INITIAL STUDY/
NEGATIVE DECLARATION

for

StaxUp Storage Expansion
Development Plan Application DEV2022-005

Lead Agency:

City of Menifee
29844 Haun Road
Menifee, CA 92586
951.723.3745
Point of Contact: Russell Brown, Senior Planner
rbrown@cityofmenifee.us

Project Proponent:

Strat Property Management
2055 Third Ave, #200
San Diego, CA 92101
619.295.2211
Point of Contact: Don Clauson
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Prepared by:

Matthew Fagan Consulting Services, Inc.
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March 2023

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Commonly Used Abbreviations and Acronyms

AAQS	Ambient Air Quality Standards
AB	Assembly Bill
AC	Acre
A.C.	Asphalt Concrete
ACOE	U.S. Army Corps of Engineers
ADT	Average Daily Traffic
af	Acre-Feet
Afu	Undocumented Artificial Fill
AFY	Acre-Feet Per Year
AM	Morning
AMSL	Above Mean Sea Level
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plans
ARB	Air Resources Board
ARB Handbook	ARB Air Quality and Land Use Handbook
BACMs	Best Available Control Measures
BMPs	Best Management Practices
Btu	British thermal units
BUOW	Burrowing Owl
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalARP	California Accidental Release Prevention Program
CalEEMod™	California Emissions Estimator Model™
Cal/EPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
Cal/OSHA	California Occupational Safety and Health Administration
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CH_4	Methane
CHRIS	California Historical Resources Information System
CIP	Capital Improvement Program
CIWMP	Countywide Integrated Waste Management Plan
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
COA	Conditions of Approval
CY	Cubic Yards
dB	Decibel
dBA	A-Weighted Decibel
dBA CNEL	A-weighted decibel Community Noise Equivalent Level
dBA Leq	A-weighted decibel equivalent noise level
DPM	Diesel particulate matter
DTSC	Department of Toxic Substance Control
EAP	Existing Plus Ambient Growth Plus Project
EAPC	Existing Plus Ambient Growth Plus Project Plus Cumulative
EIA	United States Energy Information Administration
EPA	Environmental Protection Agency
EPD	Environmental Programs Department
FEMA	Federal Emergency Management Act
FHWA	Federal Highway Administration

FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping & Monitoring Program
g/m3	Micrograms Per Cubic Meter
GMZs	Groundwater Management Zones
gpd/ac	Gallons-Per-Day Per Acre
HAP	Hazardous Air Pollutants
HFCs	Hydroflourocarbons
HRA	Health Risk Assessment
ITE	Institute of Transportation Engineers
kW	Kilowatt
KWh	Kilowatt Hours
Leq	Equivalent Energy Level
LID	Low Impact Development
LOS	Level of Service
LST	Localized Significance Thresholds
MBTA	Migratory Bird Treaty Act
MGD	Million Gallons Per Day
MLD	Most Likely Descendent
MM	Mitigation Measure
MMT	Million Metric Tons
MPH	Miles Per Hour
$MTCO_2e$	Metric Tons of Carbon Dioxide Equivalent
MWh	Megawatt-Hour
N_2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO_2	Nitrogen Dioxide
NOA	Naturally Occurring Asbestos
NOAA	National Oceanic and Atmospheric Administration
NOP	Notice of Preparation
NO_X	Oxides of Nitrogen
NPDES	National Pollution Discharge Elimination System
O_3	Ozone
Pb	Lead
PM	Particulate Matter
$PM_{2.5}$	Fine Particulate Matter
PM_{10}	Respirable Particulate Matter
PPV	Peak Particle Velocity
PRC	Public Resources Code
PVC	Polyvinyl Chloride
PV	Photovoltaic
ROG	Reactive Organic Gases
ROW	Right-of-Way
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCG	Southern California Gas Company
SF_6	Sulfur Hexafluoride
SO2	Sulfur Dioxide
SO_X	Oxides of Sulfur
SO_2	Sulphur Dioxide
SO_x	Sulphur Oxides
Sq. Ft.	Square Feet
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TCP	Traffic Control Plan
TCR	Tribal Cultural Resource

UBC	Uniform Building Code
U.S.	United States
USFWS	United States Fish and Wildlife Service
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound

CITY OF MENIFEE

I. CEQA ENVIRONMENTAL CHECKLIST FORM

1. **Project Title:** Development Plan Application DEV2022-005 for StaxUp Storage Expansion at 27887 Holland Road

2. **Lead Agency Name and Address:** City of Menifee, Community Development Department, 29844 Haun Road, Menifee, CA 92586

3. **Contact Person and Phone Number:** Russell Brown, Senior Planner, 951-723-3745

4. **Project Location:** The Project site is located near the southeast corner of Haun Road and Holland Road in the City of Menifee and is currently occupied by the existing StaxUp Storage self-storage facility on 8.4 gross acres. The Project proposes the addition of three (3) new self-storage buildings within the existing StaxUp facility with one (1) three-story building with 31,040 square feet (SF) and two (2) one-story, 2,800 SF buildings within the existing development area, resulting in a total new building area of 36,640 SF on approximately one (1) acre of the existing site. Current access to the site is via one (1) full access unsignalized driveway located along Holland Road. With the expansion of the StaxUp facility, future access would be via two (2) full access unsignalized driveways located along the future frontage road which will be constructed as a result of the approved Holland Road Overpass project. The City General Plan land use designation for the site is Economic Development Corridor (EDC) and its zoning is Economic Development Corridor – Community Core (EDC-CC). The site is 700 feet west of the I-215 Freeway and generally surrounded by vacant land except for an outdoor truck yard to the east. It should be noted the northern portion of the Project site, which is the site of the proposed self-storage expansion, currently contains temporary, unpermitted storage of large vehicles. The surrounding lands have the same General Plan and zoning designations as the Project site. The Holland Road Overpass of the I-215 Freeway will be built just north of the Project site. Reference **Figure 1, *Regional Location Map*** and **Figure 2, *Vicinity Map***.

   A. **Total Project Area:** approximately 8.4 gross acres

   B. **Assessor's Parcel Number:** 360-230-019

   C. **Section, Township & Range:** Section 10, Township 6 South, Range 3 West

   D. **Latitude:** ±33°40'09" North

   E. **Longitude:** ±117°10'26" West

   F. **Elevation:** 1,444 feet above mean sea level (AMSL)

5.A. **Project Applicant/Owners:** Menifee Storage, LP/Strat Property Management, Inc.
2055 3rd Avenue, #200
San Diego, CA 92101

5.B. **Engineer/Representative:** Stevenson, Porto & Pierce, Inc.
451 W. Lambert Road, #216

6. **General Plan Land Use Designation(s):**

   - Existing: Economic Development Corridor (EDC)
   - Proposed: No Change to the General Plan Land Use Designation is proposed.

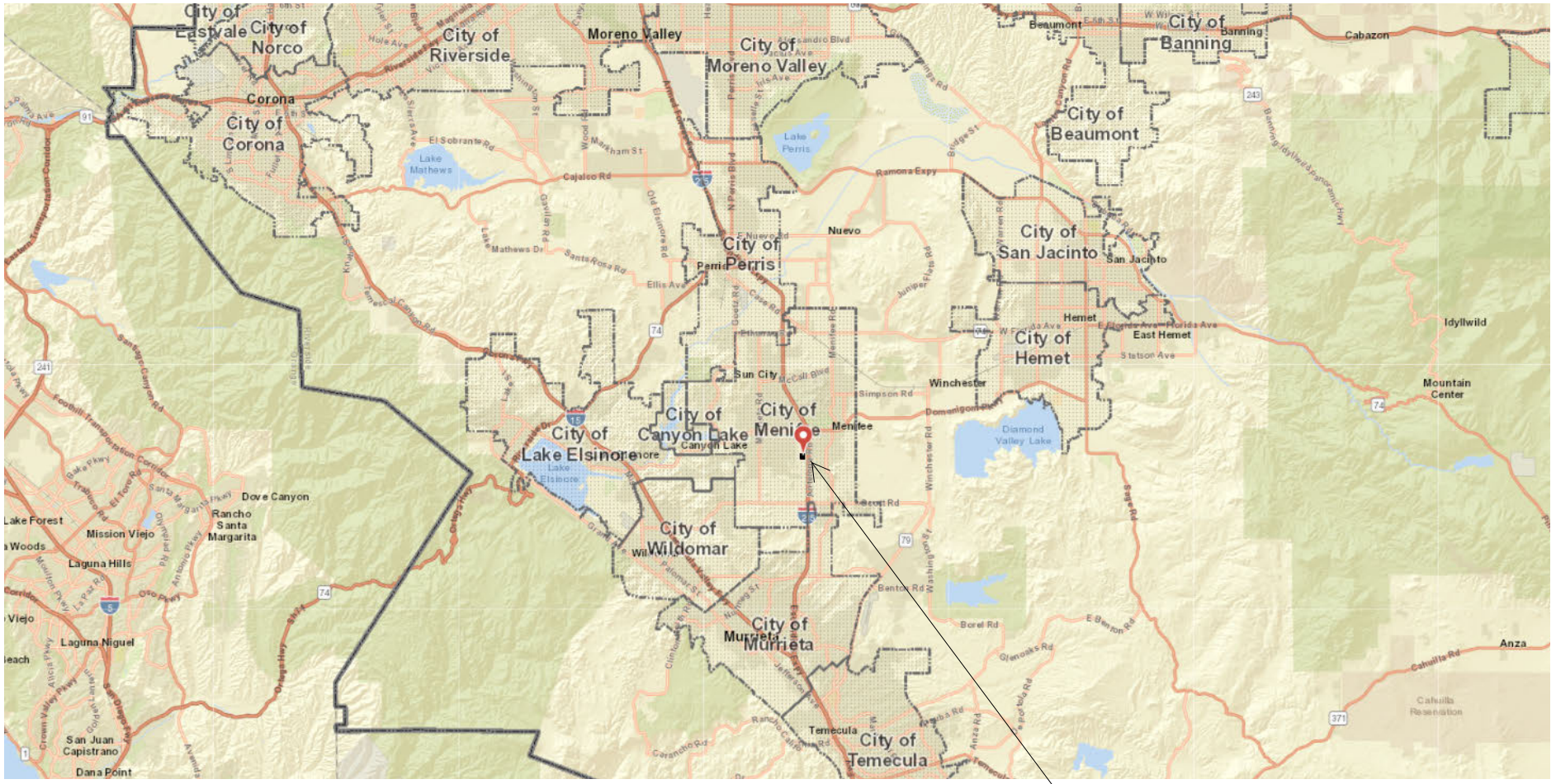
   Reference **Figure 3, *General Plan Land Use Designations***.

7. **Zoning District(s):**

   - Existing: Economic Development Corridor – Community Core (EDC-CC)
   - Proposed: No Change to the zoning classification is proposed.

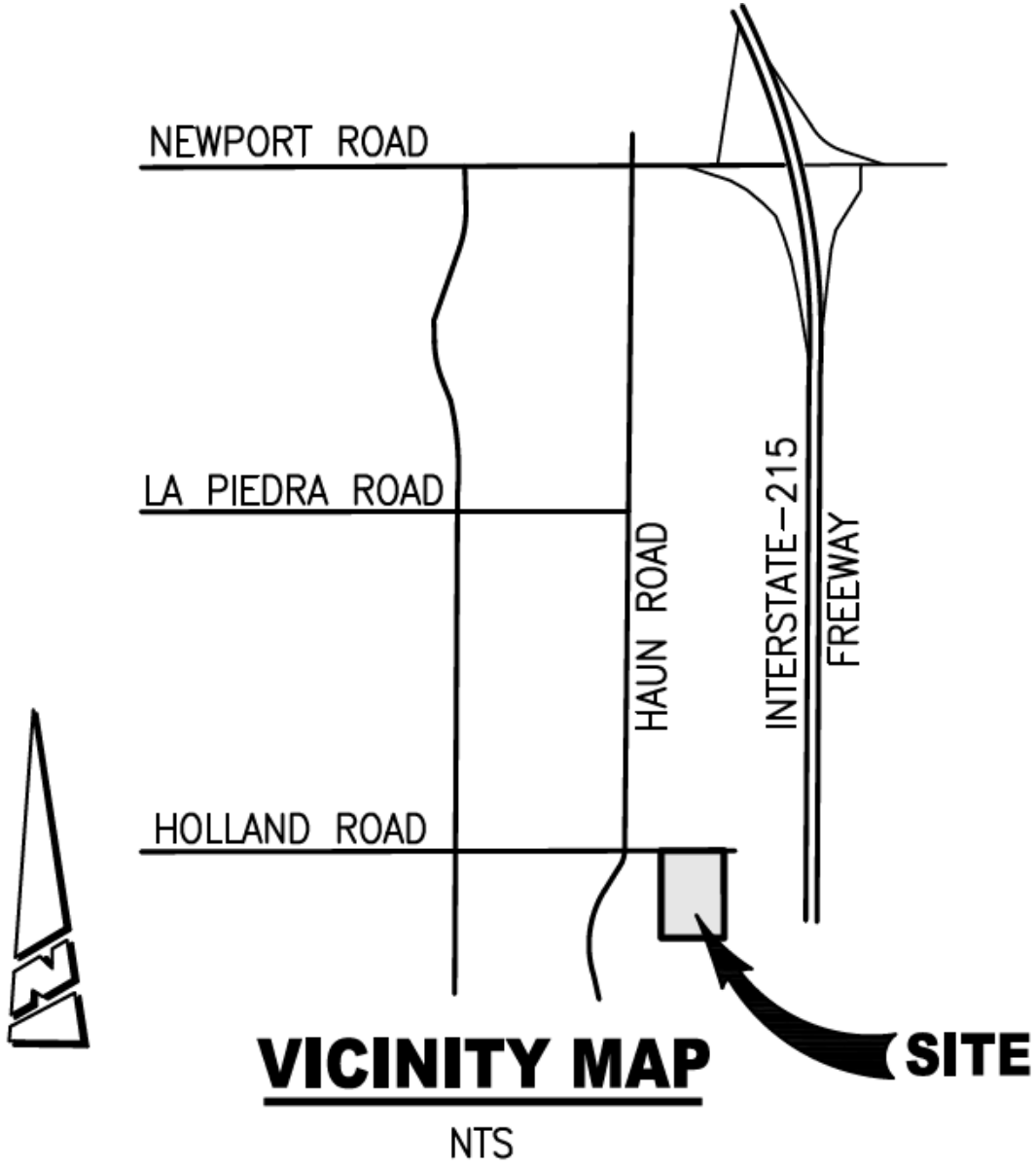
   Reference **Figure 4, *Zoning Classifications***.

FIGURE 1
REGIONAL LOCATION MAP



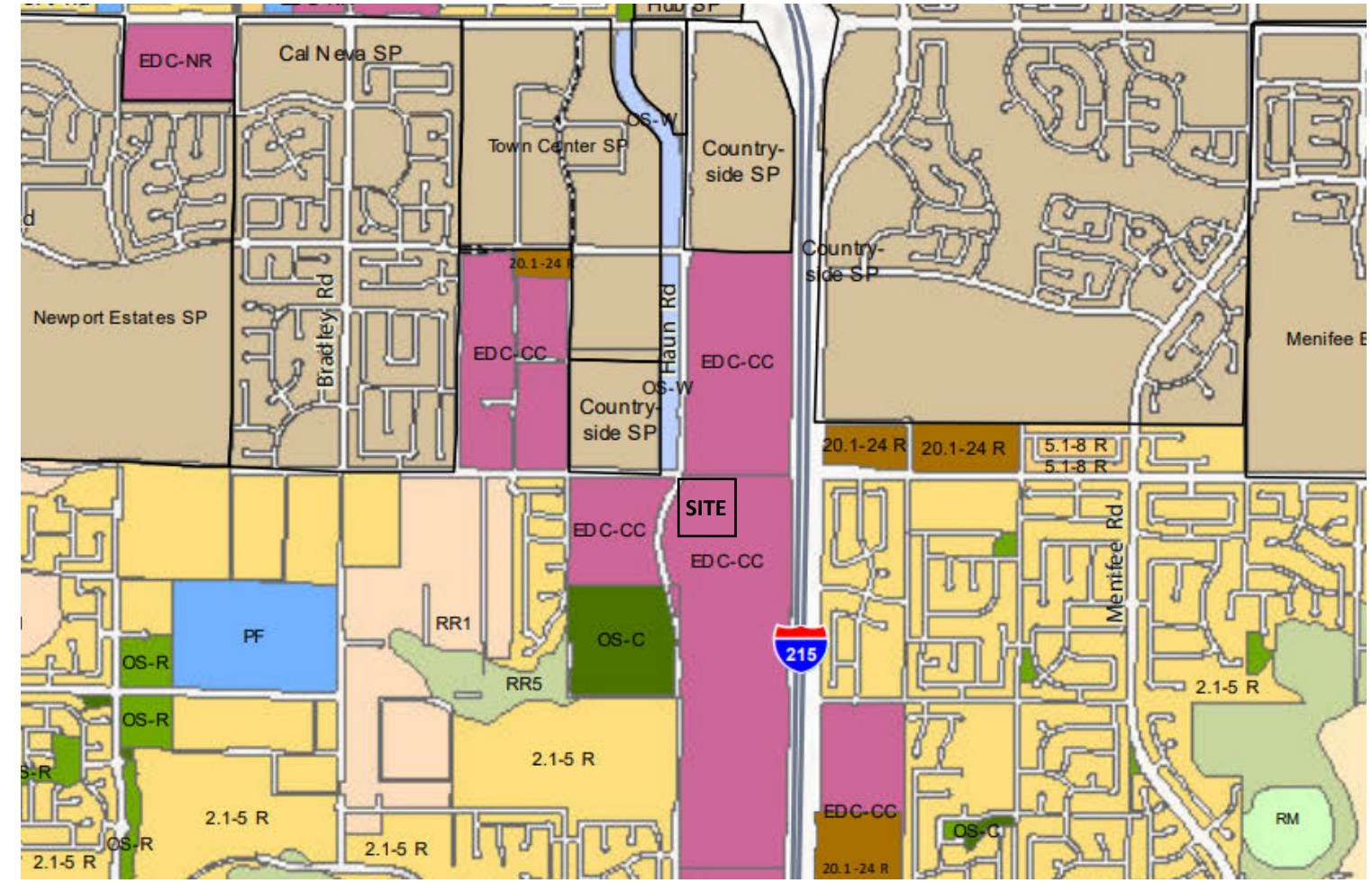
Source: Map My County – https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public

FIGURE 2
VICINITY MAP



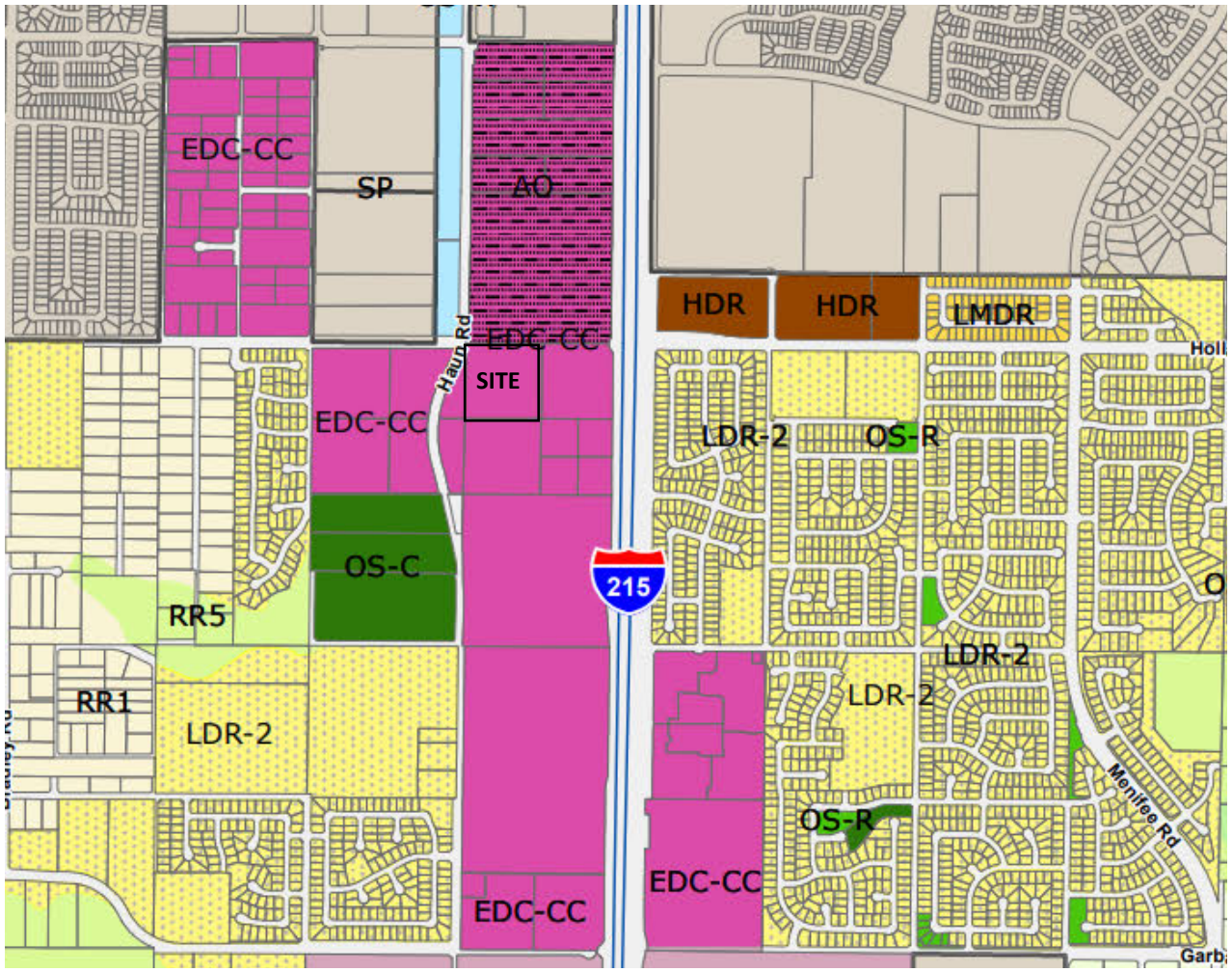
Source: Project Plans – (Appendix G)

FIGURE 3
GENERAL PLAN LAND USE DESIGNATIONS



Source: City of Menifee General Plan Land Use Map - https://cityofmenifee.us/DocumentCenter/View/14673/Exhibit_LU-2_Land-Use-Map_101221

FIGURE 4
ZONING CLASSIFICATIONS



Source: City of City of Menifee Zoning Map - https://cityofmenifee.us/DocumentCenter/View/9432/Zoning-Map

8. Project Description

Overview

The Project includes the following applications:

- Major Modification (MJMOD) No. PLN22-0026
- Major Conditional Use Permit (CUP) No. PLN22-0027
- Minor Exception (ME) No. PLN23-0043

These applications collectively comprise the "Project." The following discussion provides more detail:

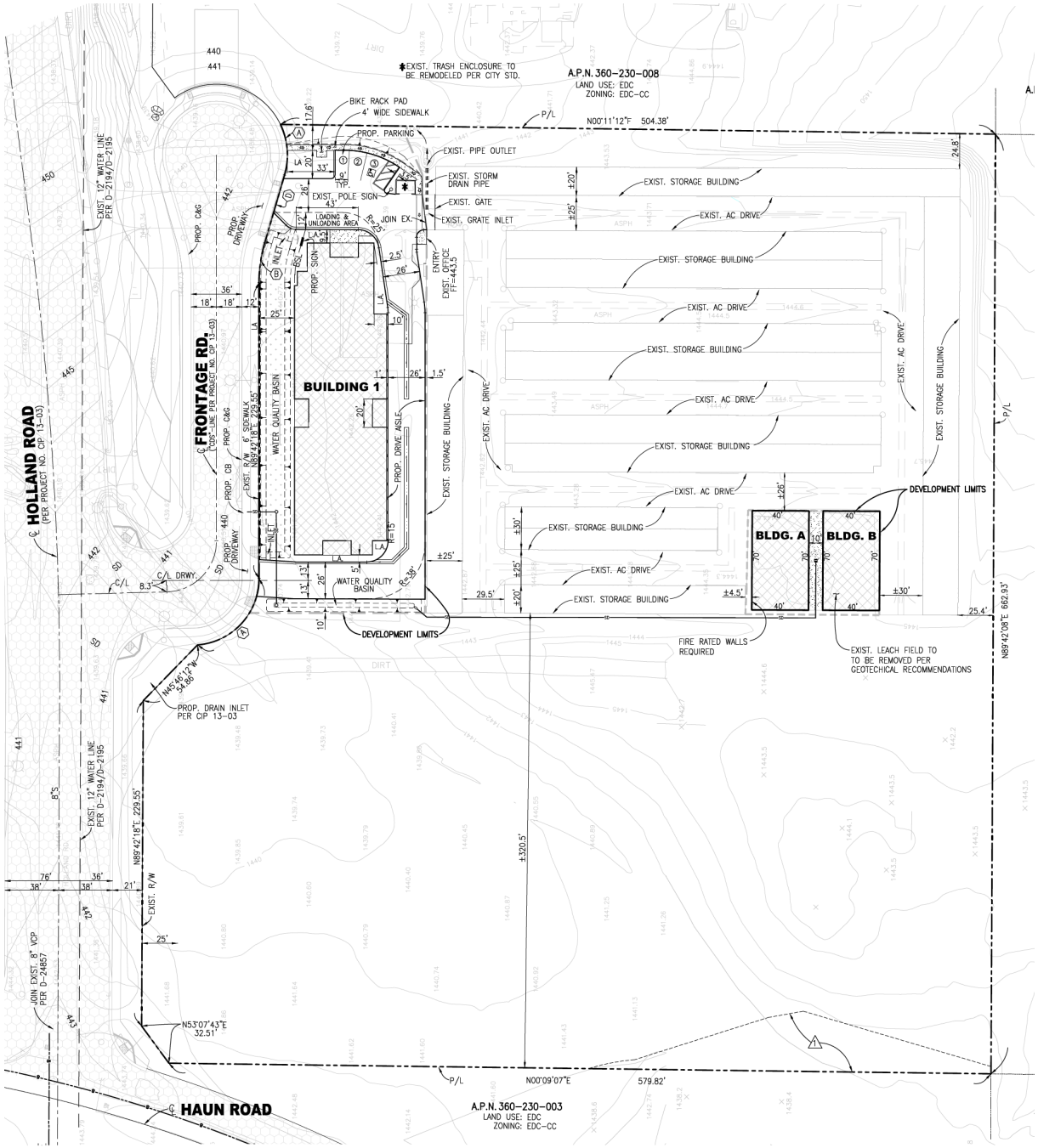
DEV022-005 consists of Major Modification PLN22-0026 and Major Conditional Use Permit PLN22-0027 and Minor Exception (ME) No. PLN23-0043

The applications are for the development of three (3) new buildings on approximately one acre of the existing 8.4-acre (gross) StaxUp Self-Storage Facility. The plan shows the location of the buildings in relation to the existing storage buildings. The largest building, Building 1, is proposed at the north end of the property with two water quality basins while the two smaller Buildings A and B are planned in the southwestern portion of the existing development. The Major Modification is to modify County-approved Plot Plan No. PP14832, previously approved by the County of Riverside. The Conditional Use Permit (CUP) is to allow expansion of the proposed storage expansion under the existing storage use. The ME is for a reduction in the minimum required landscaping (10% reduction).

Access/Circulation

Site access is currently via one (1) full access unsignalized driveway located along Holland Road. The Project would construct two (2) full access unsignalized driveways along the future frontage road which will be constructed as a result of the approved Holland Road Overpass project. Reference **Figure 5, *Site Plan***.

FIGURE 5
SITE PLAN



Source: Project Plans – (Appendix G)

Landscaping

All Project landscaping is subject to the requirements of the City of Menifee Municipal Code. The total area of the Project site is 8.4 gross acres; however, the existing development footprint consists of approximately 3.5 acres. The proposed development footprint consists of approximately 1 acre and includes 15,170 SF of landscaping, including two (2) landscaped water quality basins along the project frontage. All trees, shrubs, and ground cover are native and drought-tolerant and of low to moderate water demand.

Grading

Grading for the Project will require approximately 2,000 cubic yards (CY) of cut and 2,000 CY of fill which will result in a balanced site.

Drainage and Water Quality

In the existing condition, the site consists of a developed self-storage facility with no onsite natural vegetation. The site generally drains toward the north and west and there is a large drainage channel located 300 feet west of the site along the east side of Haun Road.

In the ultimate proposed condition, the Project site will be an expanded self-storage facility. The proposed drainage conditions will include two (2) water quality basins, one (1) on the north side of the site along the frontage road and the second near the northwestern corner of the proposed Project area, along the western driveway. The installation of storm drain facilities that will eventually drain toward the new frontage road. No off-site flows are expected to impact this Project.

Water

The Project site is located within the water service boundary of the Eastern Municipal Water District (EMWD). EMWD has an existing 12-inch water main in Holland Road immediately north of the site and the Project will connect to that line.

Sewer/Septic

The Project site is located within the EMWD sewer service boundary. The Project will connect to existing EMWD sewer lines and EMWD has issued a Will Serve Letter to the Project applicant for sewer service. The Project sewer line will connect to the existing 8-inch EMWD main line in Holland Road just north of the site. The EMWD Will Serve Letter indicates it can adequately serve the proposed Project with regulatory compliance by the Project.

9. Public Services, Utilities and Service Systems

All utilities and public services are currently available on, or adjacent to, the proposed Project site. Utility and Service System providers are as follows:

Electricity:	Southern California Edison
Water:	Eastern Municipal Water District
Sewer:	Eastern Municipal Water District
Cable:	AT&T / Frontier

Gas: Southern California Gas
Telephone: AT&T / Frontier
School: Menifee Union and Perris Union High School District
Police: City of Menifee Police Department
Fire: City of Menifee/Riverside County Fire Department

10. Surrounding Land Uses & Environmental Setting

The Project site is bordered on the north by the eastern-most extension of Holland Road just west of the I-215 Freeway. The General Plan land use designation for the site is Economic Development Corridor (EDC) and its zoning is Economic Development Corridor – Community Core (EDC-CC). The site is generally surrounded by vacant land except for an outdoor truck yard to the east. The surrounding lands have the same General Plan and zoning designations as the Project site. The Holland Road Overpass (I-215 Freeway overpass project) just north of the Project site began construction in December 2022 and is expected to be completed in 2024. The Project site is located near the southeast corner of Haun Road and Holland Road in the City of Menifee, County of Riverside, State of California. Reference **Figure 1, *Regional Location Map*** and **Figure 2, *Vicinity Map***.

The elevation of the subject property is approximately 1,444 feet AMSL with a gentle topographic gradient to the north and west. The surrounding area is generally flat as well. Reference **Figure 6, *Aerial Photo***.

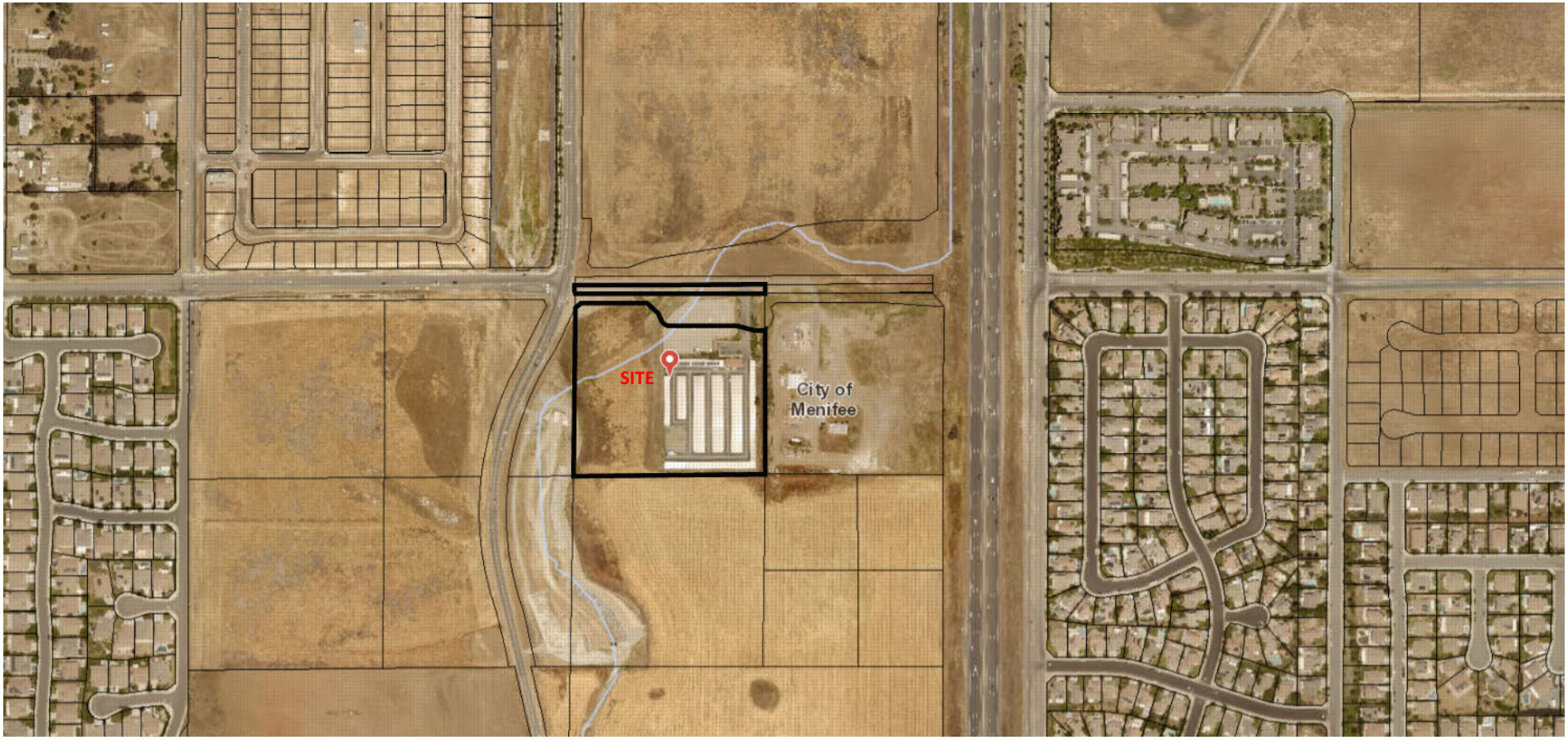
Table 1, *Surrounding Land Uses*, lists the different uses that are located immediately adjacent to the proposed Project site. Also, please reference **Figure 3, *General Plan Land Use Designations*** and **Figure 4, *Zoning Classifications***.

Table 1
Surrounding Land Uses

Direction	General Plan Land Use Designation	Zoning Classification	Existing Land Use
Project Site	Economic Development Corridor (EDC)	Economic Development Corridor – Community Core (EDC-CC)	StaxUp Self-Storage Facility
North	EDC	EDC-CC	Undeveloped Land (Holland Road Overpass planned)
South	EDC	EDC-CC	Undeveloped land
East	EDC	EDC-CC	Outdoor truck yard, undeveloped land, and I-215 Freeway
West	EDC	EDC-CC	Undeveloped land and Haun Road

Sources: City of Menifee General Plan – Land Use Map, City of Menifee Zoning Map, and Google Earth

FIGURE 6
AERIAL PHOTO



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

11. Project Approvals

Implementation of the proposed project would require the following discretionary and ministerial project approvals from the City of Menifee.

Discretionary Approvals Requested

- Major Modification
- Major Conditional Use Permit
- Public Works/Engineering (grading permit)
- Public Works/Engineering (general state water quality permit)
- Building Permit
- Encroachment Permit

Other Agency Actions

- Riverside County Fire Department (for emergency site access review)
- Eastern Municipal Water District (offsite sewer connection)

II. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

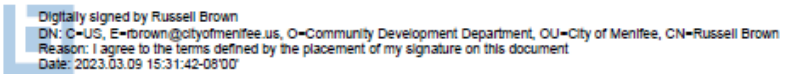
The environmental factors checked below (X) would be potentially affected by this project, involving at least one impact that is either a “Potentially Significant Impact” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

- ☐ Aesthetics
- ☐ Agriculture & Forestry 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
- ☐ Population and Housing
- ☐ Public Services
- ☐ Recreation
- ☐ Transportation
- ☐ Tribal Cultural Resources
- ☐ Utilities and Service Systems
- ☐ Wildfire
- ☐ Mandatory Findings of Significance

III. DETERMINATION

On the basis of this initial evaluation:

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



Signature	Date
Russell Brown, Senior Planner	
Printed Name	

IV. EVALUATION OF ENVIRONMENTAL IMPACTS

1. AESTHETICS.

Source(s): Public Resources Code Section 21099; City of Menifee General Plan (*General Plan*); City of Menifee General Plan Environmental Impact (*GPEIR*) *(*Chapter 5.1, *Aesthetics)*; *Map My County* (**Appendix A**); Project Plans (**Appendix G**); **Figure 1, *Regional Location Map***; **Figure 2, *Vicinity Map***; **Figure 3, *General Plan Land Use Designations***; **Figure 4, *Zoning Classifications***; **Table 1, *Surrounding Land Uses***; **Figure 5, *Site Plan***; and **Figure 6, *Aerial Photo***, all provided in Section I. of this Initial Study.

Applicable General Plan Policies:

- **Goal CD-3:** Projects, developments, and public spaces that visually enhance the character of the community and are appropriately buffered from dissimilar land uses so that differences in type and intensity do not conflict.
- **Policy CD-3.1:** Preserve positive characteristics and unique features of a site during the design and development of a new project; the relationship to scale and character of adjacent uses should be considered.
- **Policy CD-3.2:** Maintain and incorporate the City's natural amenities, including its hillsides, indigenous vegetation, and rock outcroppings, within proposed projects.
- **Policy CD-3.3:** Minimize visual impacts of public and private facilities and support structures through sensitive site design and construction. This includes but is not limited to: appropriate placement of facilities; undergrounding, where possible; and aesthetic design (e.g., cell tower stealthing).
- **Policy CD-3.5:** Design parking lots and structures to be functionally and visually integrated and connected; off-street parking lots should not dominate the street scene.
- **Policy CD-3.6:** Locate site entries and storage bays to minimize conflicts with adjacent residential neighborhoods.
- **Policy CD-3.8:** Design retention/detention basins to be visually attractive and well integrated with any associated project and with adjacent land uses.
- **Policy CD-3.9:** Utilize Crime Prevention through Environmental Design (CPTED) techniques and defensible space design concepts to enhance community safety.
- **Policy CD-3.10:** Employ design strategies and building materials that evoke a sense of quality and permanence.
- **Policy CD-3.11:** Provide special building-form elements, such as towers and archways, and other building massing elements to help distinguish activity nodes and establish landmarks within the community.
- **Policy CD-3.12:** Utilize differing but complementary forms of architectural styles and designs that incorporate representative characteristics of a given area.
- **Policy CD-3.13:** Utilize architectural design features (e.g., windows, columns, offset roof planes, etc.) to vertically and horizontally articulate elevations in the front and rear of residential buildings.
- **Policy CD-3.14:** Provide variations in color, texture, materials, articulation, and architectural treatments. Avoid long expanses of blank, monotonous walls or fences.
- **Policy CD-3.16:** Avoid use of long, blank walls in industrial developments by breaking them up with vertical and horizontal facade articulation achieved through stamping, colors, materials, modulation, and landscaping.
- **Policy CD-3.17:** Encourage the use of creative landscape design to create visual

interest and reduce conflicts between different land uses.

- **Policy CD-3.18:** Require setbacks and other design elements to buffer residential units to the extent possible from the impacts of abutting roadway, commercial, agricultural, and industrial uses.
- **Policy CD-3.19:** Design walls and fences that are well integrated in style with adjacent structures and terrain and utilize landscaping and vegetation materials to soften their appearance.
- **Policy CD-3.20:** Avoid the blocking of public views by solid walls.
- **Policy CD-3.22**: Incorporate visual buffers, including landscaping, equipment and storage area screening, and roof treatments, on properties abutting either Interstate 215 or residentially designated property.
- **Goal CD-4:** Recognize, preserve, and enhance the aesthetic value of the City's enhanced landscape corridors and scenic corridors.
- **Policy CD-4.1:** Create unifying streetscape elements for enhanced landscape streets, including coordinated streetlights, landscaping, public signage, street furniture, and hardscaping.
- **Policy CD-4.2:** Design new and, when necessary, retrofit existing streets to improve walkability, bicycling, and transit integration; strengthen connectivity; and enhance community identity through improvements to the public right-of-way such as sidewalks, street trees, parkways, curbs, street lighting, and street furniture.
- **Policy CD-4.3:** Apply special paving at major intersections and crosswalks along enhanced corridors to create a visual focal point and slow traffic speeds.
- **Policy CD-4.4:** Frame views along streets through the use of wide parkways and median landscaping.
- **Policy CD-4.8:** Preserve and enhance view corridors by undergrounding and/or screening new or relocated electric or communication distribution lines, which would be visible from the City's scenic highway corridors.

Analysis of Project Effect and Determination of Significance:

Public Resources Code Section 21099 pertains to “Modernization of Transportation Analysis for Transit-Oriented Infill Projects.” The Project does not meet any of the criteria of a transit-oriented development. Therefore, the provisions of Public Resources Code Section 21099 are not applicable.

Except as provided in Public Resources Code Section 21099, would the Project?	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Have a substantial adverse effect on a scenic vista?				**X**

No Impact

Scenic vistas can be impacted by development in two ways. First, a structure may be constructed that blocks the view of a vista. Second, the vista itself may be altered (e.g., development on a scenic hillside). The natural mountainous setting of the Menifee area is critical to its overall visual character and provides a variety of scenic vistas for the community.

Topography and a lack of dense vegetation or urban development offer scenic views throughout the City of Menifee (City), including to and from hillside areas. Scenic

features include gently sloping alluvial fans, rugged mountains and steep slopes, mountain peaks and ridges, rounded hills with boulder outcrops, farmland and open space. Scenic vistas provide views of these features from public spaces.

Many of the scenic resources are outside the City limits. Scenic views from Menifee include the San Jacinto Mountains to the northeast and east; the San Bernardino Mountains to the north; the San Gabriel Mountains to the northwest; and the Santa Ana Mountains to the west and southwest.

The Project site comprises a gently sloping valley just west of the I-215 Freeway and the hills to the west. The immediate area surrounding the site is vacant land except for an outdoor truck yard just east of the site. There are newer residential subdivisions further to the west and northwest and a community commercial center and City Hall north of the site along Haun Road. The Project site and surrounding area are all designated Economic Development Corridor (EDC) in the General Plan and all zoned Economic Development Corridor-Community Core (EDC-CC).

The Project site is located in the southern portion of the City of Menifee, County of Riverside, State of California. Reference **Figure 1, *Regional Location Map***, **Figure 2, *Vicinity Map***, **Table 1, *Surrounding Land Uses***, and **Figure 6, *Aerial Photo***, provided in Section I. of this Initial Study.

The Project site is relatively flat with an onsite elevation of approximately 1,444 feet above mean sea level (AMSL). The site is currently developed with the StaxUp Self-Storage Facility and the Project involves an expansion of the storage facility utilizing the northern portion of the site which currently is being utilized for temporary, unpermitted storage of large vehicles.

The proposed Project will minimally change the visual character of the Project site by adding three (3) commercial buildings and landscaping to the existing storage facility. More specifically, the proposed Project consists of one (1) three-story, 31,040 square foot (SF) building and two (2) one-story, 2,800 SF buildings within the existing development area, resulting in a total new building area of 36,640 SF on approximately one (1) acre of the existing site.

The proposed Project site is located within a rural largely vacant portion of the City west of the I-215 Freeway along Haun Road. This area is slowly suburbanizing with several subdivisions further to the west and northwest (north of Holland Road) and commercial uses north of the site along Newport Road and Haun Road, including the City Hall. The Project site and surrounding areas, including Haun Road and the freeway, have public views of various mountains and foothills generally in all directions. The Project proposes low-scale commercial buildings similar to those already on the site except that the new Building 1, in the northern portion of the site, will be 3-story and house storage plus the facility's administration. The new buildings will not block surrounding public views along Haun Road or as future land uses are introduced around the Project site. The area just north of the site is also planned for the Holland Road Overpass over the freeway which will change views of the area as well. This Project site is not considered to be within or to comprise a portion of a scenic vista. Development of the self-storage site with the proposed additional buildings, parking areas, landscaping, and drainage improvements will have no effect on a scenic vista. Therefore, the proposed Project will not result in any impacts to a view of a scenic vista and no mitigation is required.

Except as provided in Public Resources Code Section 21099, would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X

No Impact

There are no officially designated scenic highways in or near this portion of the City. State Route 74 (SR-74) passes through the northern part of the City and is considered an "Eligible State Scenic Highway – Not Officially Designated" by the California Department of Transportation. The nearest designated state scenic highway to the City is a portion of SR-74 in the San Jacinto Mountains about 20 miles east of the City.

The proposed Project site is located within a rural largely vacant portion of the City west of the I-215 Freeway along Haun Road. This area is slowly suburbanizing with several subdivisions further to the west and northwest (north of Holland Road) and commercial uses north of the site along Newport Road and Haun Road, including the City Hall. The Project site and surrounding areas, including Haun Road and the freeway, have public views of various mountains and foothills generally in all directions. The Project proposes low-scale commercial buildings similar to those already on the site except that the new Building 1, in the northern portion of the site, will be 3-story and house storage plus the facility's administration. The new buildings will not block surrounding public views along Haun Road or as future land uses are introduced around the Project site. The area just north of the site is also planned for the Holland Road Overpass over the freeway which will change views of the area as well.

The Project site is currently developed with structures of the StaxUp Self-Storage Facility. Prior to the facility's construction, the Project site was a low intensity agricultural area for much of the 20th century. The Project site contains a number of shrubs and mature trees associated with the existing commercial use.

The site is already developed and there are no rock outcroppings or other visual resources present onsite. According to the *GPEIR*, implementation of the proposed General Plan would not result in damage to any significant rock outcroppings within a state Scenic highway. The same conclusions would apply to the Project. In addition, the California Office of Historic Preservation (OHP) indicates there are no historic buildings on the Project site.

Therefore, no impacts to scenic resources within view from a state scenic highway will occur and no mitigation is required.

Except as provided in Public Resources Code Section 21099, would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 point). If			X	

the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?				

Less Than Significant Impact

According to Section 5.1.3 of the GPEIR (p. 5.1-10):

> "*Implementation of the proposed General Plan is not expected to degrade views of scenic resources in the City. At full General Plan buildout, development in many parts of the City would intensify urban development in currently undeveloped areas. Portions of the City that are currently vacant land or farmland would be developed with a mix of residential, commercial, industrial, and institutional uses.*"

The Project site is bordered on all sides by vacant, undeveloped land except for an outdoor truck yard just east of the site. In addition, unpermitted storage of large vehicles is currently located on the northern portion of the site which is the proposed location of Building 1 and one of the water quality basins. The Project site and surrounding area are all designated Economic Development Corridor (EDC) in the General Plan and all zoned Economic Development Corridor-Community Core (EDC-CC).

Construction of the proposed Project will result in short-term impacts to the existing visual character and quality of the area. Construction activities will require the use of equipment and storage of materials within the Project site. However, construction activities are temporary and will not result in any permanent visual impact.

The proposed Project will incrementally change the visual character of the Project site by adding three commercial structures and landscaping to the existing self-storage facility. It should also be noted that the approved Holland Road Overpass project (over the I-215 Freeway) will be located just north of the site which will be more visually intrusive into this area than the commercial buildings under the proposed Project.

The Project is consistent with the General Plan which anticipated commercial development of this scale and character at this location. All buildings will be consistent with City design and building height requirements and limitations. The proposed Project will change the visual character of the Project site by adding structures and landscaping, however, the development will blend with the general visual characteristics of the area as it continues to develop with suburban residential and commercial uses. As proposed, the Project will have less than significant impacts on the visual character of the site and its surroundings and will not conflict with applicable zoning and other regulations governing scenic quality. Impacts will be less than significant, and no mitigation is required.

Except as provided in Public Resources Code Section 21099, would the Project?	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			**X**	

Less Than Significant Impact

Excessive or inappropriately directed lighting can adversely impact nighttime views by reducing the ability to see the night sky and stars. Glare can be caused from unshielded or misdirected lighting sources. Reflective surfaces (i.e., polished metal) can also cause glare. Impacts associated with glare range from simple nuisance to potentially dangerous situations (i.e., if glare is directed into the eyes of motorists).

Construction

Currently, the StaxUp Self-Storage Facility and the unpermitted storage of large vehicles have typical commercial lighting for their buildings and parking lots. There are also existing streetlights and vehicle headlights along Haun Road to the west and the I-215 Freeway to the east. There are no existing residences adjacent to the site but there are several residential subdivisions to the west and northwest north of Holland Road approximately a quarter mile from the Project site. It is anticipated that in the future the Holland Road Overpass will be visible just north of the Project site.

The proposed self-storage facility expansion will require additional temporary sources of light and glare during construction activities. These additional artificial light sources are typically associated with security lighting since all exterior construction activities are limited to daylight hours in the City. Workers either arriving to the site before dawn, or leaving the site after dusk, will generate additional construction light sources. These impacts will be temporary, of short-duration, and will cease when Project construction is completed. For these reasons, and because there are limited numbers of construction workers, these impacts are considered less than significant.

Operations

There are existing lighting sources currently on and adjacent to the Project site including light fixtures on buildings, vehicle headlights, traffic lights and streetlights. The proposed Project will require additional outdoor lighting associated with operation of the expanded self-storage facilities, both for parking areas and new buildings. The City Municipal Code requires that lighting associated with new development not be directed towards any of the surrounding uses. The Site Plan and Google Earth indicate there are no adjacent residential uses and only one commercial use adjacent to the east. The area is relatively dark due to its somewhat rural location, so the Project is not expected to substantially increase ambient lighting levels in the area. Therefore, new light sources on the site are not expected to negatively impact existing or future uses in the surrounding area.

Chapter 6.01 of the Menifee Municipal Code (Dark Sky; Light Pollution) indicates that low-pressure sodium lamps are the preferred illuminating source, and all non-exempt outdoor light fixtures shall be shielded. A maximum of 8,100 total lumens per acre or parcel if less than one acre shall be allowed. When lighting is “allowed”, it must be fully shielded if feasible and partially shielded in all other cases and must be focused to minimize spill light into the night sky and onto adjacent properties (Section 6.01.040). The Project will be conditioned that, prior to the issuance of building permits, all new construction which introduces light sources be required to have shielding or other light pollution-limiting characteristics such as hood or lumen restrictions. This is a standard condition and is not considered unique mitigation under CEQA.

The General Plan Community Design Element includes goals that encourage attractive landscaping, lighting, and signage that conveys a positive image of the community (Goal CD-6) and that limit light leakage and spillage that may interfere with the operations of the Palomar Observatory (Goal CD-6.5). The Project site is located approximately 52

miles from the Mt. Palomar Observatory. Lighting proposed by the Project complies with Menifee Municipal Code Section 6.01 and General Plan goals. Accordingly, the Project will have a less than significant impact on interfering with the nighttime use of the Mt. Palomar Observatory.

According to Section 5.1.3 of the *GPEIR* (p. 5.1-13):

> "*Additionally, all future development projects that would be accommodated by the proposed General Plan would be required to comply with California's Building Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6, of the California Code of Regulations), which outlines mandatory provisions for lighting control devices and luminaires.*
>
> *Adherence to County and City regulations and implementation of the policies of the proposed General Plan would ensure that light and glare from new development and redevelopment projects accommodated by the General Plan would be minimized and that significant impacts would not occur*."

The same requirements would apply to the Project, therefore, the same conclusions reached in the *GPEIR* would apply to the Project. The Project will not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Any impacts will be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

2. AGRICULTURE AND FORESTRY RESOURCES.

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Source(s): *GPEIR* (Chapter 5.2, *Agriculture and Forestry Resources*); *Map My County* (**Appendix A**); *General Plan*; Public Resources Code Section 12220(g); City of Menifee Zoning Map; and City of Menifee Municipal Code.

Applicable General Plan Policies:

N/A

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				**X**

No Impact

The California Department of Conservation's (CDC) Farmland Mapping and Monitoring Program (FMMP) was established in 1982 to track changes in agricultural land use and to help preserve areas of Important Farmland. It divides the state's land into eight categories based on soil quality and existing agricultural uses to produce maps and statistical data. These are used to help preserve productive farmland and to analyze impacts on farmland. Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance are all Important Farmland and are collectively referred to as Important Farmland in this DEIR. The highest rated Important Farmland is Prime Farmland. Farmland maps are updated and released every two years. The Project site has the farmland designations of Local Importance and Other Lands. Therefore, there are no lands designated as Prime Farmland, Unique Farmland or Farmland of Statewide Importance that would be affected by this Project.

The existing zoning on the site is Economic Development Corridor – Community Core (EDC-CC), which prescribes commercial uses. The zoning classification was anticipated and analyzed in the *GPEIR*.

The City is focusing on developing land in an economically productive way that will serve the growing population. Thus, Menifee's future development emphasizes mixed-use, commercial, industrial, and residential projects rather than supporting the continuation of agricultural uses,

which are becoming less economically viable. The commercial Project will serve the growing population. No impacts will occur.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				**X**

No Impact

No Williamson Act contracts are active for the proposed Project site. Therefore, the Project will not conflict with a Williamson Act contract. No impacts will occur.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined in Government Code section 51104(g))?				**X**

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, managed, or used as forest land as identified in Public Resources Code Section 12220(g). No impacts will occur.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?				**X**

No Impact

As discussed in Threshold 2.b, there is no forest land on the Project site. Therefore, there will be no loss of forest land or conversion of forest land to non-forest use as a result of the Project. No impacts will occur.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?			X	

Less Than Significant Impact

The proposed Project is commercial in nature, the Project site is currently zoned for commercial uses, and the site is bounded on the north by the Auto Overlay (AO) of the Economic Development Corridor – Commercial Core (EDC-CC), on the south, west, and east by land zoned EDC-CC.

The City is focusing on developing land in an economically productive way that will serve the growing population. Thus, Menifee's future development emphasizes mixed-use, commercial, industrial, and residential projects rather than supporting the continuation of agricultural uses, which are becoming less economically viable. Therefore, impacts to Farmland will be less than significant.

There is no forest land on the Project site. Therefore, the Project will not involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use. No impact will occur.

Mitigation Measures

No mitigation measures are required.

3. AIR QUALITY.

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Source(s): *General Plan*; *StaxUp Storage Expansion Project Air Quality, Greenhouse Gas, and Energy Analysis Technical Memorandum*[1], prepared by KW Air Quality & Noise, LLC, 7-29-2022 (*AQ/GHG Analysis*, **Appendix B1**); StaxUp Storage Expansion Project Air Quality/Greenhouse Gas Letter Memorandum[1], prepared by KW Air Quality & Noise, LLC, 11-21-2022 (*AQ/GHG Memo*, **Appendix B2**); and *StaxUP Storage Expansion Project Trip Generation & Vehicle Miles Traveled (VMT) Study, City of Menifee,* prepared by RK Engineering Group, Inc., 5-31-2022 (*VMT Memo*, **Appendix F**).

Applicable General Plan Policies:

- **Goal OSC-9:** Reduced impacts to air quality at the local level by minimizing pollution and particulate matter.
- **Policy OSC-9.1:** Meet state and federal clean air standards by minimizing particulate matter emissions from construction activities.
- **Policy OSC-9.2:** Buffer sensitive land uses, such as residences, schools, care facilities, and recreation areas from major air pollutant emission sources, including freeways, manufacturing, hazardous materials storage, wastewater treatment, and similar uses.
- **Policy OSC-9.3:** Comply with regional, state, and federal standards and programs for control of all airborne pollutants and noxious odors, regardless of source.
- **Policy OSC-9.5:** Comply with the mandatory requirements of Title 24 Part 11 of the California Building Standards Code (CALGreen) and Title 24 Part 6 Building and Energy Efficiency Standards.

Analysis of Project Effect and Determination of Significance:

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

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?			**X**	

Less Than Significant Impact

The Project site is within the South Coast Air Basin (Basin) and air quality within the Basin in monitored and managed by the South Coast Air Quality Management Agency (SCAQMD). The management of air quality in the Basin is outlined in the Air Quality Management Plan (AQMP) which describes air pollution control strategies to be taken by lead agencies located within region classified as a nonattainment area. The main purpose of an AQMP is to bring

[1] It should be noted the AQ/GHG Analysis was prepared in July 2022 based on a total of 43,125 square feet of new building area while the current Project proposes 36,640 total square feet of new building. The November *AQ/GHG Memo* documents that this reduction in square footage would actually result in a 15% decrease in potential operational air pollutant emissions but the estimates from the July *AQ/GHG Analysis* are cited in this section as representative "worst case" conditions which will not be exceeded by the current Project.

the area into compliance with Federal and State air quality standards. While the SCAQMD is currently working on the 2022 AQMP, CEQA requires that development projects be analyzed for consistency with the most current adopted AQMP (2016).

The SCAQMD CEQA Handbook states that "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 plan is usually not required. A proposed project should be considered to be 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.

Both of these criteria are evaluated in the following sections.

Criterion 1 - Increase in the Frequency or Severity of Violations

Based on the air quality modeling analysis contained in the *AQ/GHG Analysis*, the short-term construction impacts will not result in significant impacts based on the SCAQMD regional and local thresholds of significance. This analysis also found that long-term operations impacts will not result in significant impacts based on the SCAQMD regional thresholds of significance. Further documentation of these impacts is presented in Threshold 3.b below.

Therefore, the proposed Project does not contribute to the exceedance of any air pollutant concentration standards 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 2020-2045 Regional Transportation/Sustainable Communities Strategy, prepared by SCAG, 2020, includes chapters on: the 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. For this project, the City Land Use Plan defines the assumptions that are represented in the AQMP. The general plan land use designation for the site is. The Project proposes an expansion of an existing mini-storage facility that includes: one (1) three-story, 31,040 square foot (SF) building and two (2) one-story, 2,800 SF buildings within the existing development area (approximately one acre of the existing site on 8.4 gross acres. The Project also includes approximately 15,170 SF of landscaped area (inclusive of two water quality basins) positioned between the three-story building and the recently approved but yet to be constructed frontage road as part of the future Holland Road Overpass project. This self-storage use already exists on the site and the Project would expand the existing use which is consistent with the uses allowed on this site by the General Plan and zoning.

The proposed Project would be consistent with the General Plan land use designation for this site and would therefore not result in an inconsistency with the City's General Plan. Therefore, the proposed Project does not exceed the AQMP assumptions for the Project site and is found to be consistent with the AQMP for the second criterion.

Based on the above, the proposed project would not conflict with the implementation of the SCAQMD 2016 AQMP. Therefore, impacts are considered to be less than significant, and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			**X**	

Less Than Significant Impact

The proposed Project is the development of a total of 36,640 square feet of new building which will occupy approximately one (1) acre of the existing site on 8.4 gross acres. The storage expansion Project is anticipated to be built out in one phase with construction anticipated to begin no sooner than March 2023 and be completed by the end of 2023. The Project is anticipated to be operational late 2023 or early 2024; therefore, to be conservative, the Project was modeled as being operational in 2023. Even if construction was to occur any time after the respective dates, the analysis represents "worst-case" since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.

The Project will generate air pollutants during both construction (short-term impacts) and occupancy (long-term and cumulative impacts). The California Emissions Estimator Model Version 2022.1 (CalEEMod) was used to calculate criteria air pollutants from the Project. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify criteria air pollutant emissions. The model quantifies direct emissions from construction and operation activities (including vehicle use), as well as indirect emissions, such as emissions from off-site energy generation, solid waste disposal, vegetation planting and/or removal, and water use. The model also helps identify mitigation measures to reduce criteria pollutant emissions. The model was developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the California air districts.

Regional Construction Impacts

Construction activities associated with the Project will result in emissions of carbon monoxide (CO), volatile organic compounds (VOCs), nitrogen oxides (NO_x), sulfur oxides (SO_x), large particulate matter – 10 micrometers or less (PM_{10}), and small particulate matter – 2.5 micrometers or less ($PM_{2.5}$). Construction related emissions are expected from the following construction activities:

- Site Preparation;
- Grading;
- Building Construction;

- Paving;
- Architectural Coating; and
- Construction Workers Commuting.

The construction-related maximum criteria pollutant emissions for the construction of the proposed residential project are shown below in **Table 3-1, *Regional Construction Impacts***, which demonstrates that none of the analyzed criteria pollutants would exceed the SCAQMD's regional emissions thresholds. However, it should be noted the City will require the Project to comply with standard conditions of approval regarding applicable SCAQMD Rules such as Rule 403 which limits fugitive dust (e.g., watering the site twice a day) and Rule 1113 which limits architectural coatings applied to buildings to 50g/L VOC content. These conditions are considered regulatory compliance and not unique mitigation under CEQA. Therefore, regional air quality impacts from Project construction would be less than significant and no mitigation is required.

Table 3-1
Regional Construction Emissions

Maximum Daily Emissions (lbs./day)[1]						
Construction Activity	**VOC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Maximum[1]	13.50	17.60	20.50	0.03	3.73	2.14
SCAQMD Threshold	75	100	550	150	150	55
Exceeds Threshold (?)	No	No	No	No	No	No

[1] On-site emissions from equipment operated on-site that is not operated on public roads. On-site grading PM-10 and PM-2.5 emissions include watering twice a day for compliance with SCAQMD Rule 403 fugitive dust. Paving and painting phase may overlap with construction phase.

Regional Operational Emissions

Occupancy or operational activities associated with the proposed Project will result in emissions of VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$. The operating emissions were based on the year 2023, which is the anticipated opening year for the proposed Project. Operational emissions would be expected from the following primary sources:

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

Mobile sources include emissions from the additional vehicle miles generated from the proposed project. The trip generation rates are based on the Institute of Transportation Engineers (ITE) Trip Generation Manual 10th Edition (2017) for "unrefrigerated warehouse-no rail" and "parking lot" which is 1.45 trips per thousand square feet (TSF) per the *VMT Memo*. The program then applied the emission factors for each trip provided by the most current Emission Factor (EMFAC2021) model to determine the vehicular traffic pollutant emissions. Area sources include emissions from hearths, consumer products, landscape equipment and architectural coatings. Energy usage includes emissions from the generation of electricity and natural gas used on-site. No changes were made to the default energy usage parameters.

The worst-case summer or winter VOC, NO_x, CO, SO_2, PM_{10}, and $PM_{2.5}$ emissions

generated by the proposed Project's long-term operations have been calculated and are summarized below in **Table 3-2, *Regional Operational Emissions***, which shows that none of the analyzed criteria pollutants would exceed the regional emissions thresholds. Therefore, the long-term regional air quality impacts of proposed Project occupancy or operation would be less than significant, and no mitigation is required.

Table 3-2
Regional Operational Emissions

Maximum Daily Emissions (lbs./day)[1]						
Activity	**VOC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Total	1.45	0.69	5.84	0.01	0.28	0.07
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold (?)	No	No	No	No	No	No

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

Would the Project?	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
c) Expose sensitive receptors to substantial pollutant concentrations?			**X**	

Less Than Significant Impact

Overview

Sensitive receptors are considered land uses or other types of population groups that are more sensitive to air pollution exposure. Sensitive population groups include children, the elderly, the acutely and chronically ill, and those with cardio-respiratory diseases. For CEQA purposes, the SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24-hours or longer, such as residencies, hospitals, and schools (etc.).

Construction-related air emissions 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 South Coast Air Basin. The proposed Project has been analyzed for the potential local air quality impacts created from construction-related fugitive dust and construction equipment/vehicle emissions.

As part of the SCAQMD's environmental justice program, attention has been focused on the more localized effects of air quality on sensitive receptors instead of regional impacts on the Basin-wide population. To this end the SCAQMD developed localized significance thresholds (LSTs) methodology that can be used by public agencies to determine whether or not a project may generate significant adverse localized air quality impacts (both short- and long-term) to sensitive receptors. SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours, such as residences, hospitals, or convalescent facilities. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the state ambient air quality standard

and are developed based on the ambient concentrations of that pollutant for each source receptor area (SRA). The Project is located in SRA 24 – Perris Valley.

Localized Construction Emissions

Localized air quality emissions are analyzed using the SCAQMD's Mass Rate Localized Significant Threshold (LST) Look-up Tables which are 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. To be conservative a disturbance area of one (1) acre per day was used for comparison to SCAQMD LSTs.

The nearest sensitive receptors are an existing single-family residential dwelling unit approximately 305 feet or 92 meters to the southwest of the construction activity area and the single-family residential uses located approximately 590 feet or 179 meters to the northwest of the construction area, north of Holland Road and west of Haun Road. Therefore, the LST Look-Up Table for 50 meters was used. As shown in **Table 3-3, *Localized Construction Emissions***, none of the analyzed criteria pollutants would exceed the local emissions thresholds at the nearest sensitive receptor. Therefore, construction of the Project would have less than significant localized air quality impacts and no mitigation is required.

Table 3-3
Localized Construction Emissions

Maximum Daily Emissions (lbs./day)[1]				
Construction Activity	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**
Site Preparation	15.10	13.70	3.16	1.83
Grading	17.50	16.30	3.59	2.11
Building Construction	9.81	10.20	0.41	0.38
Paving	5.09	6.53	0.25	0.23
Architectural Coatings	0.93	1.15	0.04	0.03
Maximum[2]	**17.50**	16.30	3.59	2.11
SCAQMD LST Construction Threshold[2]	148	887	12	4
Exceeds Threshold (?)	No	No	No	No

[1] Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for one (1) acre at a distance of 50 meters in SRA 24 Perris Valley.

[2] The nearest sensitive receptors to the Project include: a single-family residence 305 feet to the southwest and a residential subdivision 509 feet to the northwest of the proposed Project site.

Localized Operational Emissions

According to SCAQMD LST methodology, LSTs could apply to the operational phase of a project if it included stationary sources (e.g., flares and turbines) and/or on-site mobile equipment or attracts mobile sources that may spend long periods of time idling at the site, such as warehouse/transfer facilities. However, the proposed Project is residential and does

not include such uses. Due to the lack of stationary source emissions or on-site heavy-duty mobile equipment, the SCAQMD LST methodology indicates that no long-term LST analysis for this self-storage expansion Project is needed. There would be no impacts in this regard and no mitigation is required.

Health Risks from Toxic Air Contaminants

Toxic Air Contaminants (TACs) are often associated with heavy industrial projects or projects that use a large number of diesel trucks (e.g., warehouses). The proposed Project is an expansion of an existing self-storage facility which is not a use or facility that would generate substantial amounts of TACs or represent any significant health risks to residents in the surrounding area. Therefore, there would be no impacts in this regard and no mitigation is required.

Naturally Occurring Asbestos

The Project is located in Riverside County, CA, which is not among the California counties that are found to have serpentine and ultramafic rock in their soils. Therefore, the potential risk for naturally occurring asbestos during Project construction is small. In the unlikely event asbestos is found on the site, the Project will be required to comply with the National Emissions Standards for Hazardous Air Pollutants (NESHAP) Asbestos Program. An Asbestos NESHAP Notification Form shall be completed and submitted to the California Air Resources Board immediately upon discovery of the contaminant. The Project will be required to follow NESHAP standards for emissions control during site renovation, waste transport and waste disposal. A person or firm certified in asbestos removal procedures will be required to supervise on-site activities. By following the required asbestos abatement protocols, the Project impact is less than significant. These regulatory compliance protocols are not considered unique mitigation under CEQA.

Carbon Monoxide "Hot Spots"

The significance of localized Carbon Monoxide (CO) impacts depends on whether ambient CO levels in the vicinity of the Project are above or below federal or state standards. If ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of the AAQS. If ambient levels already exceed State or federal standards, project emissions are considered significant if they increase 1-hour CO concentrations by 1.0 ppm or more or 8-hour CO concentrations by 0.45 ppm or more.

Current CO levels in the SCAB are in attainment of both federal and state standards, and local air quality monitoring data indicates there have not been any localized exceedances of CO over the past three years. Therefore, the Project must not contribute to an exceedance of a federal or state ambient air quality standard.

A CO hot spot is a localized concentration of carbon monoxide 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 and not traffic congestion and the 2003

SCAQMD AQMP found that, at four of the busiest intersections in Los Angeles, there were no CO hot spots concentrations.

Additionally, based on the results of the traffic study prepared for the City's General Plan Circulation Element, all nearby intersections were shown to operate at level of service D or better so traffic in the Project area would not significantly contribute to the formation of CO Hot Spots in the project vicinity. A project of this size would not generate a significant amount of new traffic so the Project's contributions to CO Hot Spots impacts would be less than significant.

For the reasons outlined above, the Project will not expose sensitive receptors to substantial pollutant concentrations. The Project must follow all SCAQMD rules and requirements with regards to fugitive dust control and architectural coatings which are included in the City's standard conditions of approval. Implementation of these conditions is considered regulatory compliance and not unique mitigation under CEQA. Therefore, localized impacts on sensitive receptors will be less than significant and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in other emissions (such as those leading to odors) affecting a substantial number of people?			**X**	

Less Than Significant Impact

Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are of short-term in nature and the odor emissions are expected to cease upon the drying or hardening of the odor producing materials. Due to the short-term nature and limited amounts of odor-producing materials being utilized, no significant impact related to odors would occur during construction of the proposed Project.

Diesel exhaust and VOCs would be emitted during construction of the Project and their odors are objectionable to some; however, emissions would disperse rapidly from the Project site and therefore should not reach objectionable levels at the nearest sensitive receptors. Short-term impacts would be less than significant, and no mitigation is required.

Potential sources that may emit odors during the on-going operations or occupancy of the proposed Project would include odor emissions from the vehicular and equipment emissions, and trash storage areas. The Project will be required to comply with City regulations regarding odor control. Furthermore, due to the distance of the nearest receptors from the Project site and through compliance with SCAQMD's Rule 402 (i.e., over 300 feet), no significant impact related to odors are anticipated to occur during the on-going operations (i.e., occupancy) of the proposed Project.

Considering the low intensity of potential odor and other emissions and the distance to the nearest sensitive receptors, the Project's construction and occupancy/operational activities would not result in other emissions (such as those leading to odors) affecting a substantial number of people. No other short- or long-term sources of objectionable odors or other emissions have been identified for the proposed Project. Any impacts will be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

4. BIOLOGICAL RESOURCES.

Source(s): *GPEIR* (Chapter 5.4, *Biological Resources*); *General Plan*; *Map My County* (**Appendix A**); **Figure 1, *Regional Location Map***, **Figure 2, *Vicinity Map***, and **Figure 6, *Aerial Photo***, all provided in Section I. of this Initial Study; Section 9.200.030 of the Menifee Municipal Code (Tree Preservation Regulations); *Holland/Interstate 215 Overcrossing Project, County of Riverside, Initial Study with Mitigated Negative Declaration SCH#2016041073,* prepared by the City of Menifee, 8-2016 (*Holland Road Overpass MND* **Appendix D**); Wetlands Mapper of the National Wetlands Inventory maintained by the USGS; USGS Website, topographic maps; and Western Riverside County Multiple Species Habitat Conservation Plan Interactive Maps.

Applicable General Plan Policies:

- **Goal OSC-8:** Protected biological resources, especially sensitive and special status wildlife species and their natural habitats.
- **Policy OSC-8.1:** Work to implement the Western Riverside County Multiple Species Habitat Conservation Plan in coordination with the Regional Conservation Authority.
- **Policy OSC-8.2:** Support local and regional efforts to evaluate, acquire, and protect natural habitats for sensitive, threatened, and endangered species occurring in and around the City.
- **Policy OSC-8.4:** Identify and inventory existing natural resources in the City of Menifee.
- **Policy OSC-8.5:** Recognize the impacts new development will have on the City's natural resources and identify ways to reduce these impacts.
- **Policy OSC-8.8:** Implement and follow MSHCP goals and policies when making discretionary actions pursuant to Section 13 of the Implementing Agreement.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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. Fish and Wildlife Service?			**X**	

Less Than Significant Impact

The Project site is relative flat and has an elevation of 1,465 feet above mean sea level (AMSL) in the north and 1,460 AMSL in the south. Most of the site is currently developed with structures related to the StaxUp Self Storage Facility. The site is covered with impervious surfaces except for an unimproved dirt parking area (the proposed Project area) in the north-central portion of the site. The site supports no native vegetation but does contain a few landscaped trees along the eastern margin of the commercial property.

Based on the final Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP adopted June 17, 2003), the Project site is not located within a Cell, a Cell

Group, or Sub-Unit of the Sun City/Menifee Valley Area Plan. In addition, the Project site is not located within or along the boundaries of Western Riverside County Regional Conservation Agency (RCA) Conserved Lands or MSHCP Public/Quasi-Public Conserved Lands.

The specific location of the proposed Project is completely developed/disturbed so no biological resources study was conducted on the property. There is no visible evidence of natural drainage features, vernal pools, or other wetland features on the portion of the site planned for Project construction. However, historical aerial photographs indicate a blue line stream was located just west and north of the Project site that continued north along the west side of the I-15 alignment (see below). At present, there is no evidence on the Project site of standing water or other sign of areas that pond water (e.g., depressions, mud cracks, tire ruts, drainages, etc.), and there are no features present within the Project development footprint that would support fairy shrimp or other plant or animal species typical of vernal pools.

There are no water-related features on the portion of the Project site planned for development. However, there is an improved detention basin in the far west portion of the site that contains a flood control basin. This basin is part of a historical drainage feature that was located just west of the Project site and flowed toward the north. The historical track or trace of the channel appears on the National Wetlands Inventory (NWI, see Threshold 4.b below). This feature appears to be ephemeral but a remnant of it is shown in the NWI near the northwest corner of the site. This feature contains water only immediately after storm events and supports no resources identified or protected by the MSHCP. In addition, impacts to this drainage feature were already addressed in the *Holland Road Overpass MND* which recommended three mitigation measures (BIO-13 through BIO-15) to reduce potential impacts on this drainage to less than significant levels. Therefore, the proposed self-storage project does not need to provide any additional mitigation relative to this drainage.

The surrounding area has been dry farmed for many years and so also do not support native vegetation or other demonstrable biological resources. The surface of the agricultural fields consists of loose and unconsolidated sandy loam soils. During the winter and spring when the surrounding agricultural areas are prepared for dry crop farming, discing makes it difficult to walk in most areas without sinking deep into the sandy loams and impossible to walk in other areas. This kind of soil texture has a high percolation rate because the sandy loams do not retain and pond water. As the dry crop begins to grow, the sandy loams are still not able to retain and pond water to provide suitable fairy shrimp habitat.

Other than the historical ephemeral drainage described above, there are no perennial or seasonal aquatic features that could be classified as federally protected wetlands as defined by Section 404 of the Clean Water Act are also not present on the Project site (e.g., rivers, open waters, swamps, marshes, bogs, fens, etc.) or in the immediate surrounding area.

The site has been completely and regularly disturbed for many years and has experienced regular human activity. Due to the level of disturbance, no surveys for any listed or otherwise sensitive plant or animal species are necessary. However, the City will require the following standard Condition of Approval (COA) for a pre-construction survey for burrowing owl since that species can quickly inhabit vacant land.

COA - Burrowing Owl Preconstruction Survey. Pursuant to Objective 6 and Objective 7 of the Species Account for the Burrowing Owl included in the Western Riverside County Multiple Species Habitat Conservation Plan, within 30 days prior to the issuance of a grading permit, a pre-construction presence/absence survey for the burrowing owl shall be conducted by a qualified biologist and the results of this presence/absence survey shall be provided in writing to the City of Menifee Community Development Department. If it is determined that the project site is occupied by the Burrowing Owl, take of "active" nests shall be avoided pursuant to the MSHCP and the Migratory Bird Treaty Act. However, when the Burrowing Owl is present, relocation outside of the nesting season (March 1 through August 31) by a qualified biologist shall be required. The City shall be consulted to determine appropriate type of relocation (active or passive) and translocation sites. Occupation of this species on the project site may result in the need to revise grading plans so that take of "active" nests is avoided or alternatively, a grading permit may be issued once the species has been actively relocated.

If the grading permit is not obtained within 30 days of the survey a new survey shall be required.

If construction and/or disturbance of the site is suspended for a period of days (30) days or more, a new survey shall be required.

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 Project site, and areas in the immediate vicinity of the Project contains trees, shrubs, and grasslands that provide suitable nesting habitat for a number of bird species known to nest in the Project area. Given the level of ongoing disturbance to the site, the only species that could utilize the site would be song or passerine birds in the large trees onsite, although raptors also may occasionally utilize the tress for perching as there are vacant agricultural fields adjacent to the east, north, and west. Therefore, the City requires the following Standard Condition of Approval (COA) requiring a nesting bird survey be conducted prior to grading permit issuance.

COA - Nesting Bird Survey. Birds and their nests are protected by the Migratory Bird Treaty Act (MBTA) and California Department of Fish and Wildlife (CDFW) Codes. Since the project supports suitable nesting bird habitat, removal of vegetation or any other potential nesting bird habitat disturbances, shall be conducted outside of the avian nesting season (February 1st through August 31st). If habitat must be cleared during the nesting season, a preconstruction nesting bird survey shall be conducted. The preconstruction nesting bird survey must be conducted by a biologist who holds a current MOU with the City of Menifee. Surveys shall cover all potential nesting habitat areas that could be disturbed by each phase of construction. Surveys shall also include areas within 500 feet of the boundaries of the active construction areas. The biologist shall prepare and submit a report, documenting the results of the survey, to the City of Menifee Community Development Department for review and approval. If nesting activity is observed, appropriate avoidance measures shall be adopted to avoid any potential impacts to nesting birds.

Lastly, the Project construction footprint does not contain vernal pools or riparian habitat and would not affect any resources under the jurisdiction of the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, or U.S. Fish and Wildlife Service, and the former blue line stream alignment west and north of the site also do not contain

any indications of these resources. Therefore, no mitigation is required, and no subsequent jurisdictional permitting is needed.

Based on available information, 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. Fish and Wildlife Service. Impacts will be less than significant with incorporation of the required COA, and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?			**X**	

Less Than Significant Impact

The Project site is fully developed with impervious and pervious surfaces and contains no native vegetation or significant biological resources covered by the MSHCP (see Threshold 4.a). There is an improved detention basin just west of the site for area flood control purposes. This basin is part of an historical drainage feature that was located just west of the Project site and flowed toward the northeast and north. The historical track or trace of the channel appears on the National Wetlands Inventory (NWI) showing surface waters past and present. This feature also appears on older historical U.S. Geological Survey (USGS) aerial photos up until the early 2000's. This feature is now ephemeral although a remnant of it is shown in the NWI as crossing the northwest corner of the site.

In addition, the USGS Romoland 7.5-minute series topo map shows a portion of this swale adjacent to the Project site, as a "blue line" stream. At present this feature is little more than an unnamed drainage swale with no identified bed or bank and contains water only immediately after storm events. It supports no resources identified or protected by the MSHCP.

The Project plans show the placement of a runoff inlet structure at the northwest corner of the site that would convey runoff that now runs across the roadway during storm events under the roadway and would discharge into the existing swale north and northeast of the Project site. However, impacts to this drainage feature have already been addressed in the *Holland Road Overpass MND* which recommended three mitigation measures (BIO-13 through BIO-15) including jurisdictional permitting to reduce potential impacts on this drainage to less than significant levels. Therefore, the proposed self-storage Project does not need to provide any additional mitigation relative to this drainage.

As discussed in Threshold 4.a, there is no visible evidence of natural permanent drainage features, impoundments, vernal pools, or other wetland features on Project site now or in the recent past, based on site reconnaissance and a review of historical aerial photographs. There are no other kinds of perennial or seasonal aquatic features that

could be classified as federally protected wetlands as defined by Section 404 of the Clean Water Act present on the Project site (e.g., rivers, open waters, swamps, marshes, bogs, fens, etc.). As a result, there is also no riparian vegetation or other sensitive habitat either on or adjacent to the site.

Therefore, implementation of 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, regulations or by the California Department of Fish and Wildlife (CDFW) or U. S. Fish and Wildlife Service (USFWS). Therefore, impacts will be less than significant, and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) 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?				**X**

No Impact

The U.S. Army Corps of Engineers (USACE), under Section 404 of the Federal Clean Water Act (CWA), regulates discharges of dredged or fill material into "waters of the United States." These waters include wetlands and non-wetland bodies of water that meet specific criteria, including a connection to interstate or foreign commerce. This connection may be direct (through a tributary system linking a stream channel with traditional navigable waters used in interstate or foreign commerce) or it may be indirect (through a connection identified in USACE regulations). The USACE typically regulates as non-wetland waters of the U.S. any body of water displaying an ordinary high-water mark. In order to be considered a jurisdictional wetland under Section 404, an area must possess hydrophytic vegetation, hydric soils, and wetland hydrology.

The CDFW, under Sections 1600 et seq. of the California Fish and Game Code, regulates alterations to lakes, rivers, and streams. A stream is defined by the presence of a channel bed and banks, and at least an occasional flow of water. The CDFW also regulates habitat associated with the streambed, such as wetland, riparian shrub, and woodlands.

The Regional Water Quality Control Board (RWQCB) is responsible for the administration of Section 401 of the CWA, through water quality certification of any activity that may result in a discharge to jurisdictional waters of the U.S. The RWQCB may also regulate discharges to "waters of the State," including wetlands, under the California Porter-Cologne Water Quality Control Act.

As outlined in Threshold 4.b, a shallow ephemeral drainage swale is located just north of the Project site. There is also an improved detention basin associated with this drainage feature just west of the Project site. impacts to this drainage feature have already been addressed in the *Holland Road Overpass MND* which recommended three mitigation measures (BIO-13 through BIO-15) including jurisdictional permitting to reduce potential impacts on this drainage to less than significant levels. Therefore, the

proposed self-storage Project does not need to provide any additional mitigation relative to this drainage.

Based on available information, the Project site will not result in impacts to any natural water impoundment, vernal pool, or other wetland feature that has not already been addressed in a previous environmental document (i.e., *Holland Road Overpass MND*). In addition, there are no other such water-related features on the Project site based on site reconnaissance and a review of historical aerial photographs. Other kinds of perennial or seasonal aquatic features that could be classified as federally protected wetlands as defined by Section 404 of the Clean Water Act are also not present on the Project site (e.g., rivers, open waters, swamps, marshes, bogs, fens, etc.) or in the immediate surrounding area.

Therefore, implementation of 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.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			**X**	

Less than Significant Impact

As discussed previously, the Project construction footprint itself does not contain any drainage or water features, so it does not support any fish species. The remnant blue line stream channel west and north of the Project will not be impacted by construction or operation of the Project, so there will be no impacts to these areas as well. According to the MSHCP, the site also does not contain any wildlife movement corridors or nursery sites, nor does the immediate surrounding area.

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 make it unlawful to take, possess, or needlessly destroy the nest or eggs of any migratory bird or bird of prey. The Project site, and areas in the immediate vicinity of the Project 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 15 February to 31 August is the expected breeding season for bird species occurring in the Project area, including raptors. Under the required COA for Nesting Bird Survey, if Project activity or vegetation removal must be initiated during the breeding season, a qualified biologist must 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 the required COA, impacts to nesting birds will be less than significant, and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	

Less than Significant Impact

The Project site and immediate surrounding area contain a few trees or shrubs which may be impacted as a result of Project construction. To reduce any potential impacts from tree removal to a less than significant level, the Project shall comply with the Tree Preservation Regulations found in Section 9.200.030 of the Menifee Municipal Code.

Therefore, the proposed Project will comply with, and 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 Municipal Code Regulations, and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			X	

Less Than Significant Impact

According to the final Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP adopted June 17, 2003), the Project site is not located within a Cell, a Cell Group, or Sub Unit of the Sun City/Menifee Valley Area Plan. In addition, the Project site is not located within or along the boundaries of the Western Riverside County RCA Conserved Lands or MSHCP Public/Quasi-Public Conserved Lands. The discussion under Threshold 4.a, the proposed Project is consistent with all applicable requirements of the MSHCP and does not require any special studies.

The Project site is not located within an area that has been identified in the MSHCP where conservation potentially needs to occur. A Habitat Acquisition and Negotiation Strategy (HANS) Application will not be required by the City of Menifee Community Development Department pursuant to the MSHCP and the City's General Plan. Conservation has not been described for the Project site. The Project is consistent with Section 6.1.1 of the MSHCP. In addition, the Project site contains no drainage features, jurisdictional drainages, vernal pools, riparian/riverine areas, wetlands, ponds or other features that would fall under MSHCP Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools).

The site has been completely developed and disturbed for many years and there is no potential for listed or otherwise sensitive or protected plant species to be present. Therefore, the Project is consistent with MSHCP Section 6.1.3 (Protection of Narrow Endemic Plant Species) and is not located within a Narrow Endemic Plant Species Survey Area. The Project site is also not located at an Urban/Wildlands Interface, so MSHCP Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface) does not apply to this site.

The Project will implement standard measures to reduce the potential of adverse effects from drainage, toxics, etc. with the implementation of the SWPPP, and WQMP. These standard conditions are applicable to all development; therefore, they are not considered mitigation for CEQA implementation purposes.

Based on Figures 6-2 (Criteria Area Species Survey Areas), 6-3 (Amphibian Species Survey Areas), 6-4 (Burrowing Owl Survey Areas), and 6-5 (Mammal Species Survey Areas) of the MSHCP, the Project site is not located in an area where additional surveys are needed for certain species in conjunction with MSHCP implementation in order to achieve coverage for these species. Also, the Project site is not located in a Special Linkage Area.

As outlined in Section 6 of the MSHCP, "Payment of the mitigation fee and compliance with the requirements of Section 6.0 are intended to provide full mitigation under CEQA, the 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 Western Riverside County Multiple Species Habitat Conservation Plan Mitigation Fee has been established to provide mitigation for biological impacts from projects within the MSHCP area. All building permit applicants may pay their Western Riverside County MSHCP mitigation fees at any time after having an approved land development permit for the City of Menifee Planning Division (ex: conditional use permit, public use permit, plot plan) and have also paid for building permit plan review or permit fees. Payment of this fee is a standard condition and is not considered unique mitigation under CEQA.

The proposed Project is located within the boundary of the adopted Habitat Conservation Plan (HCP) for the endangered Stephens' kangaroo rat (SKR) implemented by the Riverside County Habitat Conservation Agency (RCHCA). The SKR HCP mitigates impacts from development on the SKR by establishing a network of preserves and a system for managing and monitoring them. The proposed Project is located within the SKR HCP area and will be required to comply with applicable provisions of this plan, specifically, payment of fees. Payment of this fee is a standard condition and is not considered unique mitigation under CEQA.

In conclusion, the proposed Project is consistent with all applicable sections of the MSHCP. Adherence to Standard Conditions COA for Nesting Bird Survey, Municipal Code Regulations, and the COA outlined below for Burrowing Owl Preconstruction Survey will ensure 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. Therefore, impacts are less than significant with adherence to the required COAs for burrowing owl and nesting bird survey, and Regulations, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

5. CULTURAL RESOURCES.

Source(s): *Map My County* (**Appendix A**); *Holland/Interstate 215 Overcrossing Project, County of Riverside, Initial Study with Mitigated Negative Declaration SCH#2016041073,* prepared by the City of Menifee, 8-2016 (*Holland Road Overpass MND* **Appendix D**); *Historical Resources Compliance Report, Holland Road/Interstate 215 Overcrossing Project, City of Menifee*, prepared by ICF International, 3-11-2015 (*Historical Report*, **Appendix I**); *Holland Road/Interstate 215 Overcrossing Project, Archaeological Survey Report, City of Menifee*, prepared by ICF International, 3-11-2015 (*Archaeo Report*, **Appendix I**); and City Staff.

Applicable General Plan Policies:

- **Goal OSC-5:** Archaeological, historical, and cultural resources that are protected and integrated into the City's built environment.
- **Policy OSC-5.1:** Preserve and protect significant archaeological, historic, and cultural sites, places, districts, structures, landforms, objects and native burial sites, and other features, such as Ringing Rock and Grandmother Oak, consistent with state law.
- **Policy OSC-5.3:** Preserve sacred sites identified by the Pechanga Band of Luiseño Indians and Soboba Band of Luiseno Indians, such as tribal burial grounds, by avoiding activities that would negatively impact the sites.
- **Policy OSC-5.5:** Establish clear and responsible practices to identify, evaluate, and protect previously unknown archaeological, historic, and cultural sites, following CEQA and NEPA procedure.

Please note that this Section primarily addresses historical, archaeological, and cultural resources not associated with tribal cultural resources. For a comprehensive discussion on tribal cultural resources, please refer to Section 18, Tribal Cultural Resources, of this Initial Study.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?				**X**

No Impact

From the late 1760's to 1848, California was under the control of Mexico. Three historical events then occurred in rapid succession, the end of the Mexican-American War in 1848 when California became part of the United State, the discovery of gold in 1849 which spurred huge immigration to the state, and achieving statehood in 1850. The first major population boom in southern California followed completion of the Southern Pacific Railroad connection from Sacramento and the transcontinental Central Pacific Railroad south to Los Angeles in 1874. The railroads brought land speculators, developers, and farmers to the Menifee region.

The Menifee area was largely used for sheep and cattle grazing prior to 1848, then mining began in the early 1880s with the discovery of a significant quartz lode by miner Luther Menifee Wilson, from which Menifee derived its name. Early suburban development of the Menifee area began with a retirement community called Sun City in the early 1960s. The area continued to grow during the late 1980s and into the early 1990s as suburban and semi-rural residential communities in unincorporated Riverside County, including the master-planned community of Menifee Lakes. On October 1, 2008, the City of Menifee was officially incorporated as Riverside County's 26th city. In addition, the former U.S. 395 was reconstructed through Menifee into the I-215 freeway which serves as an important transportation route through San Bernardino and Riverside Counties

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 following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c))

The Project site is already fully developed with storage buildings and asphalt drive aisles. None of the buildings or facilities on the Project site satisfy any of the criteria for a historic resource defined in Section 15064.5 of the State CEQA Guidelines. The Project site is also not listed with the State Office of Historic Preservation or the National Register of Historic Places. In addition, a *Historical Report* prepared for the Holland Road Overcrossing Project, which includes the proposed Project site, indicated that 22 previous cultural surveys have been conducted within a mile radius of the Holland Road Project, but no cultural sites have been recorded on the Holland Road site or the current Project site.

Therefore, the proposed Project will not cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5. No impacts will occur, and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?			X	

Less Than Significant Impact

The Menifee area has been inhabited by Native American tribes for almost 10,000 years. The Project area lies on the edge of the traditional cultural territory of the Cahuilla to the north and the Luiseño to the south. Both tribes are culturally related and belong to the Takic branch of the Shoshonean language family. Their lifestyles were based on hunting, collecting, and harvesting and they inhabited valleys, foothills, and mountain areas which provided them with a variety of food resources. These groups flourished throughout what is now known as western Riverside County up until first contact with the Spanish in the late 1760's.

First European contact was quickly followed by the establishment of Mission San Gabriel in 1771, Mission San Juan Capistrano in 1776, and Mission San Luis Rey in 1798. Mission San Luis Rey had a particularly profound effect on the local Native American population in the Project area, primarily the Luiseño who derive their name from this mission. During this forced colonization period, tribal members became increasingly sedentary, learned Spanish, were converted to Christianity, and provided the labor force for the missions and their ranchos. Mexico, including California, won independence from Spain in 1821. Secularization of the missions followed in 1834 with large land grants being given to individuals in the area. The first land grant in Riverside County was given in 1838 and the Project area was situated between two ranchos, Rancho Laguna (Stearns) to the west at Lake Elsinore, and Rancho San Jacinto Viejo situated to the east around San Jacinto. Early non-native settlement of began in the 1840s and lands were primarily used for cattle grazing which was a common practice during the California rancho era.

According to past reports from the Eastern Information Center, University of California, Riverside, the general Project area contains dozens of historical/archaeological sites, features, and isolates. A previous cultural assessment for the adjacent Holland Road Overcrossing from 2015 found 22 surveys had previously been conducted within a one-mile radius of the overcrossing project area which includes the proposed Project site (*Historical Report*), A review of the overcrossing report found no previously recorded sites within the overcrossing site or within the proposed Project site (*Holland Road Overpass MND*). However, the *Archaeo Report* prepared for the Holland Road Overcrossing Project found 12 cultural resource sites within the one-mile study area for the Holland Road project. The *Archaeo Report* indicated a prehistoric village complex, known as the Christensen-Webb Site but referred to by the Pechanga Tribe as *Táawila*, has been recorded within one mile of the overcrossing project and the current proposed Project as well. The site was documented by the San Diego Museum of Man in the 1920s and is considered a Tribal Cultural Resource (TCR) by the Pechanga Tribe based on past consultation conducted under AB 52. However, the prehistoric resources associated with *Táawila* will not be impacted by the proposed Project as the prehistoric resources are more than 0.25 mile away from the Project site. Finally, the Project site is fully

developed and covered with improved surfaces, so the City determined that an onsite cultural survey was unnecessary.

Based on available research, there is no evidence to suggest any potential "historical resources" or "tribal cultural resources" are located within or adjacent to the Project site. The Project site has experienced extensive and repeated disturbance over the years, including development of the commercial storage facility, parking lots, and a gravel parking area. This past disturbance did not reveal any shallow buried archaeological resources. However, in the event that archaeological materials are uncovered during ground-disturbing activities, the City requires the following Standard Conditions of Approval (COAs):

COA – Inadvertent Archaeological Finds. If during ground disturbance activities, unique cultural resources are discovered that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to project approval, the following procedures shall be followed. Unique cultural resources are defined, for this condition only, as being multiple artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to its sacred or cultural importance as determined in consultation with the Native American Tribe(s).

i. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer, the archaeologist, the tribal representative(s) and the Community Development Director to discuss the significance of the find.

ii. At the meeting, the significance of the discoveries shall be discussed and after consultation with the tribal representative(s) and the archaeologist, a decision shall be made, with the concurrence of the Community Development Director, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.

iii. Grading of further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional Tribal monitors if needed.

iv. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition.

v. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the project archaeologist, in consultation with the Tribe, and shall be submitted to the City for their review and approval prior to implementation of the said plan.

vi. Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the landowner and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the City Community Development Director for decision. The City Community Development Director shall make the determination based on the provisions of

the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archaeologist and shall take into account the cultural and religious principles and practices of the Tribe. Notwithstanding any other rights available under the law, the decision of the City Community Development Director shall be appealable to the City Planning Commission and/or City Council."

COA – Cultural Resources Disposition. In the event that Native American cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:

a) One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the City of Menifee Community Development Department:

i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources.

ii. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV report. The Phase IV Report shall be filed with the City under a confidential cover and not subject to Public Records Request.

iii. If preservation in place or reburial is not feasible then the resources shall be curated in a culturally appropriate manner at a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the City. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Phase IV monitoring report.

COA – Archaeologist Retained. Prior to issuance of a grading permit, the project applicant shall retain a Riverside County qualified archaeologist to monitor all ground disturbing activities in an effort to identify any unknown archaeological resources.

The Project Archaeologist and the Tribal monitor(s) shall manage and oversee monitoring for all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, structure demolition and etc. The Project Archaeologist and the Tribal monitor(s), shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources in coordination with any required special interest or tribal monitors.

The developer/permit holder shall submit a fully executed copy of the contract to the Community Development Department to ensure compliance with this condition of

approval. Upon verification, the Community Development Department shall clear this condition.

In addition, the Project Archaeologist, in consultation with the Consulting Tribe(s), the contractor, and the City, shall develop a Cultural Resources Management Plan (CRMP) in consultation pursuant to the definition in AB52 to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the project site. A consulting tribe is defined as a tribe that initiated the AB 52 tribal consultation process for the Project, has not opted out of the AB52 consultation process, and has completed AB 52 consultation with the City as provided for in Cal Pub Res Code Section 21080.3.2(b)(1) of AB52. Details in the Plan shall include:

a. Project grading and development scheduling;

b. The Project archaeologist and the Consulting Tribes(s) shall attend the pre-grading meeting with the City, the construction manager and any contractors and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The Training will include a brief review of the cultural sensitivity of the Project and the surrounding area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. All new construction personnel that will conduct earthwork or grading activities that begin work on the Project following the initial Training must take the Cultural Sensitivity Training prior to beginning work and the Project archaeologist and Consulting Tribe(s) shall make themselves available to provide the training on an as-needed basis;

c. The protocols and stipulations that the contractor, City, Consulting Tribe(s) and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation.

COA – Native American Monitoring (Pechanga). Tribal monitor(s) shall be required on-site during all ground-disturbing activities, including grading, stockpiling of materials, engineered fill, rock crushing, etc. The land divider/permit holder shall retain a qualified tribal monitor(s) from the Pechanga Band of Luiseno Indians. Prior to issuance of a grading permit, the developer shall submit a copy of a signed contract between the above-mentioned Tribe and the land divider/permit holder for the monitoring of the project to the Community Development Department and to the Engineering Department. The Tribal Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground-disturbance activities to allow recovery of cultural resources, in coordination with the Project Archaeologist.

COA – Archaeology Report - Phase III and IV. Prior to final inspection, the developer/permit holder shall prompt the Project Archaeologist to submit two (2) copies of the Phase III Data Recovery report (if required for the Project) and the Phase IV Cultural Resources Monitoring Report that complies with the Community Development Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Community Development Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Community Development Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies

shall be submitted to the Eastern Information Center (EIC) at the University of California Riverside (UCR) and one (1) copy shall be submitted to the Consulting Tribe(s) Cultural Resources Department(s).

Furthermore, General Plan policies are in place to preserve and protect archaeological and historic resources and cultural sites, places, districts, structures, landforms, objects and native burial sites, traditional cultural landscapes and other features, consistent with state law and any laws, regulations or policies which may be adopted by the City (OCS-5.1).

For these reasons, the Project will not cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5. With implementation of the City's Standard COAs, impacts will be less than significant, and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Disturb any human remains, including those interred outside of formal cemeteries?			X	

Less Than Significant Impact

Because the Project site has been previously disturbed, no human remains, or cemeteries, are anticipated to be disturbed by the proposed Project. However, these findings do not preclude the existence of previously unknown human remains located below the ground surface, which may be encountered during construction excavations associated with the proposed Project. It is also possible to encounter buried human remains during construction given the proven prehistoric occupation of the region, the identification of multiple surface archaeological resources within one mile of the Project site, and the favorable natural conditions that would have attracted prehistoric inhabitants to the area.

The following Standard COAs are applied to all projects to reduce potential impacts to previously unknown human remains that may be unexpectedly discovered during Project implementation to a less than significant level:

COA – Human Remains. If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. 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.

COA – Non-Disclosure of Location Reburials. It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human

remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code 6254(r), parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 6254(r).

These COAs are supported by Health and Safety Code § 7050.5. These COAs are considered regulatory compliance and not project-specific mitigation under CEQA. With compliance with the above-referenced state law and standard conditions, potential impacts related to the discovery of human remains will be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

6. ENERGY.

Source(s): *General Plan; GPEIR (*Chapter 5.17, *Utilities and Service Systems)*; *StaxUp Storage Expansion Project Air Quality, Greenhouse Gas, and Energy Analysis Technical Memorandum*[1], prepared by KW Air Quality & Noise, LLC, 7-29-2022 (*AQ/GHG Analysis*, **Appendix B1**); StaxUp Storage Expansion Project Air Quality/Greenhouse Gas Letter Memorandum[2], prepared by KW Air Quality & Noise, LLC, 11-21-2022 (*AQ/GHG Memo*, **Appendix B2**); and *StaxUP Storage Expansion Project Trip Generation & Vehicle Miles Traveled (VMT) Study, City of Menifee,* prepared by RK Engineering Group, Inc., 5-31-2022 (*VMT Memo*, **Appendix F**).

Applicable General Plan Policies:

- **Goal OSC-4:** Efficient and environmentally appropriate use and management of energy and mineral resources to ensure their availability for future generations.
- **Policy OSC-4.1:** Apply energy efficiency and conservation practices in land use, transportation demand management, and subdivision and building design.
- **Policy OSC-4.2:** Evaluate public and private efforts to develop and operate alternative systems of energy production, including solar, wind, and fuel cell.
- **Policy OSC-4.3:** Advocate for cost-effective and reliable production and delivery of electrical power to residents and businesses throughout the community.
- **Goal LU-3:** A full range of public utilities and related services that provide for the immediate and long-term needs of the community.
- **Policy LU-3.1:** Work with utility providers in the planning, designing, and siting of distribution and support facilities to comply with the standards of the General Plan and Development Code.
- **Policy LU-3.2:** Work with utility provides to increase service capacity as demand increases.
- **Policy LU-3.3:** Coordinate public infrastructure improvements through the City's Capital Improvement Program.
- **Policy LU-3.4:** Require that approval of new development be contingent upon the project's ability to secure appropriate infrastructure services.
- **Policy LU-3.5:** Facilitate the shared use of right-of-way, transmission corridors, and other appropriate measures to minimize the visual impact of utilities infrastructure throughout Menifee.

Analysis of Project Effect and Determination of Significance:

[2] It should be noted the AQ/GHG Analysis was prepared in July 2022 based on a total of 43,125 square feet of new building area while the current Project proposes 36,640 square feet of new building. The November *AQ/GHG Memo* documents that this reduction in square footage would actually result in a 15% decrease in potential operational air pollutant emissions but the estimates from the July *AQ/GHG Analysis* are cited in this section as representative "worst case" conditions which will not be exceeded by the current Project.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	

Less Than Significant Impact

Overview

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.

According to the EIA, 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 was calculated as part of the *AQ/GHG Analysis*. The California Emissions Estimator Model Version 2022.1 (CalEEMod) was used to calculate energy usage from Project construction and operational activities.

Construction Impacts

The Project would utilize construction contractors which practice compliance with applicable California Air Resources Board (CARB) regulation regarding retrofitting, repowering, or

replacement of diesel off-road construction equipment. Additionally, CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants (TACs). Compliance with these measures would result in a more efficient use of construction- related energy and would minimize or eliminate wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption. Enforcement of idling limitations is realized through periodic site inspections conducted by County building officials, and/or in response to citizen complaints.

Operational Impacts

Energy consumption in support of or related to Project operations would include transportation energy demands such as the energy consumed by employee and patron vehicles accessing the project site, and facilities energy demands such as the energy consumed by building operations and site maintenance activities.

The Project *VMT Memo* concludes the Project would generate 336,095 annual vehicle miles traveled (VMT). Trip generation and VMT generated by the proposed Project are consistent with other similar mini-storage facility uses of similar scale and configuration as reflected in the *VMT Memo*. The Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and VMT, nor result in excessive or wasteful vehicle energy consumption. Furthermore, the state of California consumed approximately 4.2 billion gallons of diesel and 15.1 billion gallons of gasoline in 2015.[4,5] Therefore, the increase in fuel consumption from the proposed Project is insignificant in comparison to the State's demand. Therefore, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Building operation and site maintenance (including landscape maintenance) would result in the consumption of electricity which is provided by Southern California Edison and natural gas which is provided by Southern California Gas Company. The annual natural gas and electricity demands are provided per the CalEEMod output. The estimated natural gas consumption for the proposed Project is approximately 930,782 kBTU per year. The estimated electricity consumption for the proposed Project is approximately 226,091 kWh per year.

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building such as in plug-in appliances. In California, the state Building Standards Code Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting. Non-building energy use, or "plug-in" energy use can be further subdivided by specific end-use (refrigeration, cooking, appliances, etc.). The proposed Project would be required to comply with Title 24 standards.

Furthermore, the *AQ/GHG Analysis* concluded the proposed Project's total energy demands would be comparable to other non- residential projects of similar scale and configuration. Therefore, the Project's energy demands and energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

For the reasons outlined above, Project construction and operation would not result in the inefficient, wasteful or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional

energy producing or transmission facilities. The project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Finally, the Project proposes an expansion to an existing self-storage facility and will not have any long-term effects on an energy provider's future energy development or future energy conservation strategies.

Any impacts will be less than significant, and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

Less Than Significant Impact

Regarding federal transportation regulations, the Project site is located in an already developing suburban area and access to/from the Project site is from existing freeways and roads (i.e., I-215 Freeway, Haun Road, Newport Road). These roads are already in place so the Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be proposed in the Project area.

Regarding the State's Energy Plan and compliance with Title 24 California Code of Regulations energy efficiency standards, the Project developer will be required to comply with the California Green Building Standard Code requirements for energy efficient buildings and appliances as well as utility energy efficiency programs implemented by Southern California Edison and Southern California Gas Company.

Regarding Pavley (AB 1493) regulations, an individual project does not have the ability to comply or conflict with these regulations because they are intended for agencies and their adoption of procedures and protocols for reporting and certifying GHG emission reductions from mobile sources. However, the vehicles associated with the proposed Project would be required to comply with federal and state fuel efficiency standards.

Regarding the State's Renewable Energy Portfolio Standards, the project would be required to meet or exceed the energy standards established in the California Green Building Standards Code, Title 24, Part 11 (CALGreen). CALGreen Standards require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. Additionally, the 2022 solar mandate requires installation of solar panels on new single-family homes and multi-family homes up to three stories high.

The Project will purchase electricity through Southern California Edison which is subject to the requirements of California Senate Bill 100 (SB 100) which 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.

Therefore, the Project will not conflict with or obstruct a State or Local plan for renewable energy or energy efficiency. Any impacts are considered less than significant, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

7. GEOLOGY AND SOILS.

Source(s): *Map My County* (**Appendix A**); *Geotechnical and Infiltration Evaluation for Stax-Up Storage Expansion, 27887 Holland Road, Menifee, Riverside County, California,* prepared by GeoTek, Inc., 9-28-21 (*Geo Report*, **Appendix C**); *General Plan*; and *GPEIR* (Chapter 5.6, *Geology and Soils*).

Applicable General Plan Policies:

- **Goal S-1:** A community that is minimally impacted by seismic shaking and earthquake-induced or other geologic hazards.
- **Policy S-1.1:** Require all new habitable buildings and structures to be designed and built to be seismically resistant in accordance with the most recent California Building Code adopted by the City.
- **Goal S-2:** A community that has used engineering solutions to reduce or eliminate the potential for injury, loss of life, property damage, and economic and social disruption caused by geologic hazards such as slope instability; compressible, collapsible, expansive or corrosive soils; and subsidence due to groundwater withdrawal.
- **Policy S-2.1:** Require all new developments to mitigate the geologic hazards that have the potential to impact habitable structures and other improvements.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.i) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			**X**	

Less Than Significant Impact

A detailed *Geo Report* was prepared for the proposed Project. The City of Menifee is situated in the Peninsular Ranges geomorphic province which is characterized by a series of northwest-southeast oriented fault blocks. Several major fault zones are found in this province including the Elsinore Fault zone and the San Jacinto Fault zone which trend northwest-southeast and are found near the middle of the province. Although the Project site is located in seismically active Southern California, the site is not located within or adjacent to an Alquist-Priolo Earthquake Fault Zone. The nearest active faults are the Elsinore Fault located 6.5 miles to the southwest and the San Jacinto fault (Anza section) located approximately 10 miles northeast of the Project site.

Based on this information, implementation of the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area

or based on other substantial evidence of a known fault. Any impacts associated with rupture of a fault would be less than significant.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.ii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?			**X**	

Less Than Significant Impact

The proposed Project would be subject to ground shaking impacts should a major earthquake in the area occur. Potential impacts include injury or loss of life and property damage. The Project site is subject to strong seismic ground shaking as are virtually all properties in Southern California.

The Project *Geo Report* and County data indicate the property would be subject to moderate to high groundshaking from regional earthquakes. It should be noted this level of risk is similar to properties throughout the region. Peak Ground Acceleration (PGA) for the site is estimated at 0.688 g (or just over two-thirds of the force of gravity exerted horizontally).

The Project design shall be subject to the seismic design criteria of the most recent edition of the California Building Code (CBC) as adopted by the City of Menifee. This is a standard condition and is not considered unique mitigation under CEQA. The 2019 CBC (California Code of Regulations, Title 24, Volume 2) contains seismic safety provisions with the aim of preventing building collapse during a design earthquake, so that occupants would be able to evacuate after the earthquake. A design earthquake is one with a two percent chance of exceedance in 50 years, or an average return period of 2,475 years. Adherence to these requirements would reduce the potential of the structure from collapsing during an earthquake, thereby minimizing injury and loss of life. Although structures may be damaged during earthquakes, adherence to seismic design requirements would minimize damage to property within the structure because the structure is designed not to collapse. The CBC is intended to provide minimum requirements to prevent major structural failure and loss of life. Relevant CBC seismic design parameters for the Project site are set forth in the *Geo Report* and the Project shall comply with recommendations listed in the *Geo Report* to address strong seismic ground shaking and how it will reduce exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. This is a standard condition and is not considered unique mitigation under CEQA.

With adherence to standard conditions, implementation of the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Impacts related to ground shaking would be less than significant.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.iii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?			X	

Less Than Significant Impact

Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction is typified by a loss of shear strength in the liquefied layers due to rapid increases in pore water pressure generated by earthquake accelerations.

The current standard of practice, as outlined in the "Recommended Procedures for Implementation of DMG Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction in California" and "Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California" requires liquefaction analysis to a depth of 50 feet below the lowest portion of the proposed structure. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction. The *Geo Report* found the Project area underlain by undocumented fill, older alluvium, and tonalite bedrock.

According to the *Geo Report* and *Map My County*, the Project site is in a "low" liquefaction hazard zone. This indicates that the area has not been subject to historic occurrence of liquefaction, or local geological, geotechnical, and groundwater conditions do not indicate potential for permanent ground displacement such that mitigation as defined in Public Resources Code § 2693(c) would be required. Furthermore, the *Geo Report* states that "Groundwater was encountered at a depth of approximately 49 feet below the existing ground surface…It is estimated that the depth to high groundwater at the site is about 40 feet below existing site grade." The proposed structures will be supported by compacted fill and competent alluvium so the potential for earthquake induced liquefaction and lateral spreading beneath the proposed structures is considered low due to the recommended compacted fill, relatively low groundwater level, and the dense nature of the deeper onsite earth materials. The *Geo Report* also concluded the site had a very low potential for ground failure or lateral spreading.

Based on the above, implementation of the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic-related ground failure, including liquefaction. Any impacts would be less than significant.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.iv) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?				**X**

No Impact

The Project site is located near the southeast corner of Holland Road and Haun Road in the City of Menifee, California. The Project site is relatively flat with an average elevation of approximately 1,450 feet above mean sea level (AMSL). There are no steep slopes on or adjacent to the Project site. Therefore, the *Geo Report* concluded that landslides were not a design consideration. The closest steep slope is a local knoll located approximately one mile southwest the Project site.

Therefore, implementation the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. There would be no impact.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in substantial soil erosion or the loss of topsoil?			**X**	

Less Than Significant Impact

The Project site is in southwestern Riverside County within the Peninsular Ranges Geomorphic Province (Province). Geologic units within the Province consist of granitic and metamorphic bedrock highlands and deep and broad alluvium filled valleys. Specifically, the site is located on an old alluvial fan emanating from the surrounding uplands in the region. According to the *Geo Report*, the site is underlain by unconsolidated fill from previous development of the site, as well as older alluvial fan deposits overlying granitic tonalite bedrock at depth.

The Project proposes to construct three (3) new buildings - Building 1 with approximately 31,040 square feet and Buildings A and B with approximately 2,800 square feet each along with associated drive aisle and adjacent street pavement improvements. Buildings A and B are to be located in an area of an existing leachfield which is to be abandoned.

The Project has the potential to expose surficial soils to wind and water erosion during construction activities. 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. Water erosion will be prevented through the City'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. Following the proposed Project construction phase, the Project site would be covered completely by paving, structures, and landscaping. These requirements are standard conditions and are not considered unique mitigation under CEQA.

With regulatory compliance, impacts related to soil erosion would be less than significant and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			**X**	

Less Than Significant Impact

Impacts related to liquefaction and landslides are discussed in Thresholds 7.a.iii, and 7.a.iv. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to gravity and earthquake shaking combined. Such movement can occur on slope gradients of as little as one degree. Lateral spreading typically damages pipelines, utilities, bridges, and structures.

Lateral spreading of the ground surface during a seismic activity usually occurs along the weak shear zones within a liquefiable soil layer and has been observed to generally take place toward a free face (i.e., retaining wall, slope, or channel) and to lesser extent on ground surfaces with a very gentle slope. As discussed in 7.a.ii, the Project would be required to comply with standard conditions.

The *Geo Report* indicated the site was not subject to the cited unstable conditions (i.e., landslide, lateral spreading, subsidence, liquefaction or collapse) and concluded development of the site was feasible from a geotechnical engineering perspective. The *Geo Report* also recommended a number of design and construction requirements to be implemented during development to assure stability of the planned structures. The City's development review process will assure these recommendations are incorporated into the Project prior to the issuance of subsequent permits (e.g., grading, building, etc.). These actions are considered regulatory compliance and not project-specific mitigation under CEQA.

Therefore, implementation of the proposed Project would not result in on- or off-site impacts related to landslides, lateral spreading, subsidence, liquefaction or collapse. With regulatory compliance and adherence to the *Geo Report* recommendations, any impacts would be less than significant, and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial direct or indirect risks to life or property?			**X**	

Less Than Significant Impact

The CBC requires special design considerations for foundations of structures built on soils considered to be "expansive" as they can damage improved structures under certain conditions. According to the *Geo Report*, the preliminary laboratory test results indicate onsite earth materials at the Project site exhibit a LOW expansion potential as classified in accordance with 2019 CBC Section 1803.5.3 and ASTM D4829. Based on the laboratory testing of the Project site soils, the geologic units are anticipated to possess an Expansion Index of 21 to 50 ("low expansion potential"). The *Geo Report* further states that "conventional foundations supported by engineered fill may be used for this site."

The site preparation methods recommended within the *Geo Report* adequately address potential impacts related to expansive soils and no mitigation measures would be required. Any impacts would be less than significant, and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?			**X**	

Less Than Significant Impact

The Project proposes to remove the existing septic and leachfield and replace it with two smaller facilities. All new septic system installations must be approved by the County Department of Health prior to occupancy. This is considered regulatory compliance and not unique mitigation under CEQA. With this regulatory compliance, impacts will be less than significant.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			**X**	

Less Than Significant Impact

According to *Map My County*, the Project site is mapped as a "High B" sensitivity area which means it has a high sensitivity for paleontological resources. Areas classified as high sensitivity may contain buried paleontological deposits at or below 4 feet of depth and may be impacted if construction exceeds that depth. However, the site has been previously disturbed by development including buildings and asphalt drive aisles similar to those proposed for the Project. In addition, the area and depth anticipated for Project development is very limited in terms of area and depth. Due to the low intensity of planned construction and the fact the entire site was previously disturbed, site preparation and building construction is not expected to reach depths where fossiliferous materials may be present. The City will incorporate a Condition of Approval to ensure that if any fossiliferous materials are found during site preparation, work will be halted in that area and a qualified paleontologist will be retained to evaluate the materials and determine the appropriate course of action (e.g., excavation, collection, preservation,

etc.). Based on available information and characteristics of the proposed Project, potential impacts to paleontological resources are considered to be less than significant.

Mitigation Measures

No mitigation measures are required.

8. GREENHOUSE GAS EMISSIONS.

Source(s): *General Plan*; *StaxUp Storage Expansion Project Air Quality, Greenhouse Gas, and Energy Analysis Technical Memorandum*[1], prepared by KW Air Quality & Noise, LLC, 7-29-2022 (*AQ/GHG Analysis*, **Appendix B1**); StaxUp Storage Expansion Project Air Quality/Greenhouse Gas Letter Memorandum[3], prepared by KW Air Quality & Noise, LLC, 11-21-2022 (*AQ/GHG Memo*, **Appendix B2**); and *StaxUP Storage Expansion Project Trip Generation & Vehicle Miles Traveled (VMT) Study, City of Menifee,* prepared by RK Engineering Group, Inc., 5-31-2022 (*VMT Memo*, **Appendix F**).

Applicable General Plan Policies:

- **Goal OSC-4:** Efficient and environmentally appropriate use and management of energy and mineral resources to ensure their availability for future generations.
- **Policy OSC-4.1:** Apply energy efficiency and conservation practices in land use, transportation demand management, and subdivision and building design.
- **Policy OSC-4.2:** Evaluate public and private efforts to develop and operate alternative systems of energy production, including solar, wind, and fuel cell.
- **Goal OSC-10:** An environmentally aware community that is responsive to changing climate conditions and actively seeks to reduce local greenhouse gas emissions.
- **Policy OSC-10.1:** Align the City's local GHG reduction targets to be consistent with the statewide GHG reduction target of AB 32.
- **Policy OSC-10.2:** Align the City's long-term GHG reduction goal consistent with the statewide GHG reduction goal of Executive Order S-03-05.
- **Policy OSC-10.3:** Participate in regional greenhouse gas emission reduction initiatives.
- **Policy OSC-10.4:** Consider impacts to climate change as a factor in evaluation of policies, strategies, and projects.

Analysis of Project Effect and Determination of Significance:

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

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			**X**	

Less Than Significant Impact

Overview and Thresholds

[3] It should be noted the *AQ/GHG Analysis* was prepared in July 2022 based on a total of 43,125 square feet of new building area while the current Project proposes 36,640 square feet of new building. The November *AQ/GHG Memo* documents that this reduction in square footage would actually result in a 15% decrease in potential operational air pollutant and GHG emissions but the estimates from the July *AQ/GHG Analysis* are cited in this section as representative "worst case" conditions which will not be exceeded by the current Project.

Greenhouse Gas (GHG) emissions for the Project were analyzed in the *AQ/GHG Analysis* to determine if the Project could have an impact related to GHG emissions. These impacts are analyzed on a cumulative basis, utilizing Carbon Dioxide Equivalent (CO_2e), measured in metric tons (MT) or $MTCO_2e$. They were analyzed for both the construction and operation of the Project. The California Emissions Estimator Model Version 2022.1 (CalEEMod) was used to calculate GHG pollutants from the Project. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify criteria and GHG air pollutant emissions. The model quantifies direct emissions from construction and operation activities (including vehicle use), as well as indirect emissions, such as emissions from off-site energy generation, solid waste disposal, vegetation planting and/or removal, and water use. The model also helps identify mitigation measures to reduce criteria and GHG pollutant emissions. The model was developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the California air districts.

The South Coast Air Quality Management District (SCAQMD) describes a five-tiered approach for determining GHG Significance Thresholds. The City of Menifee utilizes the Tier 3 Thresholds which consist of screening values that are intended to capture 90 percent of the GHG emissions from projects. If a project's emissions are under the screening thresholds, then the project is less than significant. SCAQMD has presented two options that lead agencies could choose for screening values. Option #1 sets the thresholds for residential projects to 3,500 $MTCO_2e$/year, commercial projects to 1,400 $MTCO_2e$/year), and the mixed use to 3,000 $MTCO_2e$/year. Option #2 sets a single numerical threshold for all non-industrial projects of 3,000 $MTCO_2e$/year. The current staff recommendation is to use option #2 but allows lead agencies to choose option #1 if they prefer. Regardless of which option a lead agency chooses to follow, it is recommended that the same option is consistently uses for all projects. **Table 8-1, *SCAQMD Tier 3 GHG Screening Values***, shows the screening levels described in option #2, which has been used previously in the City of Menifee. The City of Menifee uses Option #2 (3,000 $MTCO_2$/year for all non-industrial projects).

Table 8-1
SCAQMD Tier 3 GHG Screening Values

Land Use	Screening Value
Industrial Projects	10,000 $MTCO_2e$/Year
Residential/Commercial Projects	3,000 $MTCO_2e$/Year

If its GHG emissions are less than the SCAQMD GHG thresholds of significance, a project is considered to have less than significant GHG emissions under CEQA and is in compliance with the applicable State GHG legislation.

The City of Menifee has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. A screening threshold of 3,000 MT CO2e per year to determine if additional analysis is required is an acceptable approach for small projects. This approach is a widely accepted screening threshold used by the City of Menifee and numerous cities in the South Coast Air Basin and is based on the SCAQMD staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans. The SCAQMD's draft threshold uses the Executive Order S-3-05 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's

objective would contribute to worldwide efforts to cap carbon dioxide concentrations at 450 ppm, thus stabilizing global climate.

Construction GHG Emissions

Greenhouse gas emissions are estimated for on-site and off-site construction activity using the most current version of the California Emissions Estimator Model (CalEEMod 2022.1). **Table 8-2, *Construction Greenhouse Gas Emissions***, shows the construction greenhouse gas emissions, including equipment and worker vehicle emissions for all construction activities. Construction emissions are averaged over 30 years and added to the long-term operational emissions, pursuant to SCAQMD recommendations.

Table 8-2
Construction Greenhouse Gas Emissions

2021 Emissions ($MTCO_2e$)[1]			
Total CO_2	**Total CH_4**	**Total N_2O**	**Total**
8.35	0.00	0.00	8,43

[1] $MTCO_2e$=metric tons of carbon dioxide equivalents (includes carbon dioxide, methane, nitrous oxide, and/or hydroflurocarbons). The emissions are averaged over 30 years and added to the operational emissions, pursuant to SCAQMD recommendations.

Evaluation of the table above indicates that an estimated 8.43 $MTCO_2E$ will occur from Project construction equipment over the course of the estimated construction period. The total GHG emissions from Project construction were amortized and are included in **Table 8-3, *Operational Greenhouse Gas Emissions***.

Operational GHG Emissions

Greenhouse gas emissions are estimated for on-site and off-site operational activity using CalEEMod. Operational emissions associated with the Project would include GHG emissions from the following sources:

- Mobile sources (transportation);
- Energy (electricity and natural gas);
- Water use and treatment; and
- Solid Waste disposal.

Mobile sources include emissions from the additional vehicle miles generated from the proposed Project. The vehicle trips associated with the proposed project have been analyzed based on CalEEMod defaults. The CalEEMod program then applies the emission factors for each trip which is provided by the EMFAC2021 model to determine the vehicular traffic pollutant emissions.

Energy usage includes emissions from the generation of electricity and natural gas used on-site. Water use and treatment includes the water used for the interior of the building as well as for landscaping and is based on the GHG emissions associated with the energy used to transport and filter the water. Solid waste disposal includes the GHG emissions generated from the processing of waste from the proposed Project as well as the GHG emissions from the waste once it is interred into a landfill.

Greenhouse gas emissions 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 in **Table 8-3, *Operational Greenhouse Gas Emissions***.

Table 8-3
Operational Greenhouse Gas Emissions

Emission Source	GHG Emissions ($MTCO_2e$)1
All Sources	259.00
Construction (amortized over 30 years)	8.43
Total Annual Emissions	**267.43**
SCAQMD Tier 3 Screening Threshold2	3,000.00
Exceed Tier 3 Threshold?	No

[1] $MTCO_2e$ = metric tons of carbon dioxide equivalents
[2] Per South Coast Air Quality Management District (SCAQMD) Draft Guidance Document - Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008

The analysis 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 8-3**, Project GHG emissions are expected to be 267.43 $MTCO_2e$ which is well below the 3,000 $MTCO_2e$ SCAQMD threshold.

In addition, the Project must follow all standard SCAQMD rules and requirements which are standard conditions. Compliance with these conditions is considered a standard requirement and included as part of the Project's design features, not unique mitigation under CEQA.

Therefore, the 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.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?			**X**	

Less Than Significant Impact

The Project is consistent with the land use designation and zoning requirements for this site. Additionally, the Project will comply with the mandatory requirements of Title 24 Part 1 of the California Building Standards Code and Title 24 Part 6 Building and Energy Efficiency Standards. The Project will be consistent with all the applicable plans, policies and regulation for the purpose of reducing GHG gases.

In addition, the SCAQMD's Tier 3 thresholds used Executive Order S-3-05 goal as the basis for deriving the screening levels outlined in Threshold 8.a above. The California Governor issued Executive Order S-3-05, GHG Emission, in June 2005, which established the following reduction targets:

- 2010: Reduce greenhouse gas emissions to 2000 levels
- 2020: Reduce greenhouse gas emissions to 1990 levels

- 2050: Reduce greenhouse gas emissions to 80 percent below 1990 levels.

In 2006, the California State Legislature adopted AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires CARB, to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020 through an enforceable statewide emission cap which was phased in starting in 2012.

Therefore, as the Project's emissions meet the threshold for compliance with Executive Order S-3-05, the project's emissions also comply with the goals of AB 32. Additionally, as the project meets the current interim emissions targets/thresholds established by SCAQMD, the Project would also be on track to meet the reduction target of 40 percent below 1990 levels by 2030 mandated by SB 32. Furthermore, the majority of post 2020 reductions in GHG emissions are addressed via regulatory requirements at the State level and the Project will be required to comply with these regulations as they come into effect. Therefore, the Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Impacts are less than significant, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

9. HAZARDS AND HAZARDOUS MATERIALS.

Source(s): *Map My County* (**Appendix A**); **Figure 3, *General Plan Land Use Designations***, and **Figure 6, *Aerial Photo***, provided in Section I of this Initial Study; Geotracker Website, State Water Boards, November 2022; EnviroStor Website, State Department of Toxic Substances Control (DTSC), November 2022; *General Plan*; *GPEIR* (Chapter 5.8, *Hazards and Hazardous Materials*); *General Plan, Safety Element, Exhibit S-6, High Fire Hazard Areas*; Menifee Union School District website; Perris Union High School District website; and Google Earth.

Applicable General Plan Policies:

- **Goal S-4:** A community that has effective fire mitigation and response measures in place, and as a result is minimally impacted by wildland and structure fires.
- **Policy S-4.1:** Require fire-resistant building construction materials, the use of vegetation control methods, and other construction and fire prevention features to reduce the hazard of wildland fire.
- **Policy S-4.2:** Ensure to the maximum extent possible, that fire services, such as firefighting equipment and personnel, infrastructure, and response times, are adequate for all sections of the city.
- **Policy S-4.4:** Review development proposals for impacts to fire facilities and compatibility with fire areas or mitigate.
- **Goal S-5:** A community that has reduced the potential for hazardous materials contamination.
- **Policy S-5.2:** Ensure that the fire department can continue to respond safely and effectively to a hazardous materials incident in the City, whether it is a spill at a permitted facility, or the result of an accident along a section of the freeway or railroads that extend across the City.
- **Policy S-5.4:** Ensure that all facilities that handle hazardous materials comply with federal and state laws pertaining to the management of hazardous wastes and materials.
- **Policy S-5.5:** Require facilities that handle hazardous materials to implement mitigation measures that reduce the risks associated with hazardous material production, storage, and disposal.
- **Goal S-6:** A City that responds and recovers in an effective and timely manner from natural disasters such as flooding, fire, and earthquakes, and as a result is not impacted by civil unrest that may occur following a natural disaster.
- **Policy S-6.1:** Continuously review, update, and implement emergency preparedness, response, and recovery plans that make the best use of the City- and county-specific emergency management resources available.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			**X**	

The Project site occupies 8.4 acres (gross/net) and is situated approximately 700 feet west of Interstate-215 (I-215) near the southeast corner of Haun Road and Holland Road. The proposed Project could result in a significant hazard to the public if its construction or operation included the routine transport, use, or disposal of hazardous materials or placed housing near a facility which routinely transports, uses, or disposes of hazardous materials. The Project involves expansion of an existing StaxUp Self-Storage Facility in the southern, relatively rural portion of the City of Menifee. The expanded operation of this facility is not expected to involve the use of substantial amounts of hazardous materials since the storage agreement specifically precludes hazardous materials. Household cleaning supplies would be used in small quantities to support the administrative office in the new Building 1. Compliance with all Federal, State, and local regulations governing the storage and use of hazardous materials is required and will ensure that the Project operates in a manner that poses no substantial hazards to the public or the environment.

The Project site is generally surrounded by vacant land except for an outdoor truck yard just east of the site. The Project site and the lands adjacent to the site are all designated part of the City's Economic Development Corridor (EDC) in the General Plan and zoned Economic Development Corridor-Community Core (EDC-CC). There are several residential subdivisions approximately 1,000 feet west/northwest of the site north of Holland Road,

The proposed Project would not place housing near any hazardous materials facilities. The routine use, transport, or disposal of hazardous materials is primarily associated with industrial uses that require such materials for manufacturing operations or produce hazardous wastes as by-products of production applications. The Project does not propose or facilitate any activity involving significant use, routine transport, or disposal of hazardous substances as part of expansion of the existing commercial use. The largest new building of the Project is being proposed in the northern portion of the site which currently contains unpermitted storage of large vehicles which will be removed as part of Project development. It should also be noted the approved Holland Road Overpass will be constructed just north of the site over the I-215 Freeway.

During construction, there would be some small amount of transport, use, and disposal of hazardous materials and wastes that are typical of construction project sites. 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.

Therefore, based on the above, because the transport, use, storage, and disposal of hazardous materials pertaining to the proposed Project would be relatively minor and subject to extensive regulatory oversight, the impact would be less than significant. Use of common household hazardous materials and their disposal does not present a substantial health risk to the community. Impacts associated with the routine transport and use of hazardous materials or wastes would be less than significant and no mitigation is required.

Would the Project?	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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?			**X**	

The proposed Project is not located on a site listed on the state Cortese List, a compilation of various sites throughout the state that have been compromised due to soil or groundwater contamination from past uses (see Threshold 9.d).

The Project site is currently developed as a StaxUp Self-Storage Facility with unpermitted storage of large vehicles on the north end of the property. There would be some impacts related to the demolition of structures related to the unpermitted storage of large vehicles, but they are recent enough that they have minimal risk of having asbestos containing materials or lead-based paint. Therefore, the potential for the Project to 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 would be relatively low.

The Project site and surrounding areas were historically used for low intensity agriculture (i.e., dry-farming and/or grazing) during the later half of the 1900's. Currently, the property is regularly maintained for weed abatement. Environmentally persistent pesticides commonly applied prior to the 1980s can linger in the soil for many years. It is not known if environmentally persistent pesticides were applied at the Project site. However, dry farming activities typically use the least amount and variety of agricultural chemicals compared to more intensive farming activities. It should also be noted the site has already been developed with the aforementioned uses and may have been evaluated at that time for potential persistent agricultural chemicals. Based upon the length of time that has elapsed since agricultural usage has occurred, it is unlikely the potential former usage of pesticides has significantly impaired the Project site or would require remedial action on the two areas of the site planned for new buildings (i.e., northern and southwest portions). As such, any impacts would be less than significant, and no mitigation is required.

The potential still exists for an unseen event to occur during both the construction and operation phases. With adherence to existing local, state and federal regulations, as they pertain to the treatment of hazardous materials, the proposed Project would not 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.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			**X**	

The Project site is located within the boundaries of the Menifee Union School District (MUSD) for elementary and middle school, and Perris Unified High School District (PUHSD) for high school. Existing schools closest to the Project site are shown in **Table 9-1**, ***Existing Schools Closest to Project Site***.

Table 9-1
Existing Schools Closest to Project Site

School Facility	Distance/Direction from Project Site
Chester Morrison Elementary School	1.0 mile northwest
Evans Ranch Elementary School	1.4 miles northwest
Bell Mountain Middle School	0.7 mile northeast
Paloma Valley High School	0.8 mile southwest
Santa Rosa Academy (private)	0.5 mile northwest

Source: Google Earth

As shown above, the private Santa Rosa Academy is the closest school facility, situated approximately a half mile northwest of the Project site. No other elementary, middle, or high schools exist, or are proposed, within one-quarter mile of the Project site.

As discussed in Thresholds 9.a and Threshold 9.b, the potential exists for the proposed Project to create less than significant hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials; and/or, 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 during both construction and operations.

In addition, routine construction control measures and best management practices for hazardous materials storage, application, waste disposal, accident prevention and clean-up, etc. would be employed in conjunction during construction and operation of the proposed Project.

With adherence to existing local, state and federal regulations, as they pertain to the treatment of hazardous materials, the proposed Project would not 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.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) 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?				**X**

The Project site is not listed on any summary governmental databases as having any incidents involving hazardous materials either now or in the past. In the surrounding area, the only site identified on the Geotracker Database Website maintained by the State Water Boards is the Santa Rosa Academy Charter School (Case # SR0025507) located at 27587 La Piedra Road in Menifee a half mile northwest of the Project site. This location was a Cleanup Program Site for minor amounts of lead (no other contaminant was specified). The status on this site is that all actions were completed, and the case closed on 7/21/2012 and no further action was required. The Envirostor Database Website maintained by the State Department of Toxic Substances Control (DTSC) lists no hazmat-related sites within a half-mile of the Project site.

The proposed Project is not located on a site listed on the state Cortese List, a compilation of various sites throughout the state that have been compromised due to soil or groundwater contamination from past uses. According to information compiled from governmental databases, the Project site is not:

- Listed as a hazardous waste and substance site by the Department of Toxic Substances Control (DTSC);
- Listed as a leaking underground storage tank (LUST) site by the State Water Resources Control Board (SWRCB);
- Listed as a hazardous solid waste disposal site by the SWRCB;
- Currently subject to a Cease and Desist Order (CDO) or a Cleanup and Abatement Order (CAO) as issued by the SWRCB; or
- Developed with a hazardous waste facility subject to corrective action by the DTSC.

Based on the above information, there would be no impact and no mitigation is required.

Would the Project?	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?				**X**

The entire Project site is not located in any airport compatibility zone for any local airport. There would be no impact from airport noise.

Would the Project?	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			**X**	

The Project proposes to expand an existing self-storage facility. Primary and secondary access to the Project site would be provided along a frontage road to be constructed as part of the approved Holland Road Overpass project over the I-215 Freeway 700 feet east of the Project site.

A limited potential exists for the Project to interfere with an emergency response or evacuation plan during construction. Construction work on Haun Road to the west or Holland Road to the north from Project-related activities would be minimal other than the new accessing driveways. It is noted that utility lateral connections are already in-place. There will be minimal impact associated with a new frontage road intersection on Holland Road for access to the Project site. 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.

The traffic control plan (TCP) is designed to alleviate any construction circulation impacts. The TCP is a standard condition and is not considered unique mitigation under CEQA. Following construction, emergency access to the Project site and area will remain as was prior to the proposed Project.

All Project elements, including landscaping, will be located with sufficient clearance from the proposed three new buildings so as not to interfere with emergency access to and evacuation from the site. The proposed Project is required to comply with the California Fire Code as adopted by the Menifee Municipal Code.

The proposed Project will not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan, because no permanent public street or lane closures are proposed.

Project impacts would be less than significant, and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

The proposed Project site and immediate surrounding area is not located within a Very High Fire Hazard Safety Zone and/or a Local Responsibility Area according to the City General Plan, Safety Element (Exhibit S-6). The proposed Project has been reviewed, and conditions of approval have been issued to address any potential impacts related to fire hazards, consistent with the Fire Hazards section of the Safety Element of the General Plan. 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 the General Plan as well as with the current building code. Adherence to the other fire protection regulatory compliance are typically standard conditions of approval and are not considered unique mitigation pursuant to CEQA. With the incorporation of applicable requirements of the State Fire and Building Codes, as adopted by the City, impacts from wildland fire hazards are less than significant and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

10. HYDROLOGY AND WATER QUALITY.

Source(s): *Preliminary Hydrology and Hydraulics Report, Menifee StaxUp Storage Expansion*, prepared by SP2 & Co., 1-2023 (*Hydro Report*, **Appendix E1**); *Project-Specific Water Quality Management Plan, Menifee StaxUp Storage Expansion*, prepared by SP2 & Co., 1-2023 (*WQMP*, **Appendix E2**); *Water and Sewer Will Serve Letter*, prepared by Eastern Municipal Water District, 4-7-2022 (*Will Serve Letter*, **Appendix H**); *Geotechnical and Infiltration Evaluation for Stax-Up Storage Expansion, 27887 Holland Road, Menifee, Riverside County, California,* prepared by GeoTek, Inc., 9-28-21 (*Geo Report*, **Appendix C**); *2020 Urban Water Management Plan* (*UWMP*), Eastern Municipal Water District; Metropolitan Water District *2020 Regional Urban Water Management Plan* (*RUWMP*); *2019 Sewer System Management Plan*, EMWD; and Project Plans (**Appendix G**).

Applicable General Plan Policies:

Safety Element

- **Goal S-3:** A community that is minimally disrupted by flooding and inundation hazards.

Open Space and Conservation (OSC) Element

- **Policy OSC-7.9:** Ensure that high quality potable water resources continue to be available by managing stormwater runoff, wellhead protection, and other sources of pollutants.

- **Policy OSC-7.10:** Preserve natural floodplains, including Salt Creek, Ethanac Wash, Paloma Wash, and Warm Springs Creek, to facilitate water percolation, replenishment of the natural aquifer, proper drainage, and prevention of flood damage.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			**X**	

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. Relative to this specific issue, a significant impact could occur if the Project would discharge water that does not meet the quality standards of the agencies that 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. A *WQMP* and a *Hydro Report* were prepared for the proposed Project.

On January 29, 2010, the Santa Ana Regional Water Quality Control Board (SARWQCB) issued the 4th-term area wide NPDES and Municipal Separate Storm Sewer System Permit (MS4 Permit) to the City of Menifee and other applicable Permittees. All new development in the City is required to comply with provisions of the NPDES program, including Waste Discharge Requirements (WDR), and the City's Municipal Separate Sewer Permit (MS4), Order No. R8-2010-0036, NPDES Permit No. CAS618036, as enforced by the SARWQCB. All design submittals and construction projects are required to conform to the permit requirements. Furthermore, all projects are required to install Best Management Practices (BMPs) in compliance with the 2010 SARWQCB permit.

According to the *WQMP*, the Project site and the City of Menifee is located in the Santa Ana River Watershed. The watershed covers approximately 2,800 square miles with about 700 miles of rivers and major tributaries. More specifically, the Project site is located within Reach 4 of the Santa Ana River Watershed and the San Jacinto Valley Sub-Watershed. Runoff from the Project site would flow along San Jacinto River Reach 2 into Canyon Lake (Railroad Canyon Reservoir) and finally Lake Elsinore far downstream of the site. During flooding and heavy storms, Lake Elsinore drainage overflows into the Temescal Wash via Temescal Creek (portion of the Elsinore Sub-Watershed) which extends north/northwest to its confluence with the Santa Ana River at the Prado Dam. **Table 10-1, *Downstream Receiving Bodies***, shows the three water bodies downstream of the Project site and their water quality restrictions under the Clean Water Act (CWA) Section 303 (d) – Impaired Receiving Waters. The designated beneficial uses of these waterways are part of the Santa Ana River Basin Plan which protects regional water quality.

Table 10-1
Downstream Receiving Bodies

Receiving Waters	U.S. EPA Approved CWA 303(d) List Impairments	Designated[1] Beneficial Uses
San Jacinto River Reach 2 - Canyon Lake (HU 802.11)	Pathogens, Nutrients	MUN-AGR-GWR-REC1-REC2- WARM-WILD
Lake Elsinore (HU 802.31)	Nutrients, PCB's, Organic Enrichment/ Dissolved Oxygen, Sediment Toxicity, Unknown Toxicity	REC-1-REC2-WARM-WILD

[1] AGR=agriculture, GWR=groundwater recharge, MUN=municipal water supply, REC-1=contact recreation, REC-2=non-contact recreation, WARM=warm freshwater habitat, WILD=wildlife

The Water Quality Control Plan for the Santa Ana River Basin (Basin Plan), last updated in February 2016, establishes water quality standards for groundwater and surface water in the Basin, and standards for both beneficial uses of specific water bodies and the water quality levels that must be maintained to protect those uses. The Basin Plan includes an implementation plan describing actions by the Santa Ana RWQCB and others needed to achieve and maintain the water quality standards. The Santa Ana RWQCB regulates waste discharges to minimize and control their effects on the quality of the region's groundwater and surface waters. The Basin Plan lists water quality problems for the region along with their causes where they are known. Plans for improving water quality are included for water bodies with quality below the levels needed to enable all the beneficial uses of the water.

At present, the Project site is developed with two uses, the StaxUp Self-Storage Facility in the central and southern portions of the site and temporary, unpermitted storage of large vehicles in the northern portion of the site. The storage facility has largely impervious

surfaces while the area used for unpermitted storage of vehicles has a pervious surface (i.e., gravel parking). There are minimal onsite drainage improvements, and the existing site drainage pattern is to the west and north.

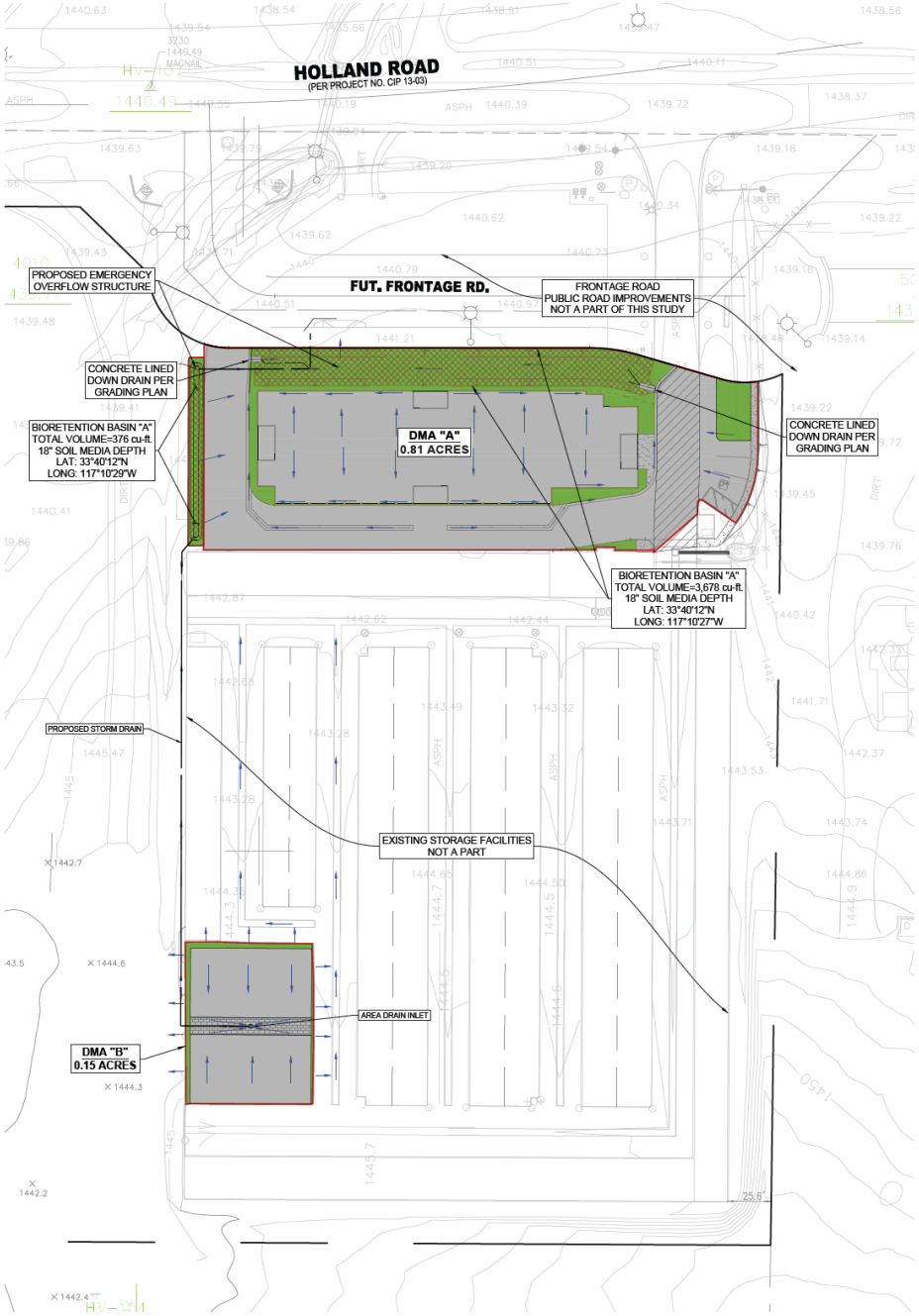
The proposed Project is the development of approximately one acre of the 8.4-acre site and expanding the onsite self-storage facility. The site is divided into two Drainage Management Areas (DMA "A" and "B") as described below:

DMA "A" occupies 0.8-acre and currently slopes to the north and ultimately crosses under Holland Road via an existing culvert. The proposed DMA "A" collects the runoff from the proposed impervious areas in BMP bioretention basin of which the treated outflow is plumbed to the future drainage improvements that are part of future frontage Road. For DMA A, the proposed roof down drains will be placed to the nearest landscaped area with a splash block where possible. The proposed paved areas within DMA A all drain towards a bioretention basin.

DMA "B" occupies 0.2-acre and is presently in a sump condition and ponds during storm events. The improvements to DMA "B" include all of the runoff from the proposed roofs to an area with a Best Management Practices (BMP) permeable pavers and gravel reservoir. For DMA B, where possible, proposed roof down drains will be placed at landscaped areas. The proposed paved surfaces will however flow directly to an area drain that is plumed directly into a second bioretention basin.

The basins have been designed based on the site-specific infiltration testing results outlined in the Project *Geo Report* (i.e., relatively slow at 1.6 inches/hour). The infiltration basins have been sized to accommodate surface runoff within the Project site under post-development conditions as outlined in the Project *Hydro Report* and *WQMP*. Note that all site runoff will drain to water quality treatment areas before leaving the property. The design of the Project water quality improvements is shown in **Figure 10-1, *Project WQMP Improvements***.

FIGURE 10-1
PROJECT WQMP IMPROVEMENTS

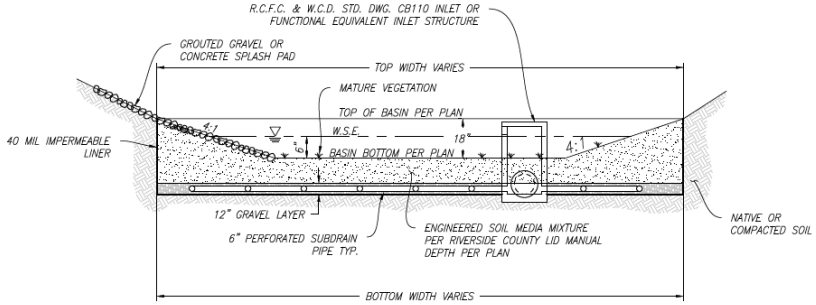


LEGEND:

- FLOW ARROW
- DMA BOUNDARY
- IMPERVIOUS AREAS: (PAVED / ROOFED AREAS)
- PERVIOUS AREAS: (OPEN SPACE AND LANDSCAPING)
- PROPOSED BMP AREAS
- PROPOSED STORM DRAIN

BMP DESIGN VOLUME SUMMARY: D_{85}=0.58 inches

DMA ID	IMPERVIOUS AREAS: ROOFS, SIDEWALKS, & STREETS/PARKING (ft^2)	PERVIOUS AREAS: OPEN SPACES & LANDSCAPING (ft^2)	BASIN AREA (ft^2)	TOTAL AREA (ft^2)	V_{BMP} (CU-FT.)	QBMP (CFS)	PROPOSED BASIN VOLUME (CU-FT.)
A	27,365	3,217	4,804	35,386	1,223	0.1	3,678
B	6,300	851	713	7,864	280	0.1	376
TOTAL	33,665	4,068	5,517	43,250	1,503	0.2	4,054



BIORETENTION BASIN TYPICAL DETAIL
N.T.S.

Construction Impacts

The Project site is already developed so clearing and grading activities would likely disturb a minimal amount of soil along and little if any existing vegetation, but which could potentially result in some erosion and possibly sedimentation. If left exposed and with no vegetative cover, areas of bare soil could be subject to wind and water erosion. Three general sources of potential short-term, construction-related stormwater pollution associated with the proposed Project include: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth-moving activities which, when not controlled, may generate soil erosion via storm runoff or disturbance by mechanical equipment.

Since the Project involves about 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 City and would ensure applicable water quality standards are appropriately maintained during construction of the proposed Project. The SWPPP is considered regulatory compliance and not unique mitigation under CEQA. The *WQMP* also indicates the Project will be covered by the Statewide Construction General Permit. Based on Project design and regulatory compliance, construction-related water quality impacts are less than significant, and no mitigation is required.

Operational Impacts

Development of the proposed self-storage facility expansion Project would incrementally increase the impervious area of the site by paving over the existing/unpermitted gravel truck storage area. Once completed the site would be fully developed with largely impervious surfaces storage buildings and paved drive aisles (except for landscaping). The Project proposes two onsite infiltration basins (in the north and northeast portions of the site) as the primary Best Management Practice (BMP) recommended in the *WQMP*. Since it is already developed, the site currently has approximately 98% impervious surfaces and the *WQMP* indicates the site will continue to have that amount of impervious surfaces when completed. Based on Project design and regulatory compliance, water quality impacts related to Project operation are less than significant and no mitigation is required

Conclusion

The proposed Project development plan has been reviewed and conditioned by the City of Menifee Engineering Department and Building & Safety Department, among others, to reduce any potential impacts as listed above through site design. 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 City and will ensure applicable water quality standards are appropriately maintained during construction of the proposed Project.

In addition, the Project has prepared a *WQMP* pursuant to the requirements of the NPDES. The SWPPP and *WQMP* are standard conditions of the City and are not considered mitigation for CEQA implementation purposes.

At Project completion, the Project site will be covered mainly by impervious surfaces including buildings, drive aisles, and landscaping. The *Hydro Report* and *WQMP*

demonstrate that the Project will not contribute to erosion, siltation, or other water pollutants to downstream drainages. 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.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?			X	

Less Than Significant Impact

The Eastern Municipal Water District (EMWD) provides water to the Project site. EMWD is a public water agency formed in 1950 and annexed into the service area of the Metropolitan Water District of Southern California (MWD) in 1951. It is currently one of MWD's 26 member agencies and presently operates its water supply system under a system permit issued by the California Department of Public Health. Presently, EMWD has four sources of water supply: 1) Potable groundwater; 2) Desalinated groundwater; 3) Recycled water; and 4) Imported water from MWD. According to 2020 figures, imported water accounts for approximately 46% of the total water supply, while local potable groundwater accounts for approximately 12%, desalted groundwater was approximately 6%, and recycled water is approximately 36%.

The *Geo Report* indicates that groundwater beneath the site is relatively shallow and was found to a depth of 40 feet below ground surface during onsite borings.

The Project would be supplied with water by EMWD which uses imported water from MWD, local groundwater, and recycled water to meet its customer demands. Using imported surface water helps prevent overdraft of local groundwater basins. The proposed Project is consistent with the General Plan and zoning designations for the site (economic development corridor). The EMWD's 2020 *UWMP* was based on the land uses of the City's General Plan, so the UWMP accounts for future growth like the proposed Project. The anticipated available water supply within EMWD's retail service area is anticipated to be greater than the demand for water in the future, which indicates that EMWD has available capacity to serve the proposed Project without significant adverse impacts on area groundwater basins. A groundwater recharge/storage program within the San Jacinto Basin has been developed by EMWD. It was concluded that the average percolation rate in these basins is 6.30 feet/day and it was determined that imported water can be successfully stored seasonally.

As stated above, local potable groundwater accounted for approximately 12% of the EMWD water supply in 2020, desalted groundwater was approximately 6%, and recycled water was approximately 36%. Most of the remaining water demands are met with imported water purchased from MWD. According to the *2020 RUWMP*, over 90% of the groundwater used in Metropolitan's service area is produced from adjudicated or managed groundwater basins.

The Project does not propose to substantially change the runoff characteristics of the site which at present is largely impervious so very little natural runoff percolates back into the ground onsite. However, the Project includes two infiltration basins which will allow onsite runoff to percolate back into the ground. Thus, no component of the proposed Project will deplete groundwater supplies beyond identified and planned capacities. 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 continued local groundwater recharge. This will offset any impacts from the other non-pervious elements contained in the proposed Project.

Therefore, implementation of the proposed Project will not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the regional basin. Any impacts are less than significant, and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.i) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?			**X**	

Less Than Significant Impact

Please reference the discussion set forth in Threshold 10.b, relative to the Project design which will not substantially alter the existing drainage pattern of the site or the area. The existing onsite drainage is via sheetflow to the north and west and the Project will install two infiltration basins in the north-northeast portions of the site to collect runoff and provide passive water quality treatment and detention/infiltration. There is a former natural north-flowing drainage approximately 500 feet west of the site that has been channelized to just south of Holland Road, from there is flows in a drainage swale to the northeast, east, then north along the west side of the I-215 Freeway. There are no other natural streams, rivers or discernable drainage features within, contiguous to, or adjacent to the Project site.

Development of the proposed commercial Project will incrementally increase the impervious area of the site (8.4 gross acres) as the site is already developed as a self-storage facility (largely impervious) and unpermitted storage of large vehicles (largely pervious). The Project will add three storage buildings connected by paved drive aisles landscaping, and two new onsite infiltration basins. Landscaping of the facility will meet City requirements. The site currently has 98% impervious surfaces and the *WQMP* indicates the site will maintain that same ratio after the storage facility is expanded and the unpermitted storage of large vehicles is removed.

As set forth in the Project *Hydro Report*, the two-year 24-hour storm runoff volume for the existing site is estimated to be 0.06 cubic feet per second (cfs) while the post-development two year 24-hour runoff volume would be 0.16 cfs (+0.10 cfs). The post-development runoff will be accommodated in two new onsite infiltration basins (north and northeastern portions of the site) so there will be no net increase in offsite downstream runoff as a result of the proposed Project. The SWPPP and the *WQMP* will address and control potential erosion both in the short-term during construction and over the long-term during Project occupancy.

The proposed Project is not anticipated to significantly change the volume of flows downstream of the Project site and would not be anticipated to change the amount of surface water in any water body in an amount that could initiate a new cycle of erosion or sedimentation downstream of the Project site.

Surface runoff will be discharged in conformance with Riverside County and City of Menifee requirements. The downstream drainage system will not need to be altered given the control of future surface runoff from the Project site. Implementation of the SWPPP and *WQMP* will ensure that the post-Project development of the site will not cause or result in substantial on- or off-site erosion or siltation. Any impacts will be less than significant, and with regulatory compliance, no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.ii) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?			**X**	

Less Than Significant Impact

The Project *Hydro Report* estimates the two-year 24-hour storm runoff volume for the existing site to be 0.06 cubic feet per second (cfs) while the post-development two year 24-hour runoff volume would be 0.16 cfs (+0.10 cfs). The post-development runoff will be accommodated in two new onsite infiltration basins (in the north and northeastern portions of the site) so there will be no net increase in offsite downstream runoff as a result of the proposed Project. According to the *WQMP*, the design capture volumes of the two proposed infiltration basins on the site will not exceed the proposed volumes of the two basins (i.e., basins are larger than the minimum volumes needed to detain onsite).

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) program and FIRMETTE[4] website, the Project site and immediate surrounding area are designated as FEMA Flood Zone X (FIRM Map Panel 06065C2070H dated 8/18/2014. This zone is defined as "Areas of 0.2-percent-annual-chance floodplain, areas of 1-percent-annual-chance (base flood) sheet flow flooding with average depths of less than 1 foot, areas of base flood stream flooding with a contributing drainage area of less than 1 square mile or areas protected from the base flood by levees." This zone is considered to have a low to moderate risk of flooding.

The proposed Project will not alter the existing drainage pattern onsite (i.e., to the north and west) but will maintain the existing offsite downstream drainage system through control of future discharges from the site through the infiltration basins which would prevent flooding onsite or offsite from occurring. The onsite drainage system will capture the incremental increase in runoff from the Project site associated with Project development.

[4] https://msc.fema.gov/portal/search?AddressQuery=city%20of%20menifee%2C%20CA

Surface runoff will be discharged in conformance with Riverside County and City of Menifee requirements and as described in the *WQMP*. Thus, the implementation of onsite drainage improvements and applicable requirements included in the *WQMP,* and the *Hydro Report* will ensure that stormwater runoff will not substantially increase the rate or volume of runoff in a manner that would result in substantial flooding on- or off-site. Impacts under this issue are considered less than significant with no mitigation required.

With implementation of the infiltration basins as part of the Project design, impacts related to the alteration of the existing drainage pattern in a manner that would result in on- or off-site flooding would be less than significant, and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.iii) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would 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?			**X**	

Less Than Significant Impact

The proposed Project will alter the site such that stormwater runoff will be increased but will not impact the existing off-site downstream drainage system through control of future discharges from the site. The planned system of drainage improvements and the infiltration basins will prevent runoff from the site from exceeding the capacity of existing or planned stormwater drainage systems and from providing substantial additional sources of polluted runoff. The *Hydro Report* and *WQMP* determined the planned infiltration basin will capture and pre-treat all runoff from the site.

This system is designed to capture the flows above the peak 100-year flow runoff from the Project site without development or otherwise be detained on site and discharged in conformance with Riverside County requirements. Without improvements, Project runoff may contain varying amounts of urban pollutants such as motor oil, antifreeze, gasoline, pesticides, trash, and fertilizers, could be introduced into downstream stormwater. However, the proposed Project is not anticipated to generate discharges that would require pollution controls beyond those already designed into the Project and/or required by the City as a standard operating procedure to meet water quality management requirements from the RWQCB.

The City and County have adopted stringent best management practices designed to control discharge of non-point source pollution that could result in a significant adverse impact to surface water quality. The City has identified BMPs that when implemented, can ensure that neither significant erosion and sedimentation, nor other water quality degrading impacts will occur as a result of developing the Project.

Compliance will also be ensured through fulfilling the requirements of a SWPPP and WQMP monitored by the City and the RWQCB. The SWPPP and WQMP must incorporate the BMPs that meet the City's performance standards for both construction and occupancy

stages of the Project. Thus, the implementation of onsite drainage improvements and applicable requirements will ensure that that drainage and stormwater will not create or contribute runoff that would exceed the capacity of existing or planned offsite stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts under this issue are considered less than significant and no mitigation is required.

The proposed Project would 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, in a manner which would 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. Any impacts would be less than significant.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.iv) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?			**X**	

Less Than Significant Impact

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) program and FIRMETTE[5] website, the Project site and immediate surrounding area are designated as FEMA Flood Zone X (FIRM Map Panel 06065C2070H dated 8/18/2014. This zone is defined as "Areas of 0.2-percent-annual-chance floodplain, areas of 1-percent-annual-chance (base flood) sheet flow flooding with average depths of less than 1 foot, areas of base flood stream flooding with a contributing drainage area of less than 1 square mile or areas protected from the base flood by levees." This zone is considered to have a low to moderate risk of flooding.

Due to the small size of the Project (1.0 acre of a 8.4 acre site) and scale of the planned improvements (3 new storage buildings in an area being used for unpermitted storage of large vehicles at present), development of this site is not anticipated to redirect or impede flood flows across the Project site, particularly given that surface flows on site will be directed to the onsite drainage features which will be capable of intercepting the peak 100-year flow rate from the Project site or otherwise be detained on site and discharged in conformance with City and Riverside County requirements.

With adherence to the Project *WQMP*, the Project would 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 substantial addition of impervious surfaces, in a manner which would impede or redirect flood flows. Any impacts will be less than significant, and no mitigation is required.

5 https://msc.fema.gov/portal/search?AddressQuery=city%20of%20menifee%2C%20CA

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	

No Impact

As discussed above, the Project site is located within Zone X which represents an area of not subject to flooding under 100-year project storm conditions. The Project site is located over 40 miles from the nearest coastline (Pacific Ocean) and at an elevation of 1,444 feet above sea level. Therefore, the risk to the site associated with tsunamis is minimal. Similarly, the Project site not located adjacent to or downstream of an impounded body of water that could fail and result in flooding of the Project site. Therefore, the site would not be subject to impacts by dam failure or seiches (standing waves in enclosed water bodies), therefore, the risk of seiche impacting the proposed Project is minimal. Based on the above, the risk of pollutant release, due to Project inundation caused by a flood, tsunami, or seiche is minimal and less than significant impacts are anticipated.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

Less Than Significant Impact

The Project *WQMP* has been prepared specifically to comply with the requirements of the City of Menifee and the County of Riverside for Ordinance No. 754.2 which includes the requirement for the preparation and implementation of a project-specific WQMP to address long-term water quality impacts. The Project must also provide a SWPPP to address potential surface water impacts during construction. The Project site is located in the Santa Ana River Watershed, within the jurisdiction of the Santa Ana Regional Water Quality Control Board, where discharges from Riverside County's Phase I MS4s are regulated through the Riverside County MS4 Permit (Order No. R8-2010-0033 NPDES No. CAS618033, as amended by Order No. R8-2013-0024) pursuant to section 402(p) of the Federal Clean Water Act.

The proposed commercial Project site overlies the San Jacinto Groundwater Basin[6] which is considered high priority by the Sustainable Groundwater Management Act (SGMA) and Department of Water Resources (DWR). However, the basin is not considered to be critically overdrafted and is currently being managed by the Hemet-San Jacinto Watermaster which was formed in 2013. A Groundwater Sustainability Plan (GSP) is required to be developed for this basin by 2022 and implemented by 2042. The GSP will document basin conditions and basin management will be based on measurable objectives and minimum thresholds defined to prevent significant and unreasonable impacts to the sustainability indicators defined in the GSP. Water consumption and effects in nearby basins indicates

[6] https://gis.water.ca.gov/app/bbat/

that the proposed Project's water demand is considered to be less than significant. By controlling water quality during construction and operations through implementation of both short- (SWPPP) and long- (WQMP) term best management practices at the site, no potential for conflict or obstruction of the Regional Board's water quality control plan has been identified.

The Project *WQMP* has been prepared specifically to comply with the requirements of the City and the NPDES Areawide Stormwater Program requiring the preparation of a WQMP. Implementation of the provisions of the *WQMP* will ensure that this plan is amended as appropriate to reflect up-to-date conditions on the site consistent with Riverside County's Municipal Storm Water Management Program and the intent of the NPDES Permit for Riverside County and the incorporated cities of Riverside County within the Santa Ana Region.

The Project site is located in the Santa Ana Region Watershed, within the jurisdiction of the Santa Ana Regional Board, where discharges from the City of Menifee/Riverside County's Phase I MS4s are regulated through the MS4 Permit (Order No. R8-2010-0036 NPDES Permit No. CAS618036), pursuant to Section 402(p) of the Federal Clean Water Act.

With adherence to, and implementation of the conclusions and recommendations set forth in the *WQMP,* the Project site development plan will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Any impacts will be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

11. LAND USE AND PLANNING.

Source(s): *Map My County*, (**Appendix A**); **Table 1, *Surrounding Land Uses***, and **Figure 6, *Aerial Photo***; **Figure 3, *General Plan Land Use Designations***, and **Figure 4**, ***Zoning Classifications***, provided in Section I. of this Initial Study; and *General Plan*.

Applicable General Plan Policies:

- **Goal LU-1:** Land uses and building types that result in a community where residents at all stages of life, employers, workers, and visitors have a diversity of options of where they can live, work, shop, and recreate within Menifee.
- **Policy LU-1.1:** Concentrate growth in strategic locations to help preserve rural areas, create place and identity, provide infrastructure efficiently, and foster the use of transit options.
- **Policy LU-1.4:** Preserve, protect, and enhance established rural, estate, and residential neighborhoods by providing sensitive and well-designed transitions (building design, landscape, etc.) between these neighborhoods and adjoining areas.
- **Policy LU-1.5:** Support development and land use patterns, where appropriate, that reduce reliance on the automobile and capitalize on multimodal transportation opportunities.
- **Policy LU-1.6:** Coordinate land use, infrastructure, and transportation planning and analysis with regional, county, and other local agencies to further regional and subregional goals for jobs-housing balance.
- **Policy LU-1.9:** Allow for flexible development standards provided that the potential benefits and merit of projects can be balanced with potential impacts.
- **Policy LU-2.1:** Promote infill development that complements existing neighborhoods and surrounding areas. Infill development and future growth in Menifee is strongly encouraged to locate within EDC areas to preserve the rural character of rural, estate, and small estate residential uses.
- **Goal ED-1:** A diverse and robust local economy capable of providing employment for all residents desiring to work in the City.
- **Policy ED-1.2:** Diversify the local economy and create a balance of employment opportunities across skill and education levels, wages and salaries, and industries and occupations.
- **Goal ED-2:** A variety of retail shopping areas distributed strategically throughout the City and regional retail, dining, and entertainment destinations in key locations with freeway access.
- **Policy ED-2.1:** Promote retail development by locating needed goods and services in proximity to where residents live to improve quality of life, retain taxable spending by Menifee residents, and attract residents from outside the City to shop in Menifee.
    - Locate businesses providing convenience goods and services in retail centers that are on arterials adjacent to neighborhoods and communities throughout the City but not in rural residential areas.
- **Policy ED-2.2:** Require regional retail districts to provide entertainment and dining in addition to retail sales and services to create destinations prepared to withstand e-commerce's increasing capture of retail spending. These districts should create a pedestrian-friendly human-scale atmosphere with street furniture, shading, and gathering spaces that enhance the experience of shopping and socializing.
  Local retail centers (primarily intended to serve Menifee residents) need not necessarily provide dining and entertainment but shall provide street furniture, shading, pedestrian-circulation, and gathering spaces that enhance the experience of shopping.

- **Goal ED-3:** A mix of land uses that generates a fiscal balance to support and enhance the community's quality of life.
- **Policy ED-3.1:** Incorporate short-term and long-term economic and fiscal implications of proposed actions into decision making.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?				**X**

No Impact

The proposed Project site is zoned Economic Development Corridor – Community Core (EDC-CC) and has a General Plan land use designation of EDC-CC. The proposed Project is consistent with both the General Plan land use and zoning designations on the site. The Project site is bounded to the north by Holland Road, to the west by Haun Road, to the east by a vehicle storage yard, and to the south by vacant land. All adjacent properties have zoning of EDC-CC.

The Zoning Code divides the City into districts, or zones, and regulates land use activity in each district by specifying the permitted uses of land and buildings, density, bulk, and other regulations. The proposed Project is consistent with the surrounding zoning and General Plan land use designations.

Additionally, the Project does not propose construction of any roadway, permanent flood control channel, or other structure that will physically divide any portion of the community. No impacts will occur.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction adopted for the purpose of avoiding or mitigating an environmental effect?				**X**

No Impact

The proposed Project is commercial in nature, the Project site is currently zoned for commercial uses, and the Project site is bordered on the north, west, and south by undeveloped commercial properties, and on the east by a vehicle storage yard.

The City's General Plan also contains goals and policies that are applicable to the proposed Project. These applicable goals and policies from the City's General Plan were listed above and are listed within the individual sections of this Initial Study (where applicable). The City, through exercising its independent review, has determined that

the proposed Project would be consistent with these applicable policies in the City's General Plan.

Therefore, the Project will not result in a land use significant environmental and use impact due to a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction adopted for the purpose of avoiding or mitigating an environmental effect. No impacts will occur.

Mitigation Measures

No mitigation measures are required.

12. MINERAL RESOURCES.

Source(s): *General Plan*; *GPEIR* (Chapter 5.11, *Mineral Resources*); and *Map My County* (**Appendix A**).

Applicable General Plan Policies:

- **Goal OSC-4:** Efficient and environmentally appropriate use and management of energy and mineral resources to ensure their availability for future generations.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				**X**

No Impact

The California Geological Survey Mineral Resources Project provides information about California's non-fuel mineral resources. The Mineral Resources Project classifies lands throughout the state that contain regionally significant mineral resources, as mandated by the Surface Mining and Reclamation Act (SMARA) of 1975. Non-fuel mineral resources include metals such as gold, silver, iron, and copper; industrial metals such as boron compounds, rare-earth elements, clays, limestone, gypsum, salt and dimension stone, and construction aggregate, including sand, gravel, and crushed stone. Development generally results in a demand for minerals, especially construction aggregate. Urban preemption of prime deposits and conflicts between mining and other uses throughout California led to passage of the SMARA, which requires all cities and counties to incorporate in their general plans the mapped designations approved by the State Mining and Geology Board.

The classification process involves the determination of Production-Consumption (P-C) Region boundaries, based on identification of active aggregate operations (Production) and the market area served (Consumption). The P-C regional boundaries are modified to include only those portions of the region that are urbanized or urbanizing and are classified for their aggregate content. An aggregate appraisal further evaluates the presence or absence of significant sand, gravel, or stone deposits that are suitable sources of aggregate. The classification of these mineral resources is a joint effort of the state and the local governments. It is based on geologic factors and requires that the State Geologist classify the mineral resources area as one of the four Mineral Resource Zones (MRZs), Scientific Resource Zones (SZ), or Identified Resource Areas (IRAs), described below:

- **MRZ-1:** A Mineral Resource Zone where adequate information indicates that no significant mineral deposits are present or likely to be present.
- **MRZ-2:** A Mineral Resource Zone where adequate information indicates that significant mineral deposits are present, or a likelihood of their presence and development should be controlled.

- **MRZ-3:** A Mineral Resource Zone where the significance of mineral deposits cannot be determined from the available data.
- **MRZ-4:** A Mineral Resource Zone where there is insufficient data to assign any other MRZ designation.
- **SZ Areas:** Containing unique or rare occurrences of rocks, minerals, or fossils that are of outstanding scientific significance shall be classified in this zone.
- **IRA Areas:** County or State Division of Mines and Geology Identified Areas where adequate production and information indicates that significant minerals are present.

As part of the classification process, an analysis of site-specific conditions is utilized to calculate the total volume of aggregates within individually identified Resource Sectors. Resource Sectors are those MRZ-2 areas identified as having regional or statewide significance. Anticipated aggregate demand in the P-C Regions for the next 50 years is then estimated and compared to the total volume of aggregate reserves identified within the P-C Region.

The City of Menifee is in the San Bernardino P-C Region, in which aggregate mineral resource zones were last mapped by the California Geological Survey in 2008. The following MRZs are mapped in the City of Menifee (reference Figure 5.11-1, Mineral Resource Zones of the *GPEIR*).

- MRZ-1: 308 acres in northwest part of City near the northwest corner of Sun City.
- MRZ-3: 22,017 acres, almost three-quarters of the City. Most of the eastern, southern, and northwestern parts of the City are designated MRZ-3.
- Urban Area: 7,488 acres consisting of most of the central and north-central and parts of the western portion of the City. Urban areas are not defined as mineral resource zones because mining in these areas is already precluded by urban development.

As stated in the *GPEIR*, no known significant mineral resources have been designated in the City of Menifee. The Project site is located in Mineral Resource Zone 3.

The Project site is located south of Holland Road and east of Haun Road in the City of Menifee, County of Riverside, State of California. The Project site is bordered on the north by Holland Road, beyond which is vacant commercial land, on the south and west by vacant commercial land, and on the east by a vehicle storage yard. All adjacent lands are designated Economic Development Corridor – Community Core.

There are no mineral extraction or process facilities on or near the site. No mineral resources are known to exist within the vicinity. No impacts will occur.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				**X**

No Impact

Please reference the discussion in Threshold 12.a. There are no mineral extraction or process facilities on or near the site. No mineral resources are known to exist within the vicinity. No impacts will occur.

Mitigation Measures

No mitigation measures are required.

13. NOISE.

Source(s): *General Plan*; City of Menifee Municipal Code; and Google Maps.

Applicable General Plan Policies:

- **Goal N-1:** Noise-sensitive land uses are protected from excessive noise and vibration exposure.
  - **Policy N-1.1:** Assess the compatibility of proposed land uses with the noise environment when preparing, revising, or reviewing development project applications.
  - **Policy N-1.2:** Require new projects to comply with the noise standards of local, regional, and state building code regulations, including but not limited to the City's Municipal Code, Title 24 of the California Code of Regulations, the California Green Building Code, and subdivision and development codes.
  - **Policy N-1.3:** Require noise abatement measures to enforce compliance with any applicable regulatory mechanisms, including building codes and subdivision and zoning regulations, and ensure that the recommended mitigation measures are implemented.
  - **Policy N-1.7:** Mitigate exterior and interior noises to the levels listed in the table below to the extent feasible, for stationary sources adjacent to sensitive receptors:

Stationary Noise Standards

Land Use	Interior Standards	Exterior Standards
Residential 10:00 p.m. to 7:00 a.m. 7:00 a.m. to 10:00 p.m.	 40 Leq (10 minute) 55 Leq (10 minute)	 45 Leq (10 minute) 65 Leq (10 minute)

  - **Policy N-1.8:** Locate new development in areas where noise levels are appropriate for the proposed uses. Consider federal, state, and City noise standards and guidelines as a part of new development review.
  - **Policy N-1.9:** Limit the development of new noise-producing uses adjacent to noise-sensitive receptors and require that new noise-producing land be are designed with adequate noise abatement measures.
  - **Policy N-1.11:** Discourage the siting of noise-sensitive uses in areas in excess of 65 dBA CNEL without appropriate mitigation.
  - **Policy N-1.13:** Require new development to minimize vibration impacts to adjacent uses during demolition and construction.
- **Goal N-2:** Minimal Noise Spillover. Minimal noise spillover from noise-generating uses, such as agriculture, commercial, and industrial uses into adjoining noise-sensitive uses.

City of Menifee Municipal Code Section 9.09.050:

The Project site is within the City of Menifee and bounded by vacant land to the north, west, and south, the I-215 Freeway to the east, and residential subdivisions further to the west and northwest. The City of Menifee Municipal Code Section 9.09.050 (Noise Control Regulations) establishes the permissible noise level that may intrude into a neighbor's property. The Municipal Code establishes the exterior noise level criteria for residential properties affected by stationary noise sources. For residential properties, the exterior noise level shall not exceed 65 dBA Leq during daytime hours (7:00 a.m. to 10:00 p.m.) and shall not exceed 45 dBA Leq during the nighttime hours (10:00 p.m. to 7:00 a.m.). In addition, the City's General Plan references the state *Land Use Compatibility for Community Noise Environments* that indicates noise levels at residential uses are *normally acceptable* up to 60 dBA CNEL and *conditionally acceptable* up to 70 dBA CNEL and at commercial uses are *normally acceptable* up to 70 dBA CNEL and *conditionally acceptable* up to 77.5 dBA CNEL.

Fundamentals of Sound and Environmental Noise:

Sound consists of energy waves that people receive and interpret while noise can be defined as unwanted sound. Sound pressure levels are described in logarithmic units of ratios of sound pressures to a reference pressure, squared. These units are called bels. In order to provide a finer description of sound, a bel is subdivided into ten decibels, abbreviated dB. To account for the range of sound that human hearing perceives, a modified scale is utilized known as the A-weighted decibel (dBA). Since decibels are logarithmic units, sound pressure levels cannot be added or subtracted by ordinary arithmetic means. For example, if one automobile produces a sound pressure level of 70 dBA when it passes an observer, two cars passing simultaneously would not produce 140 dBA. In fact, they would combine to produce 73 dBA. This same principle can be applied to other traffic quantities as well. In other words, doubling the traffic volume on a street or the speed of the traffic will increase the traffic noise level by 3 dBA. Conversely, halving the traffic volume or speed will reduce the traffic noise level by 3 dBA. A 3 dBA change in sound is the beginning at which humans generally notice a barely perceptible change in sound and a 5 dBA change is generally readily perceptible. It should also be noted that a 3 dBA increase in noise from traffic requires a doubling of the traffic volume over the existing level before the human ear can sense the increase.

Noise consists of pitch, loudness, and duration; therefore, a variety of methods for measuring noise have been developed. According to the California General Plan Guidelines for Noise Elements, the following are common metrics for measuring noise:

- **L_{eq} (Equivalent Energy Noise Level):** The sound level corresponding to a steady-state sound level containing the same total energy as a time-varying signal over given sample periods. LEQ is typically computed over 1-, 8-, and 24-hour sample periods.

- **CNEL (Community Noise Equivalent Level):** The average equivalent A-weighted sound level during a 24-hour day, obtained after addition of five decibels to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and after addition of ten decibels to sound levels in the night from 10:00 p.m. to 7:00 a.m.

- **L_{DN} (Day-Night Average Level):** The average equivalent A-weighted sound level during a 24- hour day, obtained after the addition of ten decibels to sound levels in the night after 10:00pm and before 7:00 a.m.

CNEL and L_{DN} are utilized for describing ambient noise levels because they account for all noise sources over an extended period of time and account for the heightened sensitivity of people to noise during the night. L_{eq} is better utilized for describing specific and consistent sources because of the shorter reference period.

Existing Noise Levels

The closest sensitive receptors to the Project site are residential units 1,050 feet east of the I-215 Freeway so the freeway would have a much more substantial influence on noise impacts on those receptors than the Project. There are additional residential uses 1,700 feet west and northwest of the site which would be considered the closest sensitive receptors to the site. Due to the site's rural location and lack of adjacent sensitive land uses, no noise study was performed for the Project. The surrounding area has noise levels typical of rural/suburban areas in western Riverside County including other areas of Menifee. Typical noise levels in these areas are relatively low due to the low intensity of land uses (including vacant land), narrow roads (i.e., Holland Road and Haun Road), and relatively low levels of

traffic. However, noise levels in the Project area are dominated by traffic along the I-215 Freeway 740 feet east of the site.

Analysis of Project Effect and Determination of Significance:

Would the Project result in?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 or noise ordinance, or applicable standards of other agencies?			**X**	

Less Than Significant Impact

Construction Noise

The degree of construction noise may vary for different areas of the Project site and also vary depending on the construction activities. Noise levels associated with the construction will vary with the different phases of construction. The US Environmental Protection Agency (EPA) has compiled data regarding the noise generated characteristics of typical construction activities. The data is presented in **Table 13-1, *Typical Construction Noise Levels***.

Table 13-1
Typical Construction Noise Levels[1]

Type	Noise Levels (dBA) at 50 Feet
Earth Moving	
Compactors (Rollers)	73 - 76
Front Loaders	73 - 84
Backhoes	73 - 92
Tractors	75 - 95
Scrapers, Graders	78 - 92
Pavers	85 - 87
Trucks	81 - 94
Materials Handling	
Concrete Mixers	72 - 87
Concrete Pumps	81 - 83
Cranes (Movable)	72 - 86
Cranes (Derrick)	85 - 87
Stationary	
Pumps	68 - 71
Generators	71 - 83
Compressors	75 - 86

Impact Equipment

Type	Noise Levels (dBA) at 50 Feet
Saws	71 - 82
Vibrators	68 - 82

[1] Referenced Noise Levels from the Environmental Protection Agency (EPA) for equipment powered by internal combustion engines.
Source: US Environmental Protection Agency

Construction noise is considered a short-term impact and would be considered significant if construction activities occur outside the allowable times as described in Section 9.09.030 of the City's Municipal Code. Existing residences over a thousand feet to the west and northwest may be temporarily affected by short-term noise impacts associated the transport of workers, the movement of construction materials to and from the Project site, ground clearing, excavation, and building activities. Construction for the Project will be relatively limited due to the small size of the planned development area (site is 8.84 gross acres but construction area is less than 2 acres), low intensity of planned improvements (asphalt drive aisles and mainly single-story block/metal buildings), and the fact the site is already developed with a similar low intensity use (i.e., self-storage units).

Typical noise sources and noise levels associated with construction activities are shown in **Table 13-1**. However, the type of construction necessary for this Project will be relatively low intensity compared by typical construction of larger facilities. Typical operating cycles for these types of construction equipment may involve just one or two minutes of full power operation followed by three to four minutes at lower power settings. Noise levels will be loudest during excavation. Onsite work will utilize at minimum a backhoe and potentially a front-loader at the same time which would be the loudest equipment expected to be used during Project construction. Noise levels associated with such equipment will have a noise level of 90 dBA at 50 feet from the equipment. However, it should be noted the City considers construction noise exempt as long as it occurs within the hours allowed under the Municipal. This is considered regulatory compliance and not unique mitigation for the Project.

Construction will not occur within a quarter mile of existing residences to the west and the existing residences to the east are across the I-215 Freeway from the Project site. Therefore, construction noise levels at the closest sensitive receptors to the west and northwest will be below the City's 65 dBA daytime limit. With compliance with the hourly limits of construction in the City's Municipal Code, potential construction-related noise impacts of the Project will be less than significant, and no mitigation is required.

Onsite Operational Noise

Due to the type of land use involved (i.e., self-storage), operation of the Project will not result in significant amounts of traffic either on or offsite or any activities that would generate high noise levels beyond the boundaries of the site. At present the storage activities on the site (27887 Holland Road) operate Monday through Sunday 8 AM to 6 PM, and there are no significant noise impacts from those operations (i.e., the City has had no noise complaints from that facility). It should be noted the other existing use on the site, the U-Haul Rental Facility (27887 Holland Road #200), currently operates Monday through Sunday 10 AM to 4 PM. It is assumed the additional storage activities will have similar hours to the existing use, therefore, no significant noise impacts are expected from the proposed Project as well.

With implementation of the same hours of operation on the new storage uses, long-term operational noise impacts of the Project will be maintained at less than significant levels and no mitigation is required.

Would the Project result in?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Generation of excessive groundborne vibration or groundborne noise levels?			**X**	

Less Than Significant Impact

Construction activities can produce vibration that may be felt by adjacent land uses. The construction of the proposed Project would not require the use of equipment such as pile drivers, which are known to generate substantial construction vibration levels. The primary vibration source during construction would most likely be from a bulldozer. A large bulldozer has a vibration impact of 0.089 inches per second peak particle velocity (PPV) at 25 feet which is perceptible but below any risk of architectural damage. The thresholds from the Caltrans Transportation and Construction Induced Vibration Guidance Manual in **Table 13-2, *Vibration Damage Threshold Criteria***, provides general guidelines as to the vibration damage potential to various types of structures.

Table 13-2
Vibration Damage Threshold Criteria

Structure and Condition	Maximum PPV (in/sec)[1]	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: Caltrans Transportation and Construction Induced Vibration Guidance Manual
[1] Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Table 13-3, *Vibration from Construction Equipment*, gives approximate vibration levels for particular construction activities. This data provides a reasonable estimate for a wide range of soil conditions. At a distance of 1,000 feet, a large bulldozer would yield a worst-case vibration of 0.002 PPV (in/sec), which is well below the perception of vibration or any impact threshold. Since sensitive receptors in the Project area are more than 1,000 feet from the site, potential vibration impacts will be less than significant, and no mitigation is required.

Table 13-3
Vibration from Construction Equipment

Equipment	Peak Particle Velocity (inches/second) at 25 feet	Approximate Vibration (dVB) at 25 feet
Vibratory Roller	0.21	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

Source: Caltrans Transportation and Construction Induced Vibration Guidance Manual

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?				**X**

No Impact

The closest airport facility to the Project site is French Valley Airport approximately 6.4 miles southeast of the site. The site is not within two miles or the Airport Land Use Plan of this facility. There are also no established airstrips within two miles of the Project site. Therefore, there will be no noise-related impacts from these facilities, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

14. POPULATION AND HOUSING.

Source(s): *General Plan*; *GPEIR* (Chapter 5.13, *Population and Housing)*; Google Maps; *Map My County* (**Appendix A**); Department of Finance Population Estimates; Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS); and **Figure 6, *Aerial Photo*** in Section I. of this Initial Study.

Applicable General Plan Policies:

N/A

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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)?			**X**	

Less Than Significant Impact

According to the Department of Finance Population Estimates, the City of Menifee had a population of 97,093 as of January 1, 2020. The Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Adopted Growth Forecast projects an estimated population of 132,101 by the year 2040. According to the SCAG RTP/SCS, Menifee had an employment base of 13,840 in 2016 and is projected to increase to 21,160 by the year 2040. The Project is consistent with the General Plan Land Use designation and zoning classification for the site. Any direct increases in population as a result of the Project are insignificant as they are within the growth assumptions estimated by SCAG for the City of Menifee General Plan. No new expanded infrastructure is proposed that could accommodate additional growth in the area that is not already possible with existing infrastructure. Impacts will be less than significant.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				**X**

No Impact

The Project site is currently developed with commercial uses. There is no existing housing (or residents) on the Project site. The Project will not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. No impacts will occur.

Mitigation Measures

No mitigation measures are required.

15. PUBLIC SERVICES.

Source(s): *GPEIR* (Chapter 5.14, *Public Services*); *General Plan*; *Map My County* (**Appendix A**); Google Earth; Menifee Resolution No. 22-1169 (Development Impact Fees); Menifee Municipal Code Chapter 8.20 (Fire Code); Menifee Union School District website; and Perris Union High School District website.

Applicable General Plan Policies:

- **Goal S-4:** A community that has effective fire mitigation and response measures in place, and as a result is minimally impacted by wildland and structure fires.
- **Policy S-4.1:** Require fire-resistant building construction materials, the use of vegetation control methods, and other construction and fire prevention features to reduce the hazard of wildland fire.
- **Policy S-4.2:** Ensure, to the maximum extent possible, that fire services, such as firefighting equipment and personnel, infrastructure, and response times, are adequate for all sections of the City.
- **Policy S-4.4:** Review development proposals for impacts to fire facilities and compatibility with fire areas or mitigate.
- **Goal OSC-1:** A comprehensive system of high quality parks and recreation programs that meets the diverse needs of the community.
- **Policy OSC-1.7:** Ensure that parks and recreational facilities are well-maintained by the responsible agency.

Analysis of Project Effect and Determination of Significance:

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered 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 public services:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Fire protection?			**X**	

Less Than Significant Impact

The City of Menifee contracts for fire services with the Riverside County Fire Department/CAL FIRE, providing a full range of fire protection services including fires, rescues, traffic accidents, medical emergencies, and requests for general public assistance.

The Menifee Station, Station #68, is located approximately 3.6 miles southwest of the Project site at 26020 Wickerd Road.

The proposed Project is anticipated to require additional fire protection; however, since the Project is consistent with the General Plan, the impacts are viewed as less than significant.

Prior to the issuance of building permits all construction documents will be reviewed and approved by the City of Menifee's Fire Department as contracted through Riverside County Fire for consistency with the California Fire Code. The development will be required to provide fully operational fire suppression equipment, including hydrants, prior to the arrival of any building material being delivered to the Project site. The proposed structures will have fire sprinklers throughout the buildings as well as a dedicated fire protection water line.

The Project site is subject to Resolution No. 22-1169, Development Impact Fees (DIF). DIF shall be paid at the time a building permit is issued for the Development Project. DIF is used to pay for Fire protection services. Payment of the DIF is a standard condition and is not considered unique mitigation under CEQA. Additional commercial development into this area will not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 protection. Any impacts are considered less than significant impact.

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered 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 public services:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
b) Police protection?			**X**	

Less Than Significant Impact

On July 1, 2020, the Menifee Police Department (MPD) officially entered service with over 60 officers and 17 professional staff. Accordingly, the MPD is headquartered at 29714 Haun Road. The City currently has 91 sworn officers and 27 professional staff (total 118 staff). The City of Menifee is divided into 4 "beats" for purposes of patrols, and this Project is in Beat 3.

This Project is an expansion of an existing commercial facility and may require additional police services. However, the Project itself is not expected to adversely affect police services as it is consistent with General Plan; therefore, it is consistent with Population Projections.

The City development review process and building permit plan check process include review by the Police Department to ensure incorporation of defensible space concepts in site design and construction. All developments are required to incorporate defensible space concepts, and that the design of each site be reviewed with the Sheriff's Department prior to approval of conditional use permits or other entitlements.

The Project site is subject to Resolution No. 22-1169, Development Impact Fees (DIF). DIF shall be paid at the time a building permit is issued for the Development Project. DIF is used to pay for police protection services.

Per Menifee Municipal Code Chapter 8.02 (DIF), new development is required to pay impact fees that can go toward purchasing land and construction of new police service facilities. Payment of the DIF is a standard condition and is not considered unique mitigation under. Additional commercial development into this area will not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 police protection. Any impacts are considered less than significant impact.

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered 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 public services:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
c) Schools?			**X**	

Less Than Significant Impact

The proposed Project is located within the Menifee Union School District (MUSD) and Perris Union High School District (PUHSD). The proposed Project is subject to development fees for school facilities pursuant to Senate Bill 50. Payment of these fees are a standard condition and are not considered unique mitigation under CEQA. The commercial rate is lower than the residential rate, as commercial developments do not place a large demand on school facilities. With the payment of these development fees, less than significant impacts will occur.

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered 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 public services:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
d) Parks?			**X**	

No Impact

Demand for park and recreational facilities are generally the direct result of residential development because it generates new residents or population. Since the Project is commercial in nature, it is not expected to generate new residents or population. New and expanded commercial properties are not subject to the payment of Quimby fees.

Since the Project is commercial nature, the Project will not increase the use of existing neighborhood and regional parks or other recreational facilities to the degree that substantial physical deterioration of the facility would occur or be accelerated. Impacts

will be less than significant.

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered 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 public services:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Other public facilities?			X	

Less Than Significant Impact

The expansion of public services such as libraries or hospitals will not be required. The proposed development will result in an incremental, yet not significant increase the demand of such services.

As the City's population grows, new medical facilities will be required to provide health and medical services for an expanded population. Since the Project as proposed is consistent with the existing City's General Plan Land Use Plan designation of Economic Development Corridor – Community Core (EDC-CC), the proposed Project would not impact the City/County-wide health and medical facilities to a greater degree than was anticipated in the General Plan.

As the City's population grows, new library facilities will be required to provide services for an expanded population. Since the Project as proposed is commercial in nature, it would not impact city library facilities.

A less than significant impact will occur to libraries and health services as a result of the Project.

Mitigation Measures

No mitigation measures are required.

16. RECREATION.

Source(s): *General Plan*; *GPEIR* (Chapter 5.16, *Recreation)*; Municipal Code Sections 9.55 and 9.56; and Development Impact Fees per Resolution No. 22-1169.

Applicable General Plan Policies:

N/A.

Analysis of Project Effect and Determination of Significance:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			**X**	

Less Than Significant Impact

Demand for park and recreational facilities are generally the direct result of residential development because it generates new residents or population. Goal OCS-1.2 of the City of Menifee General Plan states that it is the City's requirement to achieve 5 acres of parkland for every 1,000 city residents. Given the commercial nature of the Project, it is not anticipated to expand the City's population.

The Project proposes uses that are consistent with the General Plan land use and zoning designation for the site.

The proposed Project will not include recreational facilities, nor will it result in the increased use of existing neighborhood and regional parks. However, commercial developments may incrementally increase indirect impacts to park facilities via the increased number of employees who may live locally. This incremental increase in demand for recreation areas will be offset via payment of applicable Park and Recreation Facilities development impact fees; therefore, impacts will be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			**X**	

Less Than Significant Impact

As discussed in Threshold 12.a, demand for park and recreational facilities are generally the direct result of residential development because it generates new residents or population. Given the commercial nature of the Project, it will not include recreational

facilities, and will not require the construction or expansion of recreational facilities. However, commercial developments may incrementally increase indirect impacts to park facilities via the increased number of employees who may live locally. This incremental increase in demand for recreation areas will be offset via payment of applicable Park and Recreation Facilities development impact fees; therefore, impacts will be less than significant.

Mitigation Measures

No mitigation measures are required.

17. TRANSPORTATION.

Source(s): *City of Menifee General Plan, Circulation Element*; Ordinance No. 2009-62 "Western Riverside County Transportation Uniform Mitigation Fee Program Ordinance of 2009"; *StaxUP Storage Expansion Project Trip Generation & Vehicle Miles Traveled (VMT) Study, City of Menifee,* prepared by RK Engineering Group, Inc., 5-31-2022 (*VMT Memo*, **Appendix F**); *City of Menifee Transit and Bicycle/Pedestrian Maps* (Circulation Element Exhibits C-5 and C-6); **Table 1, *Surrounding Land Uses*** in Section I. of this Initial Study; **Figure 3, *General Plan Land Use Designations***, **Figure 4, *Zoning Classifications***, and **Figure 6, *Aerial Photo***, in Section I. of this Initial Study; *City of Menifee Traffic Impact Analysis Guidelines for Vehicle Miles Traveled,* prepared by Fehr & Peers, 6-3-2020); and Riverside Transit Agency website.

Applicable General Plan Policies:

- **Goal C-1:** A roadway network that meets the circulation needs of all residents, employees, and visitors to the City of Menifee.
- **Policy C-1.1:** Require roadways to:
    - Comply with federal, state and local design and safety standards.
    - Meet the needs of multiple transportation modes and users.
    - Be compatible with the streetscape and surrounding land uses.
    - Be maintained in accordance with best practices.
- **Policy C-1.2:** Require development to mitigate its traffic impacts and achieve a peak hour Level of Service (LOS) D or better at intersections, except at constrained intersections at close proximity to the I-215 where LOS E may be permitted.
- **Policy C-1.5:** Minimize idling times and vehicle miles traveled to conserve resources, protect air quality, and limit greenhouse gas emissions.
- **Goal C-2:** A bikeway and community pedestrian network that facilitates and encourages nonmotorized travel throughout the City of Menifee.
- **Policy C-2.1:** Require on- and off-street pathways to:
    - Comply with federal, state and local design and safety standards.
    - Meet the needs of multiple types of users (families, commuters, recreational beginners, exercise experts) and meet ADA standards and guidelines.
    - Be compatible with the streetscape and surrounding land uses.
    - Be maintained in accordance with best practices.
- **Policy C-2.2:** Provide off-street multipurpose trails and on-street bike lanes as our primary paths of citywide travel, and explore the shared use of low speed roadways for connectivity wherever it is safe to do so.
- **Policy C-2.3:** Require walkways that promote safe and convenient travel between residential areas, businesses, schools, parks, recreation areas, transit facilities, and other key destination points.
- **Policy C-2.4:** Explore opportunities to expand the pedestrian and bicycle networks; this includes consideration of utility easements, drainage corridors, road rights-of-way and other potential options.
- **Goal C-3:** A public transit system that is a viable alternative to automobile travel and meets basic transportation needs of the transit dependent.
- **Policy C-3.2:** Require new development to provide transit facilities, such as bus shelters, transit bays, and turnouts, as necessary.
- **Goal C-5:** An efficient flow of goods through the City that maximizes economic benefits and minimizes negative impacts.

- **Policy C-5.3:** Support efforts to reduce/eliminate the negative environmental impacts of goods movement.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			**X**	

Less Than Significant Impact

Vehicular trip generation represents the amount of traffic that is attracted and produced by a development. It is typically estimated based on the trip generation rates from the latest *Institute of Transportation Engineers (ITE) Trip Generation Manual.* A detailed trip generation and vehicle miles traveled memorandum (*VMT Memo)* was prepared for the Project using the current version of the ITE Manual (11th Edition, 2021). The Project proposes a self-storage facility with a total building area of approximately 48,725 square feet and the *VMT Memo* used ITE Land Use Category 151: Mini-Warehouse as the most appropriate trip rates for this land use. The *VMT Memo* indicated the proposed Project would generate approximately 71 total daily trips with 5 trips in the AM peak hour and 7 trips in the PM peak hour.

The *City of Menifee Traffic Impact Analysis Guidelines,* dated January 2019, specifies that a project that generates less than 50 peak hour trips is not required to prepare a traffic analysis and a trip generation memo will be considered sufficient documentation of potential traffic impacts. Based on its trip generation (i.e., 71 daily trips, 5 AM peak hour trips, and 7 PM peak hour trips), the proposed Project is not required to prepare a traffic impact analysis and is not expected to result in any significant adverse impacts on the operations of the local roadways and intersections.

The CEQA thresholds of significance for transportation and traffic impacts have shifted in recent years. In the past, the CEQA analysis focused on Level of Service (LOS) which measures congestion at local intersections and roadway segments. The emphasis of past studies was to assure the street grid network functioned well and allowed for efficient movement of vehicles. The current focus is to encourage active transportation (e.g., pedestrians, bicyclists, etc.) and transit, and to limit increases in Vehicle Miles Travelled (VMT). An important part of this analysis is to determine if a proposed action is consistent with both the vehicular and non-vehicular aspects of the Circulation Element of the General Plan.

Transit. Bus service in western Riverside County is provided by the Riverside Transit Authority (RTA). The Project area is currently rural in nature and not served by any existing RTA Routes. The closest bus route to the Project area is Routes 40 and 61 along Newport Road one mile north of the site at Haun Road and Route 208 along the I-215 Freeway although this is an express route with limited access points. According to the RTA's website, there are no bus stops in the immediate Project area. However, the City's General Plan, Circulation Element, Exhibit C-5, Potential Transit Services, identifies Haun Road for "Potential Future On-Road Transit Service". Therefore, at some point in the future the Project area will have access to transit service.

Bicycle and Pedestrian Trails. The Project area currently has no on- or off-road bicycle routes, trails, or sidewalks other than those internal to residential subdivisions to the west and northwest. According to the City's General Plan, Circulation Element, Exhibit C-6, Proposed Bikeway and Community Pedestrian Network, Haun Road is planned to eventually have a Class I Community Off-Road Bike Trail and Hollard Road will have Class II On-Street Bike Lanes. Therefore, at some point in the future the Project area will have access to both bicycle and pedestrian access networks.

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 includes Winchester Road adjacent to the Project site in the CMP.

The RCTC CMP does not require traffic impact assessments for development proposals. However, local agencies maintain the minimum 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. In addition, an individual project could conflict with the CMP if it were to cause the CMP facility to operate at an unacceptable LOS.

The City has standard conditions of approval that will require the Project to pay the County's Transportation Uniform Mitigation Fee (TUMF) and the City's Development Impact Fee (DIF) assessed on all new development which collectively help reduce overall impacts to the transportation system (i.e., roads and intersections). Compliance with these standard conditions is considered regulatory compliance and not separate mitigation under CEQA.

The *VMT Memo* estimates the Project will generate 5 AM peak hour trips, 7 PM peak hour trips, and 71 total daily trips or average daily traffic (ADT). According to the City's *Traffic Impact Analysis Guidelines*, the Project will meet the City's General Plan LOS standard with implementation of planned onsite improvements and payment of TUMF, DIF and Traffic Signal Mitigation Fees.

Some of the vehicle trips generated by the development on the Project site will connect to the CMP network. For example, future site access to the StaxUp Storage self-storage facility would be via two full-access unsignalized driveways located along a future frontage road which will be constructed as part of the future Holland Road Overpass project (over the I-215 Freeway which is a CMP and TUMF roadway). However, the Project's small traffic increase is incremental and is not considered cumulatively considerable due to the relatively small percentage increase in regional trips it represents, and all Project-level impacts are mitigated to less than significant levels.

Summary. The proposed Project is non-residential in nature so it will not directly generate new residents who will want to take regular advantage of non-vehicular transportation. However, employees of the proposed Project will be able to take advantage of these non-vehicular transportation options (i.e., sidewalks, bicycle lanes, or transit) in the future if they so choose, although using them as a replacement for commuting will only be possible if an employee lived within a convenient distance to the

Project site. Based on the availability of non-vehicular transportation options, the proposed Project will not conflict with applicable program, plan, or ordinance on the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, the Project will have less than significant impacts in this regard and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?			X	

Less Than Significant Impact

In the fall of 2013, SB 743 was passed by the state legislature and signed into law by the governor. SB 743 requires that congestion or delay-based metrics such as roadway capacity and LOS will no longer be the performance measures used for the determination of the transportation impacts of projects in studies conducted under CEQA. Instead, VMT will be used.

The California Governor's Office of Planning and Research (OPR) issued a Technical Advisory in December 2018 which described their recommended procedures and methodology for VMT analysis. A key element of SB 743, signed in 2013, is the elimination of automobile delay and LOS as the sole basis of determining California Environmental Quality Act (CEQA) impacts. Pursuant to CEQA guidelines, Section 15064.3, VMT is the most appropriate measure of transportation impacts.

Consistent with the recommendations of the *City of Menifee Traffic Impact Analysis Guidelines for Vehicle Miles Traveled*, screening thresholds may quickly identify whether or not a project should be expected to have a less than significant impact without conducting a detailed project-level assessment.

The City's guidelines indicate that the following three types of screening criteria can be applied to effectively screen projects from project-level assessment: Step 1: Transit Priority Area (TPA) Screening; Step 2: Low VMT Area Screening; and Step 3: Project Type Screening. Any of these three criteria can be utilized to screen out a project from project-level VMT assessment. In this case, Step 3: Project Type Screening criteria is most applicable for this proposed Project.

Local-serving projects, including retail projects less than 50,000 square feet, are presumed to have a less than significant impact absent substantial evidence to the contrary. Local serving retail generally improves the convenience of shopping close to home and has the effect of reducing vehicle travel.

In addition to local serving retail, the following local serving uses can also be presumed to have a less than significant impact absent substantial evidence to the contrary as their uses are local serving in nature:

- Local-serving K-12 schools
- Local parks
- Day care centers

- Local-serving retail uses less than 50,000 square feet Gas stations
  - Banks
  - Restaurants
  - Shopping Center
- Local-serving hotels (e.g., non-destination hotels)
- Student housing projects on or adjacent to college campuses
- Local-serving assembly uses (places of worship, community organizations)
- Community institutions (Public libraries, fire stations, local government)
- Local serving community colleges that are consistent with the assumptions noted in the RTP/SCS
- Affordable or supportive housing
- Assisted living facilities
- Senior housing (as defined by US HUD)
- Project generating less than 110 daily trips
  - This generally corresponds to the following "typical" development potentials:
    - 11 single family housing units
    - 16 multi-family, condominiums, or townhouse housing units
    - 10,000 square feet of office
    - 15,000 square feet of light industrial
    - 63,000 square feet of warehousing
    - 79,000 square feet of high cube transload and short-term storage warehouse

As stated in Threshold 17.a, the proposed Project consists of a self-storage facility with 48,725 square feet of building which will generate 71 total daily trips which is less than the 110 daily trip threshold in the City's Guidelines. As a result, the proposed Project is screened out based on Step 3: Project Type Screening and will have a less than significant impact on VMT under CEQA. In addition, the City's Guidelines state that no further VMT analysis is required if a project meets one or more of the screening criteria.

For these reasons, the Project would have less than significant impacts related to VMT, and no mitigation is required.

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

Less Than Significant Impact

The Project site is the existing StaxUp Storage self-storage facility located near the southeast corner of Haun Road and Holland Road in the City of Menifee. This intersection is currently a four-way stop due to the low level of traffic in this rural area. Holland Road has a linear alignment in the vicinity of the Project site and dead ends 330 feet east of the Project site and 440 feet west of the I-215 Freeway. Haun Road is a rural

two-lane road running north-south just west of the site and has a linear alignment north of Holland Road and a shallow curvilinear alignment south of Holland Road (i.e., gentle curve 200 feet to the west over 2,000 feet of roadway). The north end of the property is currently being used for temporary, unpermitted storage of large vehicles.

Current access to the Project site is provided via one full access unsignalized driveway located along Holland Road. With the proposed expansion of the StaxUp Storage self-storage facility, future site access would be via two full access unsignalized driveways located along a future frontage road which will be constructed as part of the future Holland Road Overpass project. None of the existing or future roadways, driveways, etc. would cause dangerous traffic conditions. The Project area is still relatively rural although land uses surrounding the site include several suburban residential subdivisions to the southwest and west and a commercial center to the north. There are vacant parcels both north and south of the site and some indication of ongoing farming to the north.

The Project has been reviewed by City Traffic Engineering Staff, and as designed, will not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Project driveway intersections and internal circulation are safe. Adequate sight distance has been provided. Driveway widths will accommodate Project traffic, and stop signs are provided where necessary for entering and exiting the site. No incompatible uses (e.g., farm equipment) are located in proximity to the Project, although the surrounding vacant lands are regularly disked for weed abatement.

In addition, street improvement plans will be subject to City review and approval which will ensure that Project driveway intersections and internal circulation are safe, with adequate sight distance, driveway widths and stop signs where necessary for entering and exiting the site. This will eliminate any Project impacts due to a design feature. Any impacts will be less than significant, and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in inadequate emergency access?			X	

Less Than Significant Impact

A limited potential exists to interfere with an emergency response or evacuation plan during construction. Construction work along Holland Road or Haun Road will be limited to site adjacent road improvements and protecting or moving utility connections. Project-related work may require limited to nominal traffic diversion, signs, or cones as appropriate. 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 City Condition of Approval (COA) and is not considered unique mitigation under CEQA. Following construction, emergency access to the Project site and area will remain as it was prior to the proposed Project. Any impacts during construction are considered less than significant.

The proposed Project is required to comply with Fire Department requirements for adequate access. Project site access and circulation will provide adequate access and

turning radius for emergency vehicles, consistent with the Fire Department's requirements. Any impacts during construction are considered less than significant.

Mitigation Measures

No mitigation measures are required.

18. TRIBAL CULTURAL RESOURCES.

Source(s): Native American Consultation records from City staff; Assembly Bill (AB) 52; Public Resources Codes; *Holland Road/Interstate 215 Overcrossing Project, County of Riverside, Initial Study with Mitigated Negative Declaration*, prepared by the City of Menifee, 7-30-2016 (*Holland Road Overpass MND*, **Appendix D**); *Historical Resources Compliance Report, Holland Road/Interstate 215 Overcrossing Project, City of Menifee*, prepared by ICF International, 3-11-2015 (*Historical Report*, **Appendix I**); and City Staff.

Applicable General Plan Policies:

- **Goal OSC-5:** Archaeological, historical, and cultural resources that are protected and integrated into the City's built environment.
- **Policy OSC-5.1:** Preserve and protect significant archaeological, historic, and cultural sites, places, districts, structures, landforms, objects and native burial sites, and other features, such as Ringing Rock and Grandmother Oak, consistent with state law.
- **Policy OSC-5.3:** Preserve sacred sites identified by the Pechanga Band of Luiseño Indians and Soboba Band of Luiseno Indians, such as tribal burial grounds, by avoiding activities that would negatively impact the sites.
- **Policy OSC-5.5:** Establish clear and responsible practices to identify, evaluate, and protect previously unknown archaeological, historic, and cultural sites, following CEQA and NEPA procedure.

Analysis of Project Effect and Determination of Significance:

Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a Cultural Native American tribe, and that is:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a.i) 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)			**X**	

The Menifee area has been inhabited by Native American tribes for almost 10,000 years. The Project area lies on the edge of the traditional cultural territory of the Cahuilla to the north and the Luiseño to the south. Both tribes are culturally related and belong to the Takic branch of the Shoshonean language family. Their lifestyles were based on hunting, collecting, and harvesting and they inhabited valleys, foothills, and mountain areas which provided them with a variety of food resources. These groups flourished throughout what is now known as western Riverside County up until first contact with the Spanish in the late 1760's. During the forced colonization period of the Spanish Missions, tribal members became increasingly sedentary, learned Spanish, were converted to Christianity, and provided the labor force for the missions and their ranchos. According to past reports from the Eastern Information Center, University of California, Riverside, the general Project area contains dozens of historical/archaeological sites, features, and isolates.

A previous cultural assessment for the adjacent Holland Road Overcrossing from 2015 found 22 surveys had previously been conducted within a one-mile radius of the overcrossing project area which includes the proposed Project site (*Historical Report*), A review of the overcrossing reports found no previously recorded sites within the overcrossing area or within the proposed Project site (*Holland Road Overpass MND*).

Assembly Bill (AB) 52 specifies that a project that may cause a substantial adverse change to a defined Tribal Cultural Resource (TCR) may result in a significant effect on the environment. AB 52 requires tribes interested in development projects within a traditionally and culturally affiliated geographic area to notify a lead agency of such interest and to request notification of future projects subject to CEQA prior to determining if a negative declaration (ND), mitigated negative declaration (MND), or environmental impact report (EIR) is required for a project. The lead agency is then required to notify the tribe within 14 days of deeming a development application subject to CEQA complete to notify the requesting tribe as an invitation to consult on the project. AB 52 identifies examples of mitigation measures that will avoid or minimize impacts to a TCR. The bill makes the above provisions applicable to projects that have a notice of preparation or a notice of intent to adopt a negative declaration/mitigated negative declaration circulated on or after July 1, 2015. AB 52 amends Sections 5097.94 and adds Sections 21073, 21074, 2108.3.1., 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to the California PRC, relating to Native Americans.

Based on the City's prior experience with and written request from potentially interested Tribes, AB 52 Notices were sent to the following four (4) Tribes on February 17, 2022:

- Agua Caliente Band of Cahuilla Indians;
- Pechanga Band of Luiseño Indians;
- Rincon Cultural Resources Department; and
- Soboba Band of Luiseño Indians.

A written response was received from Pechanga on March 18, 2022. The City conducted formal consultation with Pechanga on April 19, 2022 and discussed implementing the City's standard conditions of approval including tribal monitoring. They requested to see the Draft ND before release to the public per AB 52. The City then met with Pechanga representatives on January 25, 2023 as part of their ongoing AB 52 consultation. The Tribe expressed general concerns regarding impacts to the tribal cultural history in the area. The City sent them the ND, standard cultural Conditions of Approval (COAs) and site plan on January 25, 2023 and requested any additional comments by February 9, 2023. Per their request, the City also sent the Tribe the geotechnical report on January 26, 2023. To date, the City has not received any follow-up written comments from Pechanga. Follow-up emails were sent on February 13 and 14 again asking for written comments and to inform Pechanga the City intended to move forward with standard COAs if they received no additional response.

The City will continue to consult with Pechanga as necessary to formalize appropriate evaluation and protection measures for this Project (see Conditions of Approval outlined in Section 5, Cultural Resources. Per AB 52, the tribal consultation process will be completed prior to a decision on the Project regarding CEQA compliance.

Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a Cultural Native American tribe, and that is:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.ii) 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?			**X**	

Please reference the discussion in Threshold 18.a.i above relative to Native American history of the area and potential impacts to tribal cultural resources.

Section 5.b and 5.c outline the following seven (7) City Standard Conditions of Approval (COAs) that address potential impacts to cultural resources, including archaeological artifacts and human remains if found during grading (see Section 5, Cultural Resources of this Initial Study for full text of COAs).

- **COA – Inadvertent Archaeological Finds**
- **COA – Cultural Resource Deposition**
- **COA – Archaeologist Retained**
- **COA – Native American Monitoring (Pechanga)**
- **COA – Archaeological Report – Phases III and IV**
- **COA – Human Remains**
- **COA – Non-Disclosure of Reburials Location**

With implementation of these Standard COAs, 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 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. Impacts to tribal cultural resources will be less than significant.

Mitigation Measures

No mitigation measures are required.

19. UTILITIES AND SERVICE SYSTEMS.

Source(s): Project Plans (**Appendix G**); *Preliminary Hydrology and Hydraulics Report, Menifee StaxUp Storage Expansion*, prepared by SP2 & Co., 1-2023 (*Hydro Report*, **Appendix E1**); *Project-Specific Water Quality Management Plan, Menifee StaxUp Storage Expansion*, prepared by SP2 & Co., 1-2023 (*WQMP*, **Appendix E2**); *2020 Urban Water Management Plan* (*UWMP*), Eastern Municipal Water District; Metropolitan Water District *2020 Regional Urban Water Management Plan* (*RUWMP*); *2019 Sewer System Management Plan*, EMWD; *Water and Sewer Will Serve Letter*, prepared by Eastern Municipal Water District, 4-7-2022 (*Will Serve Letter*, **Appendix H**); Assembly Bill (AB) 939 Riverside County Department of Waste Resources (RCDWR), Planning Section and Countywide Integrated Waste Management Plan; CalRecycle; El Sobrante Landfill Fact Sheet, issued by Waste Management of California; and El Sobrante Landfill Annual Monitoring Report, January 1, 2019 through December 31, 2019, by USA Waste of CA, Inc., 9-2020.

Applicable General Plan Policies:

- **Goal LU-3:** A full range of public utilities and related services that provide for the immediate and long-term needs of the community.
- **Policy LU-3.1:** Work with utility providers in the planning, designing, and siting of distribution and support facilities to comply with the standards of the General Plan and Development Code.
- **Policy LU-3.2:** Work with utility provides to increase service capacity as demand increases.
- **Policy LU-3.4:** Require that approval of new development be contingent upon the project's ability to secure appropriate infrastructure services.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			**X**	

Less Than Significant Impact

The Project site is developed as the StaxUP self-storage facility, and its office currently utilizes the existing 12-inch water line in Holland Road maintained by the Eastern Municipal Water District (EMWD).

The site currently has a septic system with associated leach field which will be removed and replaced by a new connection to the existing EMWD sewer line in Holland Road to serve the new office (Building 1). Wastewater treatment will be also handled by EMWD which indicates in their "Will Serve" letter which states that "sewer system improvements would need to be constructed by

the property owner/developer in accordance with EMWD's standards, specifications and master plan".

The proposed Project will tie into existing storm drain facilities along the western and northern sides of the property. All site drainage is anticipated to run into two new infiltration basins in the northern and northeastern portions of the site. Local storm drainage is handled by the City of Menifee while major or regional facilities are managed by the Riverside County Flood Control and Water Conservation District (RCFCWCD).

As previously discussed in Section 10 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 San Jacinto Watershed – the Municipal Separate Sewer Permit (MS4) Permit as enforced by the Santa Ana Regional Water Quality Board (RWQCB). Additionally, there are no storm drains on the Project site or within the immediate vicinity. The *Hydro Study* concluded that development of the additional structures will require the development of two detention basins that will comply with NPDES, WDR, MS4, and RWQCB requirements, the construction of which will have a less than significant impact on storm water drainage systems.

Electricity and natural gas are supplied to the Project area by Southern California Edison (SCE) and Southern California Gas (SCG), respectively. SCE maintains electrical transmission and service lines along Holland Road, while SCG maintains a natural gas line in Holland Road.

Cable television is provided by Verizon/Spectrum and telecommunications services provide by Frontier – these companies maintain service lines in Holland Road adjacent to the Project site.

The proposed self-storage facility expansion is a relatively low intensity Project and local utility providers have adequate facilities in adjacent roadways to serve the proposed Project. For additional information, see Thresholds 19.b through 19.d. Therefore, the Project will not require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. Impacts will be less than significant, and no mitigation is required.

Would the Project?	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			**X**	

Less Than Significant Impact

The Project site's development plan proposes to connect to the EMWD water supply system. In conjunction with the Project site engineering effort to date, the Project proponent has obtained from EMWD a *Will Serve Letter* for the Project relative to water service.

EMWD is a public water agency formed in 1950 and annexed into the service area of the Metropolitan Water District of Southern California (MWD) in 1951. It is currently one of MWD's 26 member agencies. EMWD presently operates its water supply system under a system permit issued

by the California Department of Public Health. EMWD provides potable water, recycled water, and wastewater services to an area of approximately 555 square miles in western Riverside County. EMWD is both a retail and wholesale agency, serving a retail population of 546,146 people and a wholesale population of 215,075 people. As noted in the *2020 UWMP*, EMWD is located in one of the fastest growing regions in the nation, and with a growing population comes a growing demand for water.

EMWD has three sources of water supply: 1) imported water from the Metropolitan Water District of Southern California (MWD), 2) local groundwater, and 3) recycled water. Roughly 75% of EMWD's potable water demand is supplied by imported water from MWD through its Colorado River Aqueduct and connections to the State Water Project. EMWD forecasts that it would provide water for future growth in its service area through imported water from MWD.

EMWD procures water from MWD that has been treated at MWD's Skinner Filtration Plant in Winchester and the Mills Filtration Plant in Riverside. In 2010 EMWD obtained 75,000 acre-feet (af) of MWD water treated at MWD filtration plants before delivery, and 16,600 af of raw MWD water treated at EMWD water filtration plants. EMWD has two water filtration plants, one in Hemet and one in San Jacinto, with total existing capacity of 32 million gallons per day or about 35,840 af per year.

Adequate water service can be provided for the Project using existing and planned EMWD facilities. The Project will connect its new office building to the existing 12-inch water line in Holland Road. In order to provide a reliable source of water for firefighting purposes, potable water will also be delivered to all fire hydrants and fire sprinkler systems utilizing the potable water system. The piping has been designed to accommodate both the domestic demand and the fire-fighting demand.

Connections to local water mains will involve temporary and less than significant construction impacts that will occur in conjunction with other on-site improvements. In addition, the Project will be required to comply with standard conditions (Water Connection Fees and EMWD Water Efficient Guidelines).

It is estimated the self-storage expansion Project will have approximately 3 employees and the equivalent of 7 customers who may require water-related service during a typical operating day. According to the EMWD website[7], there is no consumption rate for self-storage commercial facilities although a single-family residential use consumes an average of approximately 55 gallons/person/day. As a worst-case estimate, it is assumed that up to 10 "people" (i.e., employees and customers) may be on the site and consume water during a typical day. An additional worst-case estimate is that landscaping on the site consumes the equivalent of an additional 10 persons. Therefore, it is estimated the Project could consume 1,100 gallons per day or 401,500 gallons (or about 1.23 acre-foot) of potable water each year. This additional amount of water represents less than 0.01 percent of the EMWDs existing treatment capacity (35,840 acre-feet)[8] and so the Project is well within the overall service capacity of the EMWD as documented in its current Urban Water Management Plan (UWMP)(EMWD 2021). As identified in the 2020 UWMP, EMWD has the ability to meet its current and project water demands through 2040 during normal, historic single-dry and historic multiple-dry year periods using imported water from MWD with existing supply resources.

It should be noted that EMWD's 2020 UWMP was based on land uses in the City of Menifee General Plan, and the proposed Project is consistent with the General Plan land use designation. The proposed self-storage facility expansion is consistent with the General Plan land use and zoning designations on the site. Therefore, the future water needs of the Project are accounted for in the

[7] Residential water consumption rate from EMWD website https://www.emwd.org/post/residential-water-budgets-and-rates
[8] One acre-foot of water equals approximately 126,000 gallons

2020 UWMP. The Project proponent has already obtained a *Will Serve Letter* from EMWD for the Project regarding water service.

The City has standard conditions of approval (COAs) for new commercial development that require compliance with the water conservation guidelines of the latest California Green Building Code (CalGreen) as well as implementing the "low impact development" (i.e., water conservation) requirements of EMWD the City. Implementation of these COAs is considered regulatory compliance and is not considered unique mitigation under CEQA.

Implementation of the proposed Project will not require, or result in, the construction of new water treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, occupancy of the Project will result in less than significant impacts regarding log-term water service and no mitigation is required.

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.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?			**X**	

Less Than Significant Impact

Refer also to Threshold 18.a., Wastewater services in the City of Menifee are provided by the Eastern Municipal Water District (EMWD). However, the Project site currently supports a self-storage facility which is a very low intensity use in terms of wastewater generation. The Project site is not currently connected to the EMWD wastewater/sewer system but instead utilizes a septic system with an associated leach field. The new self-storage expansion Project proposes to demolish the old existing septic system and construct a new connection to the existing EMWD sewer line in Holland Road to serve the new office (Building 1).

The EMWD provides wastewater treatment services to approximately 239,000 customers within its service area and currently treats approximately 43 million gallons per day of wastewater at its five active regional water reclamation facilities through 1,813 miles of sewer pipelines. These reclamation plants include San Jacinto Regional Water Reclamation Facility; Moreno Valley Regional Water Reclamation Facility; Perris Valley Regional Water Reclamation Facility; Sun City Regional Water Reclamation Facility; and Temecula Valley Regional Water Reclamation Facility.

Wastewater generated from the Project site would be treated at the Perris Valley Regional Water Reclamation Facility (PVRWRF)[4]. The typical daily flow at the PVRWRF is currently 15.5 million gallons per day (MGD) with a current capacity of 22 MGD and has a current excess capacity of approximately 6.5 MGD. The EMWD indicates the PVRWRF has an ultimate capacity[9] of 100 MGD.

[9] EMWD Regional Water Reclamation Facility Factsheet, January 2021
https://www.emwd.org/sites/main/files/file-attachments/sjvrwrffactsheet.pdf

As outlined in Threshold 18.a, it is estimated the Project could have the equivalent of 10 employees/customers each day who may require wastewater treatment from EMWD facilities. According to the EMWD website[10], individuals generate approximately 50 gallons of wastewater per person per day, therefore it is estimated the Project could generate a total of 500 gallons of wastewater per day into the EMWD sewer system. Wastewater generated from the Project site would be treated at the Perris Valley Regional Water Reclamation Facility (PVRWRF)[4]. The typical daily flow at the PVRWRF is currently 15.5 million gallons per day (MGD) with a current capacity of 22 MGD and has a current excess capacity of approximately 6.5 MGD. The EMWD indicates the PVRWRF has an ultimate capacity[11] of 100 MGD.

This additional amount of wastewater represents less than 0.01 percent of the EMWD's existing PVRWRF daily flow rate (15.5 MGD)[4] and less than 0.01 percent of its current maximum treatment capacity (22 MGD). Therefore, the Project is well within the overall sewer service and maintenance capacity of the EMWD as documented on the EMWD website[4] and in its current 2019 Sewer System Management Plan[12].

It should be noted that EMWD's *2020 UWMP* and 2019 Sewer System Management Plan were based on land uses in the Menifee General Plan, and the proposed Project is consistent with the General Plan land use designation. Therefore, the future wastewater needs of the Project are accounted for by the EMWD in planning for future wastewater treatment services.

The City has standard conditions of approval (COAs) for new commercial development that require compliance with the water conservation guidelines of the latest California Green Building Code (CalGreen) as well as implementing the "low impact development" (i.e., water conservation) requirements of EMWD the City. The use of water-reducing toilet fixtures will help reduce potential wastewater generation as well. The Project will also be required to satisfy City and EMWD requirements related to the payment of development impact fees and/or the provision of on- or offsite wastewater conveyance features. Measures that reduce water consumption can also help reduce wastewater generation (e.g., low flow toilets). Implementation of these COAs is considered regulatory compliance and is not considered unique mitigation under CEQA.

Demolition of the existing septic system and construction of a new sewer connection will involve temporary and less than significant construction impacts that will occur in conjunction with other on-site improvements. In addition, the Project will be required to comply with any standard conditions, if appropriate. Therefore, implementation 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. Any impacts will be less than significant, and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) 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?			**X**	

[10] wastewater generation rate from EMWD website
[11] EMWD Regional Water Reclamation Facility Factsheet, January 2021 https://www.emwd.org/sites/main/files/file-attachments/sjvrwrffactsheet.pdf
[12] EMWD 2019 Sewer System Management Plan, EMWD website https://www.emwd.org/sites/main/files/file-attachments/2019_full_report_ssmp.pdf?1576617293

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) which 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 City of Menifee, including the Project site, 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 18 southwest of the Lamb Canyon Landfill and 21 miles 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 maximum permitted capacity is 38,953,653 cubic yards and plans to continue operations through April 1, 2029 (estimated closure date).

El Sobrante Landfill

The Project site is also located within the service area of the El Sobrante Landfill, a service area that includes the cities/communities within southwestern Riverside County including the Project site and 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 percent of Riverside County's annual waste, according to Waste Management, Inc., the landfill's operator. The El Sobrante Landfill is located approximately 26 miles west 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 near Corona. 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.

Project Impacts

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 outlined in Threshold 18.a, the self-storage expansion Project may have the equivalent of 10 persons per day on the site who may generate solid waste similar to occupied residential structures each day. It is also reasonable to assume solid wastes will be generated by customers of the facility (i.e., disposing of materials that would otherwise require storage and associated costs). For the purposes of this analysis, it is assumed the Project will generate 100 pounds of waste per day, times the equivalent of 10 persons (employees/customers) per day. Therefore, it is estimated the Project will generate 1,000 pounds (0.5 ton) of waste per day or 365,000 pounds or 182.5 tons per year of waste that must be disposed of at County facilities. This represents 0.01 percent of the Lamb Canyon Landfill daily capacity (5,000 tons per day) or 0.003 percent of the El Sobrante Landfill daily capacity (16,054 tons per day). 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 (secondary) 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, and no mitigation is required.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			**X**	

Less Than Significant Impact

All land uses within Riverside County area, including those in the City of Menifee, that generate solid waste are required to coordinate with the County's contracted waste transfer hauler (Waste Management, Inc.) to collect solid waste on a common schedule as established in applicable local, regional, and State programs. Additionally, all development in the City 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), 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."

The Project would be required to comply with applicable aspects of AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991), AB 939, 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, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

20. WILDFIRE.

Source(s): Google Earth; *General Plan*; *GPEIR* (Chapter 5.8, *Hazards and Hazardous Materials)*; and Map My County (**Appendix A**).

Applicable General Plan Policies:

- **Goal S-4:** A community that has effective fire mitigation and response measures in place, and as a result is minimally impacted by wildland and structure fires.
- **Policy S-4.1:** Require fire-resistant building construction materials, the use of vegetation control methods, and other construction and fire prevention features to reduce the hazard of wildland fire.
- **Policy S-4.2:** Ensure, to the maximum extent possible, that fire services, such as firefighting equipment and personnel, infrastructure, and response times, are adequate for all sections of the City.
- **Policy S-4.3:** Encourage owners of nonsprinklered high-occupancy structures to retrofit their buildings to include internal sprinklers.
- **Policy S-4.4:** Review development proposals for impacts to fire facilities and compatibility with fire areas or mitigate
- **Goal S-6:** A City that responds and recovers in an effective and timely manner from natural disasters such as flooding, fire, and earthquakes, and as a result is not impacted by civil unrest that may occur following a natural disaster.
- **Policy S-6.1:** Continuously review, update, and implement emergency preparedness, response, and recovery plans that make the best use of the City- and county-specific emergency management resources available.
- **Goal S-5:** A community that has reduced the potential for hazardous materials contamination.
- **Policy S-5.1:** Locate facilities involved in the production, use, storage, transport, or disposal of hazardous materials away from land uses that may be adversely impacted by such activities and areas susceptible to impacts or damage from a natural disaster.
- **Policy S-5.2:** Ensure that the fire department can continue to respond safely and effectively to a hazardous materials incident in the City, whether it is a spill at a permitted facility, or the result of an accident along a section of the freeway or railroads that extend across the City.

Analysis of Project Effect and Determination of Significance:

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			**X**	

Less Than Significant Impact

According to the *GPEIR*, the proposed Project site is not located within a fire hazard severity zone and is not located in or near a state responsibility area. There are no wildland conditions in the immediate area where the Project site is located, and it is not located in or near a Historical Wildland Fire area.

A limited potential exists to interfere with an emergency response or evacuation plan during construction. Construction work in the street associated with the Project will be limited to lateral utility connections (i.e., water or sewer) that will be limited to nominal potential traffic diversion.

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 alleviate any construction circulation impacts. The TCP is a standard condition and is not considered unique mitigation under CEQA. Following construction, emergency access to the Project site and area will remain as was prior to the proposed Project.

All Project elements, including landscaping, will be sited with sufficient clearance from the proposed buildings so as not to interfere with emergency access to and evacuation from the site. The proposed Project is required to comply with the California Fire Code as adopted by the Menifee Municipal Code.

The Project will not impair an adopted emergency response plan or emergency evacuation plan. Impacts will be less than significant.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				**X**

No Impact

The proposed Project site is not located within a fire hazard severity zone and is not located in or near a state responsibility area. There are no wildland conditions in the immediate area where the Project site is located, and it is not located in or near a Historical Wildland Fire area.

The Project site is generally flat. Elevations within the Project range between approximately 1,440 to 1,452 feet AMSL.

The Project will provide physical improvements which will be developed to the most recent fire codes. These codes are designed to suppress any fire risks (including wildfire risks). 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.

Based on the above, the Project would not, 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. Any impacts will be less than significant.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			**X**	

Less Than Significant Impact

The proposed Project site is not located within a fire hazard severity zone and is not located in or near a state responsibility area. There are no wildland conditions in the immediate area where the Project site is located, and it is not located in or near a Historical Wildland Fire area.

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 Project site is currently developed, and any roads and utilities will be installed in accordance with the respective jurisdiction requirements. Impacts will be less than significant.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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?				**X**

No Impact

The proposed Project site is not located within a fire hazard severity zone and is not located in or near a state responsibility area. There are no wildland conditions in the immediate area where the Project site is located, and it is not located in or near a Historical Wildland Fire area.

Topographic relief at the subject property is relatively low with the terrain being generally flat. Elevations at the site range from approximately 1,440 to 1,452 feet AMSL. According to *Map My County*, there are no steep slopes or water sources within a one-quarter mile radius of the Project site.

The Project will include hardscape and landscape improvements that would serve to stabilize the 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.

Mitigation Measures

No mitigation measures are required.

21. MANDATORY FINDINGS OF SIGNIFICANCE.

Source(s): Staff review and Project Plans (**Appendix G**).

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the Project 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?			**X**	

Less Than Significant Impact

Implementation of the proposed Project does not 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, 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 4 (Biological Resources) and Section 5 (Cultural Resources) for recommended standard Conditions of Approval that will apply to the proposed Project to protect biological and cultural resources. Any impacts are considered less than significant with standard conditions incorporated.

The City hereby finds that impacts will be less than significant with the standard conditions incorporated.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the Project have impacts that 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, the effects of other current projects, and the effects of probable future projects)?			**X**	

Less Than Significant Impact

Cumulative impacts can result from the interactions of environmental changes resulting from one proposed project with changes resulting from other past, present, and future

projects that affect the same resources, utilities and infrastructure systems, public services, transportation network elements, air basin, watershed, or other physical conditions. Such impacts could be short-term and temporary, usually consisting of overlapping construction impacts, as well as long term, due to the permanent land use changes and operational characteristics involved with the Project.

Section 15130(b)(1) of the CEQA Guidelines identifies two methods to determine the scope of related projects for cumulative impact analysis:

- *List-of-Projects Method:* a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency.
- *Summary-of-Projections Method:* a summary of projections contained in an adopted general plan or related planning document or in a prior environmental document that has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency. The proposed Project is consistent with the City of San Jacinto General Plan, AQMP, and the CMP. Therefore, cumulative impacts will be less than significant.

Based on the analysis of the Project's impacts in the responses to items 1 through 20 of this Environmental Assessment, the proposed Project does not have impacts which are individually limited, but cumulatively considerable. Standard conditions will apply to the proposed Project. Any 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) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

Less Than Significant Impact

Based on the analysis of the Project's impacts in the responses to items 1 through 20, there is no indication that this Project will result in substantial adverse effects on human beings. Long-term effects include incremental increases in vehicular traffic, traffic-related noise, temporary use of hazardous materials, and emissions of criteria pollutants and greenhouse gas emissions. The analysis herein concludes that direct and indirect environmental effects in these other topics will remain at less than significant levels. Based on the analysis in this Initial Study, the City finds that direct and indirect impacts to human beings will be less than significant with standard regulatory compliance.

V. 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:

VI. SOURCES/REFERENCES

Appendices A through I, as listed in the Table of Contents.

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 (CBC)
http://www.bsc.ca.gov/Home/Current2013Codes.aspx

CalRecycle
https://www2.calrecycle.ca.gov/swfacilities/Directory/36-AA-0055/
https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates#Commercial
https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2256?siteID=2402

City of Menifee Traffic Impact Analysis Guidelines for Vehicle Miles Traveled, prepared by Fehr & Peers, 6-3-2020
https://www.cityofmenifee.us/DocumentCenter/View/10699/Final-Adopted-TIA-Guidelines-for-VMT_6-3-20

Department of Finance
https://dof.ca.gov/

Eastern Municipal Water District 2020 Urban Water Management Plan
https://www.emwd.org/post/urban-water-management-plan

El Sobrante Landfill Annual Monitoring Report
http://www.rcwaste.org/Portals/0/Files/ElSobrante/2020/FINAL%20-2019_El_Sobrante_Landfill_Annual_Status_Report.pdf

El Sobrante Landfill Fact Sheet
https://www.wmsolutions.com/locations/details/id/180

EMWD Regional Water Reclamation Facility Factsheet, January 2021
https://www.emwd.org/sites/main/files/file-attachments/sjvrwrffactsheet.pdf

EMWD 2019 Sewer System Management Plan, EMWD website
https://www.emwd.org/sites/main/files/file-attachments/2019_full_report_ssmp.pdf?1576617293

EnviroStor website
http://www.envirostor.dtsc.ca.gov

Federal Emergency Management Agency (FEMA) National Flood Hazard Viewer
https://fema.maps.arcgis.com/apps/webappviewer/index.html

GEOTRACKER website
http://geotracker.waterboards.ca.gov

Google Maps
https://maps.google.com

Menifee General Plan
https://www.cityofmenifee.us/221/General-Plan

Menifee General Plan Environmental Impact Report
https://www.cityofmenifee.us/262/Environmental-Impact-Report

Menifee Municipal Code
https://codelibrary.amlegal.com/codes/menifee/latest/overview

Menifee Citywide Trails Map
https://www.cityofmenifee.us/295/Park-Trails-Open-Space-Recreation-Master

Menifee Union School District
https://www.menifeeusd.org/

Menifee Zoning Map
https://www.cityofmenifee.us/DocumentCenter/View/10804/Current-Zoning-Map-041520?bidId=

Metropolitan Water District 2020 Regional Urban Water Management Plan
https://www.mwdh2o.com/media/21641/2020-urban-water-management-plan-june-2021.pdf

Perris Union High School District
https://www.puhsd.org/

Public Resources Code (PRC)
http://www.search-california-law.com/research/titletoc/ca/PRC/index.html

Riverside Transit Agency
https://www.riversidetransit.com/

Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy
https://scag.ca.gov/connect-socal

U.S. Census Bureau
https://www.census.gov/quickfacts/fact/table/menifeecitycalifornia/

USGS Website, topographic maps
https://apps.nationalmap.gov/downloader/#/

Wastewater generation rate from EMWD website EMWD Regional Water Reclamation Facility

Factsheet, January 2021
https://www.emwd.org/sites/main/files/file-attachments/sjvrwrffactsheet.pdf

Western Riverside County Multiple Species Habitat Conservation Plan Interactive Maps
https://www.wrc-rca.org/rcamaps/

Wetlands Mapper of the National Wetlands Inventory maintained by the USGS
https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/