domestic consumption and fire protection will be less than significant.

Wastewater/Sewer

Wastewater and Sewer services are provided to the Project via an onsite septic system. The existing onsite water treatment system (OWTS) consists of seven (7) septic tanks with associated leach fields for the existing buildings, as shown in **Table 40-1, *Existing Onsite Septic System***. The permit information from the County Department of Environmental Health indicates that three of the seven existing septic systems on the Project site need to be replaced.

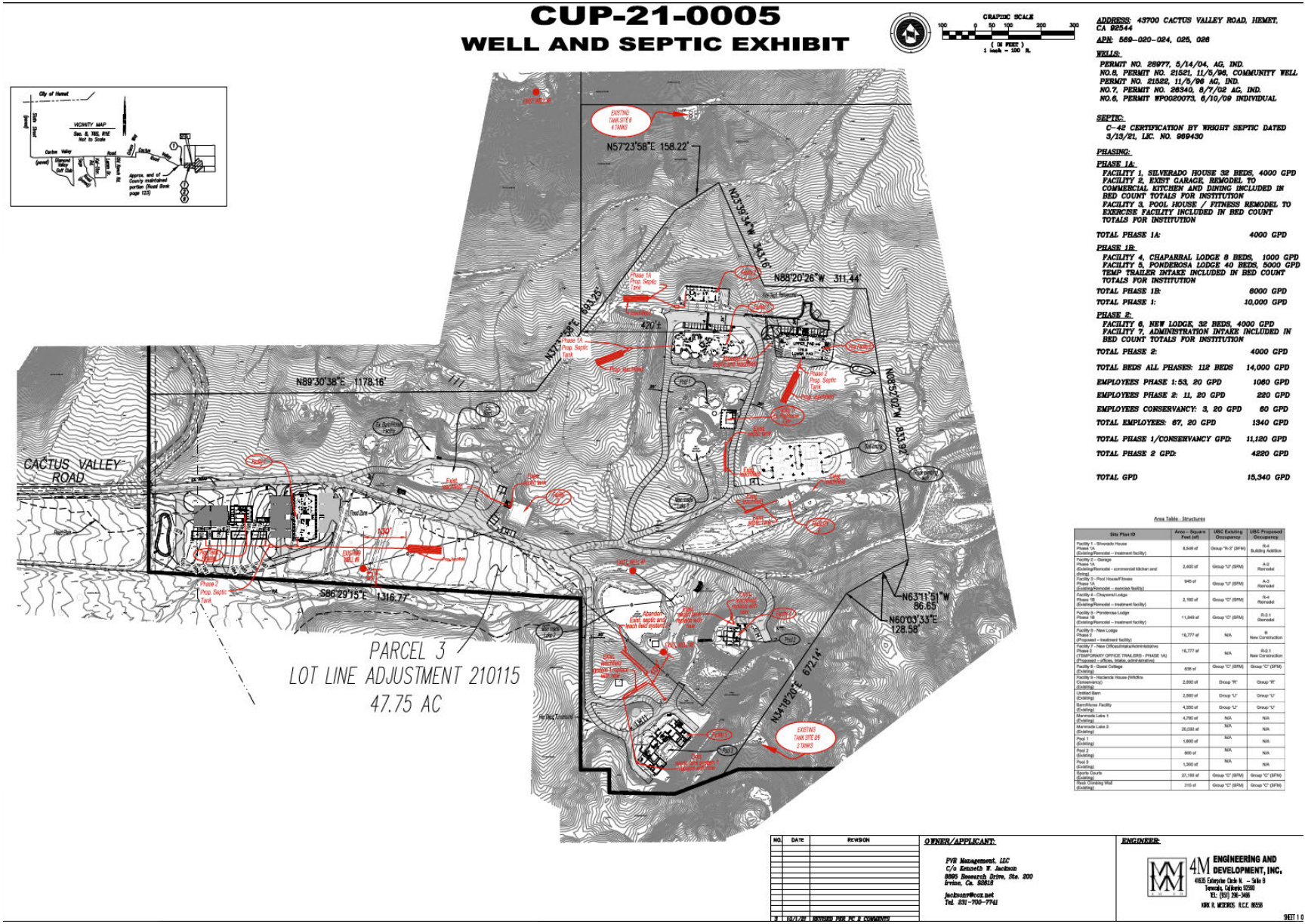
Table 40-1
Existing Onsite Septic System

Building	Septic Tank Capacity	Leach Field Base Area	Status
Office	1,000 gallons	150 square feet	System needs replacing
Main House	2,000 gallons	360 square feet	Adequate at present
Ponderosa #1	1,000 gallons	480 square feet	System needs replacing
Ponderosa #2	1,500 gallons	600 square feet	System needs replacing
Rockwall House	1,200 gallons	150 square feet	Need to expand leach lines
Main Pool House	1,500 gallons	450 square feet	Adequate at present
Small Pool House	1,000 gallons	150 square feet	Need to expand leach lines
Total	**9,200 gallons**	**2,340 square feet**	**3 systems need replacing**

Source: Certification of Existing Subsurface Disposal System Forms, Riverside County Department of Environmental Health, March 2021

The addition of the new administration building, and the new living quarters will require the installation of individual sewage disposal systems. To help design the new system, a percolation test (*Percolation Report*) was conducted on the Project site. Based upon the *Percolation Report* results, leach lines may be designed using an application rate of 20 square feet per 100 gallons of septic tank capacity in accordance with Riverside County guidelines. It is the conclusion of the percolation test that there is sufficient area for the future administration building and new living quarters building for individual sewage disposal systems that will meet the current codes and standards of the County Department of Environmental Health. In addition, the proposed layout of existing and new septic facilities to serve the proposed Project, along with well locations, is provided in **Appendix F3** as developed by 4M Engineering and Development, Inc. (Also reference **Figure 40-1, *Well and Septic Exhibit***). Furthermore, during recent discussions with the Regional Water Quality Control Board (RWQCB), they stated they "did not object to the Project proceeding with Phase 1A, conditioned upon your demonstration of the following: 1) an acceptable and reliable water source has been determined; 2) the use of onsite septic systems complies with Riverside County LAMP requirements; 3) high saline waste resulting from water softener(s), existing or proposed, is not discharged to septic systems; and 4) storm water flows are addressed to avoid any impacts to those areas proposed for septic system use." The Project will be installing the new individual sewage system and facilities in accordance with County regulations including **Mitigation Measures MM-WW-1 and MM-WW-2**. With implementation of these measures, any impacts related to wastewater treatment/septic systems will be reduced to less than significant levels.

FIGURE 40-1
Well and Septic Exhibit



Source: Project Plans (**Appendix K**)

Stormwater/Drainage

As previously discussed in Section 23 of this Initial Study (Hydrology and Water Quality), all new development in the County of Riverside is required to comply with provisions of the National Pollutant Discharge Elimination System (NPDES) program, including Waste Discharge Requirements (WDR), and for properties located within the Santa Ana Watershed - the 2013 Santa Ana Municipal Separate Sewer Permit (MS4) Permit (amended 2015), as enforced by the Santa Ana Regional Water Quality Board (SDRWQCB).

Additionally, there are no storm drains on the project site or within the project vicinity.

The *Hydrology Study* concluded that development of the additional structures will require the development of a detention basin that will comply with NPDES, WDR, MS4, and SDRWQCB requirements, the construction of which will have a less than significant impact on storm water drainage systems.

b) Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less Than Significant Impact

As previously discussed in Threshold 40.a, the Project will provide a phased public water supply and system to the site as needed based on Project phasing and need. The new onsite public water system will be designed and permitted through the County Department of Health to supply potable water to the occupied buildings as well as provide adequate volume and flow for fire protection per the County Fire Department requirements. New wells and the proposed public water system will meet anticipated water demand for all Project phases and new buildings. The system will likely be phased in concert with new buildings on the site and will be permitted as needed for each phase. Provision for this new water system is required as part of the County's standard conditions of approval which are considered regulatory compliance and not unique mitigation under CEQA. With implementation of these standard conditions of approval, potential impacts related to water supply for domestic consumption and fire protection will be less than significant.

Therefore, sufficient water supplies are available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Any impacts are considered less than significant, and no mitigation is required.

Mitigation:

MM-WW-1 **Phase 1A Septic System.** Prior to the issuance of any grading or building permits, the project proponent shall demonstrate that Phase 1A facilities meet the following to the satisfaction of the Santa Ana Regional Water Quality Control Board (SARWQCB) and the Riverside County Department of Environmental Health (RCDEH):

1) The planned development has an acceptable and reliable water source;

2) The use of onsite septic systems complies with Riverside County Local Agency Management Program (LAMP) requirements for onsite wastewater treatment systems;

3) The project proponent demonstrates how it will prevent high saline waste resulting from existing or proposed water softener(s) from being discharged into the onsite septic systems; and

4) The project proponent shall demonstrate how any erosion or other water quality impacts from storm water runoff to those areas proposed for septic system use will be prevented.

MM-WW-2 **Phases 1B and 2 Septic or Alternative System.** Prior to the issuance of any grading or building permit that involve Phase IB or Phase 2 facilities, the project proponent shall obtain approval from the Santa Ana Regional Water Quality Control Board (SARWQCB) and the Riverside County Department of Environmental Health (RCDEH) for wastewater treatment. This treatment can take the form of onsite septic facilities, an onsite centralized treatment system, or connection to an appropriate offsite treatment system. Any new system will require the issuance of waste discharge requirements by and at the discretion of the SARWQCB.

Monitoring: These measures shall be monitored during all phases of Project development and improvements as part of the Mitigation Monitoring and Reporting Program.

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?	☐	☒	☐	☐

Source(s): *Paradise Valley Ranch Percolation Testing for On-Site Sewage Disposal Feasibility*, prepared by Sladden Engineering, 3-10-2021 (*Percolation Report*, **Appendix F2**); *CUP-21-0005 Well and Septic Exhibit,* prepared by 4M Engineering and Development, Inc., 10-1-21 (**Appendix F3**); Project Plans (**Appendix L**); Riverside County, Department of Environmental Health, Review.

Findings of Fact:

a) Would the Project require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?

Less Than Significant with Mitigation Incorporated

Refer also to Thresholds 18.c and 40.a. The Project site contains an existing septic system that will need to be expanded, reconstructed, and new system components installed to serve the new proposed administration building and living quarters. The proposed layout of existing and new septic facilities to serve the proposed Project, along with onsite well locations, is provided in **Appendix F3** as developed by 4M Engineering and Development, Inc. (Also reference **Figure 40-1, *Well and Septic Exhibit***). Furthermore, during recent discussions with the RWQCB, they stated

they "did not object to the Project proceeding with Phase 1A, conditioned upon your demonstration of the following: 1) an acceptable and reliable water source has been determined; 2) the use of onsite septic systems complies with Riverside County LAMP requirements; 3) high saline waste resulting from water softener(s), existing or proposed, is not discharged to septic systems; and 4) storm water flows are addressed to avoid any impacts to those areas proposed for septic system use. However, they added that relative to Phases 1B and 2, the RWQCB would have to review waste discharge requirements of the Project at that time which may include consideration of a centralized wastewater treatment system. Changes or additions to the onsite septic system must be reviewed and approved by the County Department of Environmental Health which has its own subsequent discretionary permitting process for such systems. **Mitigation Measures MM-WW-1 and MM-WW-2** are required to help assure potential impacts related to wastewater treatment/septic systems of the Project will be reduced to less than significant levels.

Other than the proposed onsite septic system, implementation of Phase 1A of the proposed Project will not require, or result in, the construction of new wastewater treatment facilities or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects. With implementation of the recommended mitigation, any short-term (Phase IA) or long-term (Phases 1B and 2) impacts will be reduced to less than significant levels.

b) *Would the Project result in a determination by the wastewater treatment provider that serves or may service the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?*

Less than Significant with Mitigation Incorporated

Phase 1A of the Project development plan will utilize an expanded on-site septic system and will not be connect to any private wastewater/sewer treatment facilities at this time. However, the RWQCB has stated that Phases 1B and 2 will require additional review by the RWQCB regarding waste discharge requirements at that time which may include consideration of a centralized wastewater treatment system. With implementation of the recommended **Mitigation Measures MM-WW-1 and MM-WW-2**, any short-term (Phase IA) or long-term (Phases 1B and 2) impacts will be reduced to less than significant levels.

Mitigation:

MM-WW-1 **Phase 1A Septic System.** Prior to the issuance of any grading or building permits, the project proponent shall demonstrate that Phase 1A facilities meet the following to the satisfaction of the Santa Ana Regional Water Quality Control Board (SARWQCB) and the Riverside County Department of Environmental Health (RCDEH):

1) The planned development has an acceptable and reliable water source;

2) The use of onsite septic systems complies with Riverside County Local Agency Management Program (LAMP) requirements for onsite wastewater treatment systems;

3) The project proponent demonstrates how it will prevent high saline waste resulting from existing or proposed water softener(s) from being discharged into the onsite septic systems; and

4) The project proponent shall demonstrate how any erosion or other water quality impacts from storm water runoff to those areas proposed for septic system use will be prevented.

MM-WW-2 **Phases 1B and 2 Septic or Alternative System.** Prior to the issuance of any grading or building permit that involve Phase IB or Phase 2 facilities, the project proponent shall obtain approval from the Santa Ana Regional Water Quality Control Board (SARWQCB) and the Riverside County Department of Environmental Health (RCDEH) for wastewater treatment. This treatment can take the form of onsite septic facilities, an onsite centralized treatment system, or connection to an appropriate offsite treatment system. Any new system will require the issuance of waste discharge requirements by and at the discretion of the SARWQCB.

Monitoring: These measures shall be monitored during all phases of Project development and improvements as part of the Mitigation Monitoring and Reporting Program.

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?	☐	☐	☒	☐
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)?	☐	☐	☒	☐

Source(s): Riverside County General Plan EIR No. 521, Section 4.17.4, *Solid Waste Management*; Riverside County Municipal Code; Assembly Bill (AB) 939 Riverside County Department of Waste Resources (RCDWR), Planning Section and Countywide Integrated Waste Management Plan; CalRecycle, SWIS Facility Detail, El Sobrante Landfill, 33-AA-0217; El Sobrante Landfill Fact Sheet, issued by Waste Management of California; El Sobrante Landfill Annual Monitoring Report, January 1, 2019 through December 31, 2019, by USA Waste of CA, Inc., 9-2020.

Findings of Fact:

a) Would the Project generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact

Solid waste management in Riverside County is required to comply 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 required 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 Countywide Summary Plan contains goals and policies, as well as a summary of integrated waste management issues faced by the County and its cities. The Summary Plan summarizes the steps needed to cooperatively implement programs among the County's jurisdictions to meet and maintain the 50% diversion mandates. The Countywide Siting Element demonstrates that there are at least 15 years of remaining disposal capacity to serve all the jurisdictions within the County. If there is not adequate capacity, a discussion of alternative disposal sites and additional diversion programs must be included in the Siting Element.

The Riverside County Department of Waste Resources (RCDWR) - Planning Section ensures that the Department's planned and proposed waste management activities and projects are in compliance with applicable federal, State and local land use and environmental laws, regulations, and ordinances.

The RCDWR operates six (6) active landfills (Badlands, Blythe, Desert Center, Lamb Canyon, Mecca II and Oasis) and administers a contract agreement for the private El Sobrante Landfill serving the greater Riverside County area. The RCDWR also oversees several transfer station leases, as well as a number of recycling and other special waste diversion programs.

Municipal waste collection services for the unincorporated East Hemet/Paradise Valley area (Project site is a part) is provided by Waste Management, Inc. The Project site is located in the primary service area of the Lamb Canyon Landfill with additional capacity available at the El Sobrante Landfill for all non-hazardous, non-recyclable, non-green municipal waste.
The Project site is located approximately 15½ miles south/southeast of the Lamb Canyon Landfill and 34 miles east/southeast of the El Sobrante Landfill.

Lamb Canyon Landfill

The Lamb Canyon Landfill is a Class III municipal solid waste facility owned and operated by the Riverside County Department of Waste Resources (RCDWR). It is located in the unincorporated Badlands/Lamb Canyon area of Riverside County, south of Interstate 10 (I-10) and the City of Beaumont, and north of the City of San Jacinto at 16411 Lamb Canyon Road (State Route 79).

The landfill is currently permitted a five-year timeline on (July 2018; CalRecycle SWIS Facility No. 33-AA-0007) to receive 5,000 tons of refuse per day with a permitted Traffic Volume of 913 vehicle per day. The landfill has a maximum elevation of 2,460' AMSL and a maximum depth of 350' below the ground surface.

The maximum permitted capacity is 38,953,653 cubic yards as of January 8, 2015 (most recent published date available) providing capacity and continued operations through April 1, 2029 (estimated closure date).

El Sobrante Landfill

The Project site is located within the service area of the El Sobrante Landfill, a service area that includes the cities/communities within southwestern Riverside County (inclusive of the Project site and the greater Temecula Valley Wine Country), as well as multiple jurisdictions within the counties of Los Angeles, Orange, San Bernardino and San Diego. Located near the center of the highly populated western third of Riverside County, it processes approximately 43% of Riverside County's annual waste, according to Waste Management, Inc., the landfill's operator.

The El Sobrante Landfill is located approximately 34 miles west/northwest of the Project site in the unincorporated Temescal Canyon area of Riverside County between the City of Lake Elsinore and the City of Corona, east of Interstate 15 and Temescal Canyon Road, and south of Cajalco Road, at 10910 Dawson Canyon Road, Corona, CA 91719.

The El Sobrante Landfill facility currently comprises a total area of 1,322 acres which includes a 495-acre footprint permitted for landfill operations, and a 688-acre wildlife preserve.

The current operating permit allows a maximum of 16,054 tons per day of waste to be accepted at the landfill, due to limitations on the number of vehicle trips per day.

2019 Disposal Volumes: During calendar year 2019, a total of 3,419,617 tons of municipal solid waste was disposed at the El Sobrante Landfill. Of this amount, 1,047,785 tons originated from Riverside County sources, and 2,371,832 tons originated from out-of-County sources. El Sobrante received 99,875 tons of Alternative Daily Cover in the form of cement treated incinerator ash.

Based on 307 working days, an average of 11,139 (rounded to nearest whole number) tons of waste were received at the landfill on a daily basis in 2019. This compares with, and is substantially lower than, the maximum 16,054 tons per day allowed under the current permit.

Landfill Capacity Used in 2019 and Landfills Remaining Capacity at End of 2019: Landfill capacity is closely monitored by the Engineering Department at El Sobrante Landfill to ensure that the landfill's operational efficiency is meeting Waste Management and community expectations.

- The Annual Monitoring Report reported 134,549,993 tons remaining at the end of 2018 less the 3,419,617 tons from 2019 yields 132,130,376 tons remaining at the end of 2019.
- At the current rate this equates to approximately 39 years of site life remaining.
- As of November 9, 2018, a modified Solid Waste Facilities Permit for the El Sobrante Landfill was issued which revised the landfill's Estimated Closure Year from 2045 under the former 2009 permit, to 2051 pursuant to the current permit.

The County evaluates current and projected solid waste generation for planning and public policy purposes in conjunction the preparation of its General Plan and General Plan EIR. The anticipated growth in population (from new residential uses) and jobs and economic activity (from commercial, industrial and institutional uses) that would result from the approval and subsequent development of projects within the County result in a corresponding increase in the amount of solid waste generated by these various uses, both during their construction (short-term) and their operation (long-term). The disposal of this additional waste would incrementally increase the wastes going into existing landfills, potentially hastening the end of their usable lives and contributing to the eventual need for new or expanded landfill facilities.

Solid waste generation rates estimate the amount of waste created by residences and businesses over a certain amount of time (day, year, etc.). Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill. Waste generation rates for residential and commercial activities can be used to estimate the impact of new developments on the local waste stream. In this way, they are useful in providing a general level of information for planning purposes and estimating potential effects. It should be noted that the Generation Rates used by the County do not take into account any recycling, reduction or diversion (potentially upwards of 50%-75%, associated with compliance with AB 341.

As set forth in Section 4.17.4 (Solid Waste) of the General Plan Draft Environmental Impact Report (DEIR), the County applies an annual Generation Rate of 0.41 Tons per dwelling unit for residential use, a Generation Rate of 2.4 Tons per 1,000 square feet of building area for commercial use ("commercial" includes commercial-retail, commercial-tourist, commercial-office and business park uses), and a Generation Rate of 10.8 Tons per 1,000 square feet of building area for industrial use ("industrial" includes light industrial, heavy industrial, and [for existing uses] ranches), as shown in **Table 42-1, *Solid Waste Generation Factors – Riverside County General Plan DEIR***.

Table 42-1
Solid Waste Generation Factors - Riverside County General Plan DEIR

Land Use (1)	**Generation Factor**
Residential	0.41 Tons / Dwelling Unit / Year
Commercial (2)	2.4 Tons / 1,000 SF / Year
Industrial (3)	10.8 Tons / 1,000 SF / Year
Notes: 1. Theoretical solid waste generation for the indicated level of development. 2. Includes commercial-retail (40%), commercial-tourist, commercial-office and business park land uses. 3. Includes the following land uses: light industrial, heavy industrial and (for existing uses) ranches.	

Source: Table 14.17-N Riverside County GP-DEIR

There is not a specific category for the Project's proposed special purpose use ("Center of Excellence" for firefighter mental and behavioral health and research/training site for the Wildfire Conservancy).

Furthermore, the Project proposes to repurpose the approximately 48-acre Paradise Valley Ranch (PVR) property to remodel the existing structures and add two new building structures identified as Facility 6 and Facility 7. As such, the Facility 6, listed as a "New Lodge" on the Project Site Plan, is categorized as a Residential Use, and Facility 7, listed as a "Temporary Office Trailer" is categorized as "Commercial" for waste generation calculation purposes as defined on CalRecycle's waste generation website. Therefore, since all other facilities are existing within the Project, only the waste generated by Facility 6 and Facility 7 are calculated for the increase in waste generation and shown in **Table 42-2, *Solid Waste Generation Rates***.

Table 42-2
Solid Waste Generation Rates

Facility #	Use	Metric	Calculation	Waste
6	New Lodge	16 residential dus	4 lbs/du/day <.73 tons/du/yr>	11.68 tons/yr
7	Office Building	16,777 s.f.	6 lbs/1000 s.f./day <1.10 tons/1000 s.f./yr>	18.45 tons/yr
TOTAL				**30.13 tons/yr**

Source: https://www2.calrecycle.ca.gov/wastecharacterization/general/rates
Notes: du – dwelling unit; s.f. - square feet; lbs – pounds; yr - year

The amount of additional solid waste generated by the Project operation would have an incremental, but nominal, impact on the existing solid waste infrastructure at the Lamb Canyon (primary) and El Sobrante Landfills.

Therefore, the proposed Project use would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.

b) *Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?*

Less Than Significant Impact

All land uses within the unincorporated Riverside County area, inclusive of the Project site's unincorporated East Hemet/Paradise Valley area, that generate waste are required to coordinate with the County's contracted waste hauler (Waste Management, Inc.) to collect solid waste on a common schedule as established in applicable local, regional, and State programs.

Additionally, all development within the unincorporated County jurisdiction is required to comply with applicable elements of AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991), AB 939 (CalRecycle), Title 8 of the County Municipal Code, and other local, State, and federal solid waste disposal standards.

The California Integrated Waste Management Act of 1989 (AB 939) requires every city and county in the state to prepare a Source Reduction and Recycling Element to its Solid Waste Management Plan, that identifies how each jurisdiction will meet the mandatory state diversion goal of 50 percent by and after the year 2000. The purpose of AB 939 is to "reduce, recycle, and re-use solid waste generated in the state to the maximum extent feasible."

As set forth in Threshold 42.a, in response to the State requirements, the Riverside County Department of Waste Resources prepared the CIWMP.

All solid waste disposals within the unincorporated County of Riverside are subject to the requirements set forth in *Title 8, Health and Safety*, Chapter 8.136 - Comprehensive Collection and Disposal of Solid Waste within Specified Unincorporated Areas and Chapter 8.24 - County Solid Waste Facilities, other, as provided in the Municipal Code. Chapters 8.136 and 8.24 provide integrated waste management guidelines for service, prohibitions, and provisions of service. The

provisions of service require that the County of Riverside shall provide for or furnish integrated waste management services relating to the collection, transfer, and disposal of refuse, recyclables, and compostables within and throughout the unincorporated County jurisdiction.

The Project would be required to comply with applicable elements of AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991), AB 939, Title 8 of the County Municipal Code, and other applicable local, State, and federal solid waste disposal standards as a matter of regulatory policy, thereby ensuring that the solid waste stream to the waste disposal facilities is reduced in accordance with existing regulations. Any impacts would be less than significant.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation 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?	☐	☐	☒	☐

Source(s): *Paradise Valley Ranch Energy Conservation Analysis County of Riverside,* prepared by RK Engineering Group, Inc., 7-23-2021 (*Energy Analysis*, **Appendix E**); Ordinance No. 461 (County of Riverside Road Improvement Standards and Specifications); Southern California Edison website; Ordinance No. 655 (An Ordinance of the County Of Riverside Regulating Light Pollution); Ordinance No. 659 (An Ordinance of the County of Riverside Establishing a Development Impact Fee Program); Riverside County Network of Care website; and *County of Riverside General Plan EIR No. 521,* Sec.4.10 Energy Resources.

Note: Any tables in this section are from the *Energy Analysis*, unless otherwise noted.

Findings of Fact:

a) 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 to electricity?

Less Than Significant Impact

There are electricity connections currently serving the Project site. Electricity lines are located along Cactus Valley Road frontage immediately westerly of the Project site and are provided by Southern California Edison (SCE).

SCE is responsible for providing power supply to Riverside County while complying with County, State, and federal regulations. SCE's power system is one of the nation's largest electric and gas utilities and serves approximately 15 million people in 180 incorporated cities and 15 counties, in a service area of approximately 50,000 square miles in size (SCE 2019). SCE maintains 12,635 miles of transmission lines, 91,375 miles of distribution lines, 1,433,336 electric poles, 720,800 distribution transformers, and 2,959 substation transformers.

According to the *Energy Analysis*, in 2017, SCE's power mix consisted of 32 percent renewable resources, including wind, geothermal, biomass, solar, and small hydro, 20 percent natural gas, eight percent large hydroelectric facilities, and six percent nuclear. An estimated 34 percent of SCE's power mix consisted of unspecified sources of power in 2017, which is referred to by SCE as electricity from transactions that are not traceable to specific generation sources.

The proposed Project will use electricity for a variety of operational activities including, but not limited to, building heating and cooling, lighting, appliances, electronics, mechanical equipment, electric vehicle charging, and parking lot lighting. Indirect electricity usage is also required to supply, distribute, and treat water for the Project.

Annual electricity consumption for the proposed Project upon full buildout is provided in **Table 43-1, *Project Electricity Consumption***.

Table 43-1
Project Electricity Consumption

Land Use/Activity	Electricity Consumption[1]	
	(kWhr/yr.)[2]	(MBtu/yr.)[2]
Total	**290,433.00**	**990.96**

[1] Based on the *AQ/GHG Study* (**Appendix B**).
[2] kWhr/yr = Kilowatt Hours per Year; MBtu/yr = Million British Thermal Units per Year.

As shown above, the proposed Project's annual electricity consumption at full buildout would result in an estimated 290,433.00 kilowatt-hours per year (kWhr/yr).

The Project's impact is considered less than significant as the Project will be required to comply with the mandatory requirements of California's Building Energy Efficiency Standards (Title 24, Part 6) and Green Building Standards (CALGreen, Title 24, Part 11). California's building energy efficiency standards are some of the strictest in the nation and the Project's compliance with California's building code will ensure that wasteful, inefficient or unnecessary consumption of energy is minimized. The building standards code is designed to reduce the amount of energy needed to heat or cool a building, reduce energy usage for lighting and appliances and promote usage of energy from renewable sources.

Adequate commercial electricity supplies are presently available to meet the incremental increase in demand attributed to the Project. Provision of electricity to the Project site is not anticipated to require or result in the construction of new facilities or the expansion of existing facilities, the construction or relocation of which would cause significant environmental effects to electricity. Impacts in this regard will be less than significant, and no mitigation is required.

b) 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 to natural gas?

Less Than Significant Impact

The Project is expected to use propane for gas to supply energy for cooking, heating and other operational applications associated with the winery production. The Project is not anticipated to have natural gas supplied to the site. All propane used by the Project is expected to be imported and stored on-site via on-site storage tanks.

The Project's estimated operational propane consumption in millions of Btu per year is set forth in **Table 43-2, *Project Propane Consumption***.

Table 43-2
Project Propane Consumption

Land Use/Activity	Propane Consumption[1] (MBtu/yr)[2]
Center for Excellence	302.99

[1] Based on the *AQ/GHG Study* (**Appendix B**)
[2] MBtu/yr. = Million British Thermal Units per Year

t should be noted that propane is referenced in **Table 43-2** while natural gas is referenced in the Air Quality Tables; this is because for purposes of the *AQ/GHG Analysis*, emissions from natural gas usage are calculated since CalEEMod cannot readily calculate propane emissions. Additionally, the quantity of BTU's required for on-site heating/usage (propane or natural gas) would essentially be the same, since BTU's are a standardized metric for measuring heat energy. Lastly, since propane is a relatively clean-burning fuel, with low carbon content, the results of the emissions analysis are conservative.

The Project proposes the use of propane gas and will not connect to the natural gas system. There are adequate natural gas supplies available to meet the incremental increase in demand attributed to the Project. The proposed Project would not require or result in construction, expansion, or relocation of natural gas facilities that could result in a significant environmental effect. Any impacts will be less than significant, and no mitigation is required.

c) 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 to communications systems?

Less Than Significant Impact

Communication systems for the Project area are provided by Frontier Communication, which is a private company that provides connection to the communication system on an as needed basis. No expansion of facilities will be necessary to connect the Project to the existing communication system located adjacent to the Project site, and therefore, would not cause a significant environmental effect to communications systems. Impacts will be less than significant, and no mitigation is required.

d) 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 to street lighting?

Less Than Significant Impact

The proposed Project will not require the installation of any new or additional streetlights along the public Cactus Valley Road rights-of-way.

Any potential impacts from light and glare are discussed in Section 2 (Mt. Palomar Observatory) and Section 3 (Other Lighting Issues) of this Initial Study. The Project would not require new streetlights or relocation of existing streetlights and, as such, there will be no significant environmental effects to street lighting. Impacts will be less than significant, and no mitigation is required.

e) 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 to maintenance of public facilities, including roads?

Less Than Significant Impact

The proposed Project will have a less than significant impact on public facilities. Riverside County Ordinance No. 659 establishes a developer impact fee to mitigate the cost of public facilities, including roads. The Project does not include roads or road improvements requiring or resulting in the construction of new facilities or the expansion of existing facilities.

Prior to the issuance of a certificate of occupancy, the Project applicant shall comply with the provisions of Ordinance No. 659, which requires payment of the appropriate fees set forth in the Ordinance. Any impacts will be less than significant, and no mitigation is required.

f) 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 to other governmental services?

Less Than Significant Impact

Regional Multi-Service Centers impacts are typically attributed to residential development. This is reflected in Ordinance No. 659. Regional Multi-Service Centers are located throughout the County and provide a variety of services on a regional basis with events ranging from: athletic programs, wellness programs, senior citizen activities, arts and crafts, etc. The Project does not have a new residential component; it is a short-term residential care facility.

Prior to the issuance of a certificate of occupancy, the Project applicant shall comply with the provisions of Ordinance No. 659, which requires payment of the appropriate fees set forth in the Ordinance to offset any incremental increase in or demand for such services generated by the Project. Payment of such fees would ensure that the Project would not require or result in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects to other governmental services. Impacts will be less than significant, and no mitigation is required.

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

Mitigation: No mitigation measures are required.

Monitoring: No mitigation 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?	☐	☒	☐	☐
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?	☐	☒	☐	☐
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?	☐	☒	☐	☐
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?	☐	☒	☐	☐

Source(s): *Map My County* (**Appendix A**); *General Plan*; Ordinance No. 787 (An Ordinance of the County of Riverside Adopting the 2016 California Fire Code as Amended); California Department of Forestry and Fire Protection (CALFIRE), Fire and Resource Assessment Program (FRAP) website; Riverside County General Plan, Chapter 6, Safety Element, Figure S-8 *Wind Erosion Susceptibility Areas*; and Ordinance No. 659 (An Ordinance of the County of Riverside Establishing a Development Impact Fee Program); *Emergency Vehicle Access Memo*, prepared by Sladden Engineering, 7-21-2021 (*FPMP*, **Appendix N**); and *Fire Protection and Management Plan, Paradise Valley Ranch*, prepared by Rahn Conservation Consulting, dated 1-2022 (**Appendix O**).

Findings of Fact:

a) Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant With Mitigation Incorporated

According to the state Department of Forestry and Fire Protection (CALFIRE), Fire and Resource Assessment Program (FRAP) and *Map My County*, the Project site is: 1) Classified by Riverside County as being in a Very High Fire Hazard Area; and 2) Located in a State Fire Responsibility Area (SRA).

The Project site currently has a single access point from the eastern terminus of Cactus Valley Road which takes access from County Route R3 which is Cactus Valley Road to the west and Sage Road to the south. Onsite circulation is expected to remain similar to existing patterns. The Project area is rural and mountainous in nature and there is a high potential for wildfire to affect the region. Cactus Valley Road connects back 4 miles to the west with State Street in Hemet which is a community evacuation route as part of the County's adopted emergency response plan/emergency evacuation plan.

The vegetation on the portions of the site that have not been developed or previously disturbed (or landscaped) consist of a number of native associations including brittlebush, California buckwheat, annual grassland, chamise and inland sage scrub, ceonothus, oak grasslands, and scalebroom. These vegetation associations are adapted to and/or highly susceptible to wildland fires, especially during times when hot dry Santa Ana winds below across the region.

The proposed Project would convert the existing onsite buildings into use by the Center of Excellence and the Wildfire Conservancy. Three of the existing buildings would have minor remodeling and two buildings would have extensive remodeling and/or a partial or full rebuild. All upgrades, remodeling, or reconstruction of existing facilities will use the same or similar footprint and size, built to meet the Center of Excellence's future treatment facility needs. One additional facility will be developed on the property to serve as visitor check-in, intake, exams, staff offices, and meeting rooms. A second additional facility will be developed for recovery, lodging, and treatment.

A *Fire Protection and Management Plan* (*FPMP*) was prepared for the Project in July 2021. The *FPMP* recommends a 100-foot fuel modification zone (FMZ) around all facilities and critical infrastructure plus an additional 50-feet of FMZ at each facility out of an abundance of caution where practicable. The *FPMP* also recommends the Project comply with all local amendments by the County of Riverside related to defensible space, fuels management, ignition resistance, and landscaping guidelines described within the Multi-Species Habitat Conservation Plan. To assure the Project meets of the requirements outlined in the *FPMP*, **Mitigation Measure MM-FIRE-1** is recommended.

All new facilities will be constructed to meet or exceed current California Fire and Building Code requirements. The Project will also serve as a demonstration for new fire suppression techniques and building construction/design.

A limited potential exists for the Project to interfere with an emergency response or evacuation plan during construction of the property. Control of access will ensure emergency access to the site and Project area during construction through the submittal and approval of a traffic control plan (TCP). The TCP is designed to mitigate any construction circulation impacts. The TCP is a standard condition of approval and is not considered unique mitigation under CEQA.

The proposed Project will be reviewed, and conditions of approval will be required to address any potential impacts to Fire Resources, consistent with the Fire Hazards section of the Safety Element of the General Plan and Ordinance No. 787. As part of the Project approval(s), standard conditions are assessed on the proposed Project to reduce impacts from the proposed Project to fire services. Prior to final map recordation, prior to grading permit issuance, prior to building permit issuance, and prior to building final inspection, the Project will need to demonstrate compliance with Ordinance No. 787. Adherence to Ordinance No. 787 and other fire protection

regulatory compliance are typically standard conditions of approval and are not considered unique mitigation pursuant to CEQA.

Another standard condition assessed on the proposed Project to reduce impacts from the proposed Project to fire services is Ordinance No. 659. Applicant payment of Development Impact Fees (DIF) for non-residential uses for fire protection will be required prior to the issuance of a certificate of occupancy. Adherence to the Ordinance No. 659 is typically a standard condition of approval and is not considered unique mitigation pursuant to CEQA. The Project applicant shall comply with the provisions of Ordinance No. 659, which requires payment of the appropriate DIF fees set forth in the Ordinance. Adherence to the Ordinance No. 659 and other fire protection regulatory compliance are typically standard conditions of approval and are not considered unique mitigation pursuant to CEQA.

Following construction, emergency access to the Project site and area will remain the same as at present although human activity on the site will increase over existing conditions. This Project site has the following unique constraints relative to emergency access and evacuation:

- The Project area is rural in nature and its vegetation is highly susceptible to wildfires especially those driven by high winds;
- The area has limited fuel breaks/fire roads or other improvements which could help reduce potential fire risks to the Project;
- The Project is institutional and at full occupancy could have over 200 patients, guests, and employees; and
- The only access to the site is via Cactus Valley Road, essentially a four-mile long cul-de-sac, which could limit timely evacuation of the site.

Due to these potential evacuation constraints, **Mitigation Measure MM-FIRE-2** is recommended to assure that Project occupants can evacuate effectively and safely from the area in the event of a wildfire or other emergency.

With implementation of standard conditions of approval, fire protection regulatory compliance, and **Mitigation Measures MM-FIRE-1** and **MM-FIRE-2**, the Project will not substantially impair an adopted emergency response plan or emergency evacuation plan with implementation of standard conditions of approval and fire protection regulatory compliance. Any impacts will be less than significant with mitigation.

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?*

Less Than Significant With Mitigation Incorporated

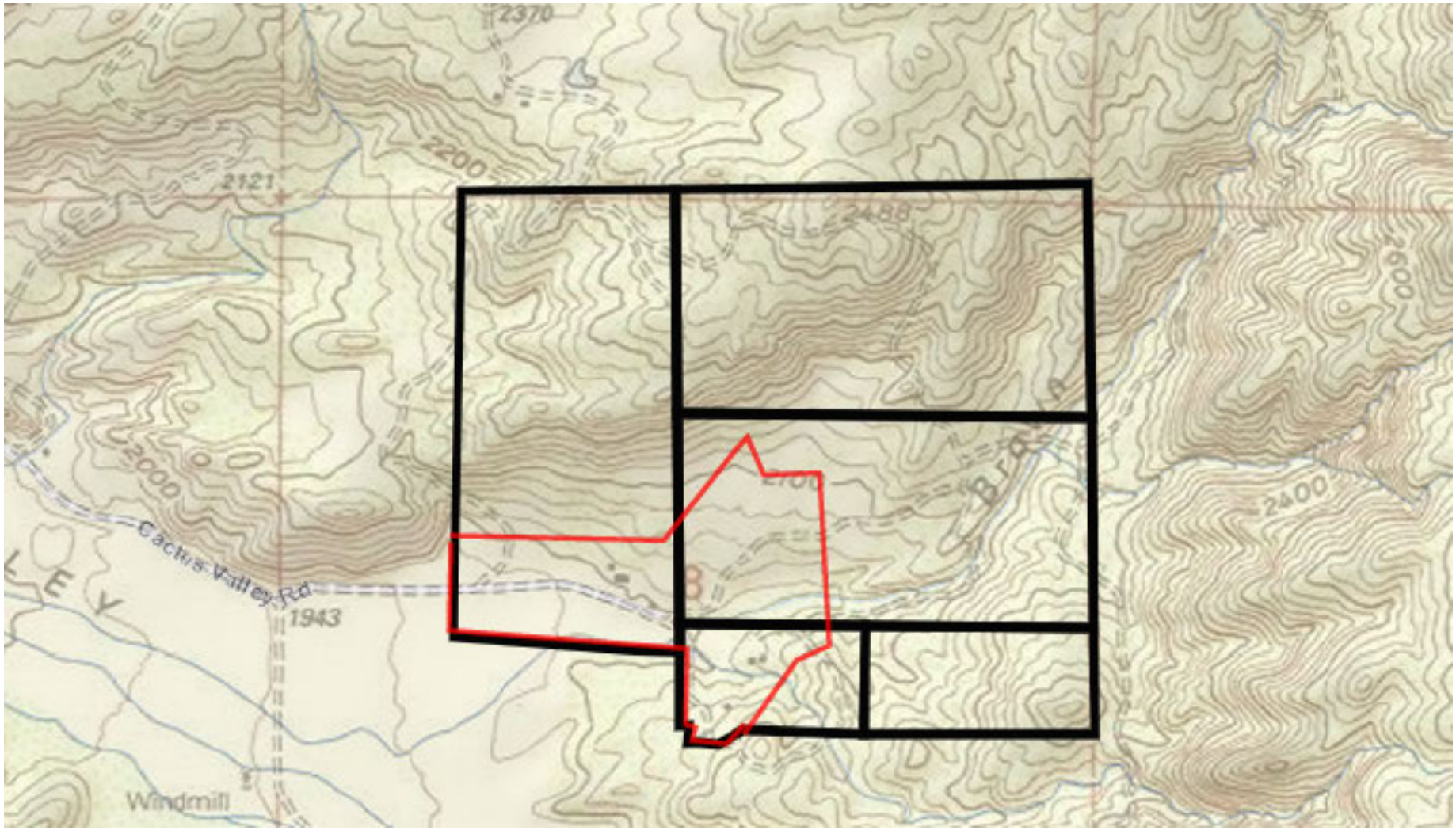
According to the state Department of Forestry and Fire Protection (CALFIRE), Fire and Resource Assessment Program (FRAP) and *Map My County*, the entire Project site and surrounding areas are located within an SRA and a Very High Fire Hazard Area.

The Project site topography rises from the southern portion of the site, adjacent to Cactus Valley Road, with rolling hills and valleys away to the east and north. The site is in a bowl-shaped valley in a very rural area with limited regional access (see **Figure 44-1, *Topographic Map***). The only

access route to and from the site is Cactus Valley Road, a two-lane rural road that connects with State Street approximately four miles to the west. As discussed in Threshold 5.a, the site has a number of limitations, and the Project creates additional constraints that could exacerbate the potential risks of wildfire to the improvements and occupants of the Project. It should also be noted that many of the Project guests/patients will be firefighters who may have breathing difficulties. These ailments would be exacerbated during wildfire conditions when air quality is generally poor.

Due to these constraints, implementation of **Mitigation Measures MM-FIRE-1** and **MM-FIRE-2** are recommended to assure that Project occupants will not be exposed to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

FIGURE 44-1
Topographic Map



Source: Map My County https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public

Note: Red parcel lines added by MFCS, Inc, and indicate the approximately 48-acre CUP Parcel Project Site (LLA210115)

The Project proposes new and repurposed structural improvements which will be built to the most recent fire codes. These codes are designed to suppress fire risks including those from wildfires.

Per the County of Riverside General Plan Safety Element Figure S-8, the Project site and surrounding area has a moderate wind susceptibility. The Project would be required to comply with California Fire Code Chapter 47 and the Riverside County No. 787 Fire Code, which provides requirements to reduce the potential of fires that include vegetation management, construction materials and methods, installation of automatic sprinkler systems, adequate fire flows, etc.

With implementation of standard conditions of approval, fire protection regulatory compliance, and **Mitigation Measures MM-FIRE-1** and **MM-FIRE-2**, the Project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, or would expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Any impacts will be less than significant with standard conditions and the recommended mitigation.

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

Less Than Significant With Mitigation Incorporated

The entire Project site is located within an SRA and a very high fire hazard area.

The proposed Project would convert the existing onsite buildings into use by the Center of Excellence and the Wildfire Conservancy. Three of the existing buildings would have minor remodeling and two buildings would have extensive remodeling and/or a partial or full rebuild. All upgrades, remodeling, or reconstruction of existing facilities will use the same or similar footprint and size, built to meet the Center of Excellence's future treatment facility needs. One additional facility will be developed on the property to serve as visitor check-in, intake, exams, staff offices, and meeting rooms. A second additional facility will be developed for recovery, lodging, and treatment.

All new facilities will be constructed to meet or exceed current California Fire and Building Code requirements, including any private-use solar panel arrays. The Project will also serve as a demonstration for new fire suppression techniques and building construction/design.

Sladden Engineering conducted an "Emergency Vehicle Access" study for the Project site that determined that with proper design and construction the onsite roads could safely accommodate emergency vehicles. To assure the Project's onsite roads mees of the requirements outlined in the Sladden Report, **Mitigation Measure MM-FIRE-3** is recommended.

The Project does not include and or require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. The existing Cactus Valley Road and utilities are in place and currently serving the Project site. This road serves as a fire break west of the site. Refer also to Thresholds 44.a and 44.b for Project conformance to applicable fire-related codes to reduce the potential for wildfire hazards to occur. Any impacts will be less than significant with implementation of the recommended **Mitigation Measure MM-FIRE-3**.

d) *Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

Less Than Significant Impact

The entire Project site is located within a State Fire Responsibility Area (SRA) and a very high fire hazard area. Refer also to Thresholds 23.e and 14.a relative to the potential for flooding and/or landslides to occur.

The site elevation varies from approximately 2,015 feet (minimum) to 2,237 feet (maximum) above mean sea level (AMSL), as set forth in *Map My County* and Google Earth.

The Project will be developed around the existing buildings in the southern flatter portions of the site and include both short- and long-term erosion control measures, including landscaping, to assure there will not be uncontrolled runoff and erosion from the site, both during construction and Project operation. These improvements will serve to stabilize the existing built environment.

Based on this information, the Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Any impacts will be less than significant, and no mitigation is required.

e) *Would the Project expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

Less Than Significant With Mitigation Incorporated

The entire Project site is located within an SRA and a very high fire hazard area.

The proposed Project will be reviewed by the County as part of the discretionary process, and conditions of approval will be placed on the proposed Project to address any potential impacts to Fire Resources, consistent with the Fire Hazards section of the Safety Element of the General Plan, and Ordinance No. 787.

As part of the Project approval(s), standard conditions are assessed on the proposed Project to reduce impacts from the proposed Project to fire services. Prior to final map recordation, prior to grading permit issuance, prior to building permit issuance, and prior to building final inspection the Project will need to demonstrate compliance with Ordinance No. 787. Adherence to Ordinance No. 787 is typically a standard condition of approval and is not considered unique mitigation pursuant to CEQA.

Another standard condition assessed on the proposed Project to reduce impacts from the proposed Project to fire services is Ordinance No. 659. Applicant payment of DIF for expanded non-residential uses for fire protection will be required prior to the issuance of a certificate of occupancy. It is noted, the proposed Project plan will not require any offsite improvements which could create demand for fire services.

The Project applicant shall comply with the provisions of Ordinance No. 659, which requires payment of the appropriate DIF fees set forth in the Ordinance. Adherence to the Ordinance No. 659 is typically a standard condition of approval and is not considered unique mitigation pursuant to CEQA.

Although there are a number of standard conditions that address fire risk, the location of and access to the site plus the nature of the proposed Project are such that **Mitigation Measures MM-FIRE-1** through **MM-FIRE-3** are recommended to assure that Project occupants will not be at a significant risk of loss, injury, or death involving wildland fires.

With implementation of standard conditions of approval, fire protection regulatory compliance, and **Mitigation Measures MM- FIRE -1** through **MM-FIRE-3**, the Project would not expose people or structures either directly or indirectly to a significant risk of loss, injury, or death involving wildland fires. Any impacts are considered less than significant with mitigation.

Mitigation:

MM-FIRE-1 Prior to issuance of a certificate of occupancy, the Project proponent shall demonstrate the site in general, existing facilities, and planned improvements are consistent with the requirements outlined in the Fire Protection and Management Plan, Paradise Valley Ranch, prepared by Matt Rahn et al, dated July 2021. All onsite improvements shall be made to the satisfaction of the County Planning Department, Building and Safety Department, and the Fire Marshal as appropriate.

MM-FIRE-2 Prior to issuance of a certificate of occupancy, the applicant shall demonstrate the facility has communications equipment sufficient to directly contact and communicate with the Riverside County Fire Department in the event a wildfire threatens the Project facilities/occupants. In addition, the site shall have a public address and/or audible emergency alert system to quickly notify occupants and visitors to the site about emergency conditions or evacuation. This equipment shall be tested at least annually to assure proper function, to the satisfaction of the County Fire Marshal.

MM-FIRE-3 Prior to issuance of the first certificate of occupancy, the Project proponent shall demonstrate all onsite roads have been improved per the guidelines outlined in the Emergency Vehicle Access Memorandum prepared by Sladden Engineering, dated July 21, 2021. All onsite road improvements shall be made to the satisfaction of the County Building and Safety Department, and the Fire Marshal as appropriate.

Monitoring: To be monitored through the Building Permit Process and site inspections by Riverside County Building and Safety Department and shall be included in the Mitigation Monitoring and Reporting Program for the Project to assure its implementation.

	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?	☐	☒	☐	☐

Source(s): Staff Review; and Project Plans (**Appendix K**).

Findings of Fact:

Less Than Significant with Mitigation Incorporated

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 population 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.

Please reference the discussions in Section 7 (Biological Resources – Wildlife & Vegetation), Section 8 and 9 (Cultural Resources – Historic Resources and Archaeological Resources), Section 28 (Paleontological Resources – Paleontological Resources), and Section 39 (Tribal Cultural Resources). In addition to the mitigation outlined below, standard conditions will apply to the proposed Project. Any impacts are considered less than significant with mitigation incorporated (see below).

Biological Resources

MM-BIO-1 Consistency with MSHCP Report
MM-BIO-2 Biological Monitor
MM-BIO-3 LAPM Monitoring
MM-BIO-4 Training Sessions
MM-BIO-5 Minimize Impacts to Drainages
MM-BIO-6 Erosion Control Cleanup
MM-BIO-7 Spill Prevention/Notification
MM-BIO-8 Construction Limits
MM-BIO-9 Site Cleanup
MM-BIO-10 Permittee Access
MM-BIO-11 Lighting
MM-BIO-12 Noise
MM-BIO-13 Landscaping
MM-BIO-14 Signage
MM-BIO-15 Weed Abatement/Land Disturbance
MM-BIO-16 Nesting Bird Surveys
MM-BIO-17 Tree Removal
MM-BIO-18 CAGN Monitoring

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

Cultural/Tribal Cultural Resources

MM-CUL-1 Native American Monitoring
MM-CUL-2 If Human Remains Found
MM-CUL-3 Unanticipated Resources

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

Source(s): Staff Review; Sections 1-44; and Project Plans (**Appendix K**).

Findings of Fact:

Less Than Significant Impact

The Project does not have impacts which are individually limited, but cumulatively considerable. As demonstrated in Sections 1 – 44 of this Environmental Assessment, in particular regarding air quality and greenhouse gas emissions that have established thresholds to consider cumulative impacts as well as hydrology and traffic impacts that consider the existing and currently planned development of the area and the specific respective drainage and traffic impacts to the overall area in a cumulative manner. As illustrated in the EA, the Project will not have any impacts that cannot be reduced to less than significant with the incorporation of mitigation, Project design features, and/or conditions of approval. Therefore, no cumulative impacts are anticipated to occur. The impacts of the proposed Project are not considerable when viewed in connection with those of other projects (past, current, or future) as most properties in this area are agricultural, rural, open space, or vacant land. Any impacts are considered less than significant with implementation of standard conditions of approval and mitigation for impacts to biological and cultural resources.

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

Source(s): Staff Review; Sections 1-44; and Project Plans (**Appendix K**).

Findings of Fact:

Less Than Significant with Mitigation Incorporated

Effects on human beings were evaluated as part of this analysis of this Initial Study and found to be less than significant with implementation of mitigation measures, standard conditions, and/or Project design features in aesthetics, air quality, geology and soils, greenhouse gas emissions, hydrology & water quality, noise, public services, and transportation. Based on the analysis and conclusions in this Initial Study, the proposed Project will not cause substantial adverse effects directly or indirectly to human beings. Mitigation was recommended for impacts related to greenhouse gas emissions and hazards (see below), and a number of standard conditions of approval were added for noise impacts.

Therefore, potential direct and indirect impacts on human beings that result from the proposed Project are considered less than significant with mitigation (see below) in addition to implementation of standard conditions.

Wildfire/Public Services-Fire

MM-FIRE-1 Fire Protection and Management Plan
MM-FIRE-2 Fire Department Communication System
MM-FIRE-3 Emergency Vehicle Access Memorandum

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: N/A

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

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

VII. AUTHORITIES CITED

Authorities cited: Public Resources Code – various Sections; California Code of Regulations – various Sections.

VII. SOURCES CITED

Note: All websites were accessed between February and September of 2021 by MFCS, Inc. Staff.

AirNav.com
https://www.airnav.com/

Assembly Bill 52
https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB52

Assembly Bill 939
https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=198919900AB939

California Building Code
http://www.bsc.ca.gov/Home/Current2013Codes.aspx

California Code of Regulations
https://govt.westlaw.com/calregs/Index?bhcp=1&transitionType=Default&contextData=%28sc.Default%29

California Department of Conservation, Farmland Mapping and Monitoring Program
https://www.conservation.ca.gov/dlrp/fmmp

California Department of Forestry and Fire Protection, Fire and Resource Assessment Program
https://www.fire.ca.gov/frap

CalRecycle, SWIS Facility Detail, El Sobrante Landfill, 33-AA-0217
https://www.wmsolutions.com/pdf/factsheet/El_Sobrante_Landfill.pdf

CalRecycle website
https://www.ibisworld.com/industry-statistics/employment/fast-food-restaurants-united-states/

California Geological Survey
www.conservation.ca.gov/cgs

California State Mining and Geology Board
www.conservation.ca.gov/smgb

County Ordinances
http://www.rivcocob.org/ordinances/

County of Riverside, Climate Action Plan Update, November 2019
https://planning.rctlma.org/Portals/14/CAP/2019/2019_CAP_Update_Full.pdf

El Sobrante Landfill Annual Monitoring Report
https://www2.calrecycle.ca.gov/swfacilities/Directory/33-AA-0217

El Sobrante Landfill Fact Sheet, issued by Waste Management of California
http://www.rcwaste.org/Portals/0/Files/ElSobrante/2019/DRAFT%202018%20Annual%20Report.pdf

EnviroStor Department of Toxic Substances Control's Hazardous Waste and Substances Site List (Cortese List)
http://www.envirostor.dtsc.ca.gov

FEMA
https://msc.fema.gov

GeoTracker
http://geotracker.waterboards.ca.gov

Google Earth
www.google.com/earth

Google Maps
https://maps.google.com

Hemet Unified School District
https://www.hemetusd.org/

mindat.org website
https://www.mindat.org/loc-3522.html

Public Resources Code
https://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=PRC&tocTitle=+Public+Resources+Code+-+PRC

Riverside County Department of Waste Resources (RCDWR), Planning Section and Countywide Integrated Waste Management Plan
http://www.rcwaste.org/business/planning; and http://www.rcwaste.org/business/planning/ciwmp

Riverside County Fire Department
http://www.rvcfire.org/stationsAndFunctions/Pages/default.aspx

Riverside County General Plan
https://planning.rctlma.org/General-Plan-Zoning/General-Plan

Riverside County General Plan Environmental Impact Report
https://planning.rctlma.org/Portals/14/genplan/general_plan_2015/DEIR%20521/DEIR%20No.%20521.pdf

Riverside County General Plan, San Jacinto Valley Area Plan
https://planning.rctlma.org/General-Plan-Zoning/General-Plan

Riverside County Library System
http://rivlib.info/riverside-county-library-system/

Riverside County Municipal Code
https://library.municode.com/ca/riverside_county/codes/code_of_ordinances

Riverside County Network of Care
https://riverside.networkofcare.org/

Riverside County Ordinances
https://rctlma.org/Departments/Administrative-Services/Useful-Ordinances

Riverside County Sheriff's Department
www.riversidesheriff.org

Southern California Edison
https://www.sce.com/

Title 24 building requirements
http://www.bsc.ca.gov/codes.aspx

Title 50, Code of Federal Regulations
https://www.gpo.gov/fdsys/granule/CFR-2010-title50-vol2/CFR-2010-title50-vol2-sec17-11

United States Geological Service
www.mrdata.usgs.gov